

# Public Document Pack



<b>COMMITTEE:</b>	<b>DEVELOPMENT CONTROL COMMITTEE B</b>
<b>DATE:</b>	<b>WEDNESDAY, 26 OCTOBER 2022 9.30 AM</b>
<b>VENUE:</b>	<b>KING EDMUND CHAMBER, ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH</b>

<b>Councillors</b>	
<u>Conservative and Independent Group</u> James Caston Peter Gould Kathie Guthrie (Chair) Dave Muller (Vice-Chair)	<u>Green and Liberal Democrat Group</u> Andrew Mellen Mike Norris Andrew Stringer Rowland Warboys

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## **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 DISCLOSABLE PECUNIARY INTERESTS AND OTHER REGISTRABLE OR NON REGISTRABLE INTERESTS BY MEMBERS**
- 3 **DECLARATIONS OF LOBBYING**
- 4 **DECLARATIONS OF PERSONAL SITE VISITS**
- 5 **SA/22/9 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 28 SEPTEMBER 2022** 5 - 18
- 6 **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

7	<b>SA/22/10 SCHEDULE OF PLANNING APPLICATIONS</b>	19 - 20
	<i>Note: The Chairman may change the listed order of items to accommodate visiting Ward Members and members of the public.</i>	
a	<b>DC/22/04313 UNIT 1, GIPPING WAY, STOWMARKET, IP14 1RA</b>	21 - 56
b	<b>DC/21/05596 LAND AT PIPPS FORD, A14 SLIP OFF TO A140, CODDENHAM, SUFFOLK, IP6 8LJ</b>	57 - 200
c	<b>DC/21/06824 LAND AT FENNINGS FARM, PIXEY GREEN, STRADBROKE, SUFFOLK</b>	201 - 300
d	<b>DC/22/01535 LAND AT, BLACKSMITH ROAD, COTTON, IP14 4QN</b>	301 - 328
8	<b>SITE INSPECTION</b>	

#### **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 should arrive in the Council Chamber early and make themselves known to the Officers. They will then be invited by the Chairman to speak when the relevant item is under consideration. This will be done in the following order:

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

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

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

#### **Date and Time of next meeting**

Please note that the next meeting is scheduled for Wednesday, 23 November 2022 at 9.30 am.

## **Webcasting/ Live Streaming**

The Webcast of the meeting will be available to view on the Councils Youtube page:  
[https://www.youtube.com/channel/UCSWf\\_0D13zmegAf5Qv\\_aZSg](https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg)

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### **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.



# Agenda Item 5

## MID SUFFOLK DISTRICT COUNCIL

Minutes of the meeting of the **DEVELOPMENT CONTROL COMMITTEE B** held in the Frink Room (Elisabeth) - Endeavour House on Wednesday, 28 September 2022

### PRESENT:

Councillor: Kathie Guthrie (Chair)

Councillors: James Caston Lavinia Hadingham  
Sarah Mansel Mike Norris  
Andrew Stringer Rowland Warboys

### Ward Member(s):

Councillors: Keith Welham  
Rachel Eburne

### In attendance:

Officers: Chief Planning Officer (PI)  
Area Planning Manager (GW)  
Planning Lawyer (IDP)  
Planning Officers (AS / VP)  
Governance Support Officer (AN)

### Apologies:

Councillors: Peter Gould  
Andrew Mellen  
David Muller BA (Open) MCMI RAFA (Councillor) (Vice-Chair)

## 32 APOLOGIES / SUBSTITUTIONS

32.1 Apologies were received from Councillors Muller, Mellen and Gould.

32.2 Councillor Hadingham substituted for Councillor Gould.

32.3 Councillor Mansel substituted for Councillor Mellen.

## 33 TO RECEIVE ANY DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER REGISTRABLE OR NON REGISTRABLE INTERESTS BY MEMBERS

33.1 None declared.

## **34 DECLARATIONS OF LOBBYING**

34.1 Councillor Mansel and Councillor Warboys declared that they had been lobbied on application DC/21/06333.

## **35 DECLARATIONS OF PERSONAL SITE VISITS**

35.1 None declared.

## **36 SA/22/7 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 3 AUGUST 2022**

36.1 It was resolved that the minutes of the meeting held on the 3<sup>rd</sup> August 2022 were confirmed and signed as a true record.

## **37 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

37.1 The Governance Officer reported that one petition had been received regarding application number DC/21/06333 (Item 7A) with 132 valid signatures supporting the following statement:

### **We OBJECT to this application for the following reasons:**

1. A1088 between the roundabout and the heath road don't have any pavement or cycle route to accommodate with increased uncontrolled traffic level from both side of A14 to proposed service. Specially pedestrians and cyclists from Elmswell and Norton to Woolpit Heath Centre and pedestrians and cyclists from Woolpit and surrounding villages to Elmswell railway station are at risk.

2. Increased uncontrolled traffic exiting the site will be on the left-hand lane and the traffic from A14 east slip road are on the right-hand lane just before the roundabout. Both lane users must position their vehicle according to their following journey but there is very short distance to change their lane.

3. Drive thru food facilities motivate the customers eat and drink on the wheel in the very confused merging traffic just before the roundabout.

4. There is petrol station and the essential facilities in A14 junction 42 - Asda, J43 -Tesco, J44-BP & Sainsbury, J49-BP, J50- Tesco and McDonalds and J51-Shell with properly planned and developed roads and roundabouts to facilitate A14 traffic. Fossil fuel and obesity are the big concern about governments.

5. The job creation are only the expenses of existing Coffee shops, Pubs, Takeaways, Bakeries, Convenience stores and Petrol stations in Elmswell,

Woolpit, Norton and surrounding villages.

6. Clearly there is no need for such big development without any essential infrastructure development such as new road, roundabouts, etc to accommodate the increased uncontrolled traffic level. The increased traffic noise and disruption to the Villages to perform their day today life and the public safety is in question.

Therefore, we strongly object this planning application.

### 38 SA/22/8 SCHEDULE OF PLANNING APPLICATIONS

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

<b>Application Number</b>	<b>Representations From</b>
DC/21/06333	David Brown (Elmswell Parish Council) Julia Ewans (Objector) James Bailey (Agent) Councillor Sarah Mansel (Ward Member) Councillor Helen Geake (Ward Member)
DC/21/06605	Andy Wells (Agent) Councillor Andrew Stringer (Ward Member)
DC/22/01159	Jonathan Miller (Old Newton Parish Council) Mark Clements (Objector) Dale Radford (Agent) Councillor Keith Welham (Ward Member) Councillor Rachel Eburne (Ward Member)
DC/20/01249	Vicky Waples (Thurston Parish Council) Hannah Short (Agent)

### 39 DC/21/06333 LAND OFF A14, ELMSWELL, SUFFOLK

39.1 Item 7A

Application Proposal	DC/21/06333 Full Planning Application - Development of a petrol filling station, a drive-thru restaurant and coffee shop, together with various infrastructure and landscaping works
Site Location Applicant	Land Off A14, Elmswell, Suffolk Euro Garages Ltd.

39.2 Councillor Mansel declared herself as the Ward Member for this item and confirmed that she would not debate or vote on the application.

39.3 The Case Officer presented the application to the Committee outlining the proposal before Members including: the location of the site, the constraints of the site, the site location plan, the existing and proposed site layout, proposed

highway and pedestrian access, the elevations, floor, and roof plans for the proposed units, proposed electric vehicle charging points, the landscaping strategy, the proximity of the site to nearby churches, and the Officer recommendation for approval.

- 39.4 The Case Officer responded to questions from Members on issues including: whether heavy goods vehicles (HGVs) will have access to the site, previous application refusals on the site, pedestrian access to the site, the proximity of the site to the A14, the proximity of the site to listed buildings, whether the canopy will be lit, vehicular access to the site from both directions along the A14, the dimensions of the proposed units, the recommendation of the installation of a fire hydrant from Suffolk Fire and Rescue, the proposed construction hours, and whether the proposed facilities will have their own designated parking spaces.
- 39.5 The Case Officer responded to questions from the Ward Members on issues including: whether the application will provide a financial contribution towards the development of a cycle route between Elmswell and Woolpit.
- 39.6 The Highways Officer, Ben Chester, responded to questions from Members on issues including: who pays for the Stage 1 audit, the location of the pedestrian crossing, the location of the pedestrian refuge, the application's proposed financial contributions towards pedestrian access developments, the impact of increased traffic on the current road networks, and the safety concerns of HGVs accessing and using the site.
- 39.7 Members considered the representation from Councillor David Brown who spoke on behalf of Elmswell Parish Council.
- 39.8 The Parish Council representative responded to questions from Members on issues including: the traffic capacity limits for the existing roads coming into Elmswell.
- 39.9 Members considered the representation from Julia Ewans who spoke as an Objector.
- 39.10 Members considered the representation from James Bailey who spoke as the Agent.
- 39.11 The Agent responded to questions from Members on issues including: whether the site will be leased or sold after construction, the maintenance of the site, the direction of vehicles through the site, and the amount of proposed parking spaces.
- 39.12 Members considered the representation from Councillor Helen Geake who spoke as a Ward Member.
- 39.13 Members considered the representation from Councillor Sarah Mansel who spoke as a Ward Member.

39.14 A short break was taken between 11:04am and 11:14am.

39.15 Members debated the application on issues including: the location of the site, the potential heritage impact of the site, the consultation response from Suffolk Police and the potential for an increase of crime in the area, the pre-existing traffic issues near the site, the demand for the proposed services.

39.16 Councillor Stringer proposed that the application be refused for the following reasons:

- The development would be contrary to the provisions of saved Policy T6, T10 of the Development Plan and paragraphs 110, 111 and 130(f) of the National Planning Policy Framework
- That the less than substantial harm caused to the significance of heritage assets is not outweighed by the limited public benefit of the proposal and therefore does not comply with paragraphs 199 and 202 of the NPPF

Subject to further highways and heritage advice and a risk assessment on the above reasons for refusal

39.17 Councillor Warboys seconded the proposal.

By a unanimous vote

**It was RESOLVED:**

**That the Committee is minded to refuse for the following reasons, subject to further highways and heritage advice and a risk assessment on the below reasons for refusal:**

**The proposed development, by reason of the design and layout of the proposed vehicle egress onto the A1088 and resulting increase in uncontrolled traffic levels, and the resultant conflicts between vehicles exiting the site and those using the existing A14 egress slip road, would result in severe detrimental impact on existing highway safety. On this basis the development would be contrary to the provisions of saved Policy T6, T10 of the Development Plan and paragraphs 110, 111 and 130(f) of the National Planning Policy Framework.**

**The proposal results in a level of less than substantial harm to the significance of heritage assets, due to the increased prominence of modern development within the setting of the historic parish churches at Woolpit and Elmswell. This is not outweighed by the limited public benefit of the provision of an additional petrol filling station in an area with sufficient provision, such that the proposal does not comply with paragraphs 199 and 202 of the NPPF.**

**Also delegate to officers to review whether the proposed development would fail to safeguard against crime and disorder.**

**40 DC/21/06605 LAND TO THE REAR OF CEVA LOGISTICS, NORWICH ROAD, MENDLESHAM (IN THE PARISH OF, WETHERINGSETT-CUM-BROCKFORD) IP14 5NA**

40.1 Item 7A

Application Proposal	DC/21/06605 Planning Application - Erection of three warehouse units and external storage area (use class B8), new access from Norwich Road, parking, associated drainage and landscaping
Site Location	Land To The Rear Of Ceva Logistics, Norwich Road, Mendlesham (In The Parish Of, Wetheringsett Cum Brockford) IP14 5NA
Applicant	Henley Associates (London) Ltd

40.2 Councillor Stringer declared himself as the Ward Member for this item and confirmed that he would not debate or vote on the application.

40.3 Councillor Mansel resumed her place on the Committee.

40.4 The Case Officer presented the application to the Committee outlining the proposal before Members including: the location of the site, the constraints of the site, the flood zones in proximity to the site, the proposed block plan, the proposed landscaping, the location of proposed cycle parking, the proposed elevations, the proposed floor and roof plans, the proposed access plan, the additional information in the tabled papers, and the Officer's recommendation for approval.

40.5 The Case Officer responded to questions from Members on issues including: vehicular access to the site, whether there is pedestrian access to and from the neighbouring development, electric vehicle charging points, the inclusion of PV solar panels, height limits on the stacking of containers on the site, what materials will be used in construction, and the permeability of the proposed materials for surface construction.

40.6 Members considered the representation of Andy Wells who spoke as the Agent.

40.5 The Agent responded to questions from Members on issues including: proposed access to the site, the inclusion of PV solar cells, a height limit restricting the stacking of containers on the site, the permeability of the proposed surface materials, the landscape strategy, and the amount of acres of roof space on the development.

40.6 Members considered the representation from Councillor Stringer who spoke as the Ward Member.

40.7 Members debated the application on issues including: job creations, the location of the application, the potential loss of category 3A land, a potential

height restriction on stacked containers, sustainability energy provisions, and pedestrian permeability between the site and neighbouring developments.

40.8 Councillor Caston proposed that the application be approved as detailed in the Officer recommendation with the following conditions:

- No stacking prior to first occupation, to limit level of stacking of containers and open storage, to limit to no further than the roof height of the permitted buildings
- Sustainability – scheme for water, energy, and resource efficiency measures; including provision of renewable energy measures and solar panels

40.9 Councillor Hadingham seconded the proposal.

By a unanimous vote

**It was RESOLVED:**

**That the application is GRANTED planning permission subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:**

- **Standard time limit (3yrs for commencement of scheme);**
- **Approved Plans (Plans submitted that form this application);**
- **Landscaping scheme (including proposed changes in ground levels);**
- **Landscaping time of commencement and aftercare;**
- **Materials, colours, and finishes;**
- **Highways - Completion of access junction prior to first use/occupation;**
- **Highways - Access visibility splays prior to first use;**
- **Highways - Estate Roads and Footpath details prior to commencement;**
- **Highways - Turning and parking prior to first use;**
- **Highways - Refuse and recycle bins storage and presentation areas prior to first use;**
- **Highways - EV charging details prior to commencement above slab level;**
- **Highways - Employees Shuttle Bus details prior to first use;**
- **Proposed footpath diversion route to be approved by SCC PROW prior to existing route being diverted or obstructed in any way by the approved development;**
- **Surface water disposal strategy to be implemented as approved;**
- **Surface water verification report following practical completion of last unit;**
- **Construction Surface Water Management Plan (CSWMP) prior to commencement;**
- **Biodiversity Method Statement and Enhancement Strategy;**
- **Wildlife lighting design scheme;**
- **Sustainability – water, energy, and resource efficiency measures;**
- **Fire Hydrants;**
- **Construction Management Plan;**
- **Construction Hours;**

- **External Lighting Details**
- **Remove PD rights Class P (B8 - Storage and Distribution to C3 - Dwellinghouses)**

**With the following conditions:**

- **No stacking prior to first occupation, to limit level of stacking of containers and open storage, to limit to no further than the roof height of the permitted buildings**
- **Sustainability – scheme for water, energy, and resource efficiency measures; including provision of renewable energy measures and solar panels**

#### **41 DC/22/01159 LAND EAST OF, GREENACRES, OLD NEWTON, SUFFOLK**

##### 41.1 Item 7C

Application Proposal	DC/22/01159 Reserved Matters submission following Outline Planning Permission DC/19/02878 dated 12/02/2021. Submission of details for Appearance, Layout and Scale for the Erection of 64 no dwellings (including 22 affordable)
Site Location Applicant	Land East of, Greenacres, Old Newton, Suffolk Keepmoat Homes

41.2 Councillor Stringer resumed his place on the Committee.

41.3 Councillor Stringer declared himself as the Suffolk County Councillor for Old Newton.

41.4 The Case Officer presented the application to the Committee outlining the proposal before Members including: the location of the site, the constraints of the site, the access to the site, the proposed layout, the proposed property-type distribution across the site, the site boundaries, the proposed elevations, the materials to be used, the potential heritage impact, the proposed locations of the surface water basins and the connected pumping station, parking provisions, the landscaping strategy, footpath and vehicular connectivity across the site, the additional conditions as proposed by the Case Officer, and the Officer recommendation for approval.

41.5 The Case Officer responded to questions from Members on issues including: safety provisions surrounding the main drainage basin, the smaller overflow drainage basins, electric vehicle charging points, whether the tree located at the main entrance to the site has a Tree Protection Order (TPO), restrictions to parking on green verges, the connectivity of the site to nearby schools, and the lack of healthcare provision to support residents of this development.

41.6 The Case Officer responded to questions from Ward Members on issues



including: the vehicular connectivity through the site, the increased dimensions of the proposed footpaths, and the impact of increasing the footpath dimensions on the green spaces at the front of properties.

- 41.7 Members considered the representation from Councillor Jonathan Miller who spoke on behalf of Old Newton Parish Council.
- 41.8 Members considered the representation from Mark Clements who spoke as an Objector.
- 41.9 Members considered the representation from Dale Radford who spoke as the Agent.
- 41.10 The Agent responded to questions from Members on issues including: the consultation response from Anglia Water, and the capacity limits of the pre-existing drainage system throughout Old Newton.
- 41.11 Members considered the representation from Councillor Keith Welham who spoke as a Ward Member.
- 41.12 Members considered the representation from Councillor Rachel Eburne who spoke as a Ward Member.
- 41.13 Members debated the application on issues including: communication between the developers and Old Newton Parish Council, the number of houses proposed for the development, a no-dig zone, the proposed parking arrangements, and concerns about the drainage system.
- 41.14 Councillor Caston proposed that the application be approved as detailed in the Officer recommendation with the following conditions:
- Parking to plot 040 shall be 'no-dig' construction
  - New footpath from Greenacres southwards to be 2m wide
  - No commencement to development of any plot on the line of FP47 until such time as a temporary diversion order has been agreed by SCC and no occupation until permanent diversion
  - Further elevational details on specific corner turning plots
  - Additional traditional vernacular roof materials on specific plots
  - Detail of wall construction to be agreed
  - Notwithstanding detention basin construction detail no fencing or railing shall be installed
  - Scheme for fence to open areas to prevent parking on amenity areas
  - No dig for hard surfacing adjacent to Greenacres
- 41.15 Councillor Hadingham seconded the proposal.

By a unanimous vote

**It was RESOLVED:**

**That subject to the receipt of requested amended drawing prior to the meeting and those amendments being satisfactory to the Chief Planning Officer and the Committee, then the amended Reserved Matters details be APPROVED subject to conditions that shall include:**

- **Link to the outline planning permission**
- **Approved drawings**
- **Updating of the previously approved structural landscaping details**
- **Submission of a Liaison Commitment Statement**
- **Full landscaping details**
- **Foraging trail delivery**
- **Site gate/s detail/s to be further agreed prior to commencement and such detail as approved to be installed. Such gates shall be capable of secure locking**
- **Notwithstanding any approved drawings, full and exact details of all external materials to be further submitted and specific plots to include Marley Eternit style artificial slates**
- **Footway replacement for FP47 to be 2m wide**
- **Changes to boundary detail as specified in the report**
- **Construction Method Statement**
- **Amendment to parking for plot 040 to avoid intrusion into root protection area**
- **Introduction of 'natural play' to play area**
- **Remove PD rights on all bungalows due to their deployment to reduce risk of overlooking of adjoining properties (A detail that was not known at outline stage)**
- **Wildlife sensitive lighting details**
- **Inclusion of foraging trail**
- **100% EV charging (plots with garages and on plot parking delivery of electricity supply and apparatus) (units with communal parking or layby parking) (electricity supply and connection point)**
- **Innovative landscaping around drainage basins**
- **Such conditions as may be considered reasonable by the Chief Planning Officer**

**INFORMATIVE**

1. **Drawing the attention of the developer to the fact that the RM approval**

is without prejudice to the requirement for the developer to secure the necessary Diversion Order from SCC PRow Team prior to obstructing (temporarily or permanently) any part of Public Footpath 47 that runs through the site.

2. The development the details of which are hereby approved within this Reserved Matters application make provision for the 22 affordable homes and 42 open market homes secured with the associated S106 Agreement. That accompanies the outline planning permission to which this Reserved Matters approval relates.

And the following additional conditions:

- Parking to plot 040 shall be 'no-dig' construction
- New footpath from Greenacres southwards to be 2m wide
- No commencement to development of any plot on the line of FP47 until such time as a temporary diversion order has been agreed by SCC and no occupation until permanent diversion
- Further elevational details on specific corner turning plots
- Additional traditional vernacular roof materials on specific plots
- Detail of wall construction to be agreed
- Notwithstanding detention basin construction detail no fencing or railing shall be installed
- Scheme for fence to open areas to prevent parking on amenity areas
- No dig for hard surfacing adjacent to Greenacres

**42 DC/20/01249 LAND ON THE NORTH SIDE OF, NORTON ROAD, THURSTON, SUFFOLK**

42.1 Item 7D

Application Proposal	DC/20/01249 Submission of details under Outline Planning Permission 5070/16 - Appearance, Landscaping, Layout and Scale in respect of Phase 2 - Erection of 104 no. dwellings. (Reserved Matters [RM])
Site Location	Land on The North Side of, Norton Road, Thurston, Suffolk
Applicant	Linden (Thurston) LLP [part of Vistry Group]

42.2 A short break was taken between 13:56pm and 14:28pm before the commencement of application number DC/20/01249.

42.3 Councillor Hadingham left the Committee.

- 42.4 The Case Officer presented the application to the Committee outlining the proposal before Members including: the location of the site, the constraints of the site, the proposed layout of the development, access to the site, the mix of affordable housing, the proposed elevations and floor plans for the different house types, the proposed boundary enclosure detail, parking, the landscaping strategy, the proximity of the site to an existing school, the S106 that was agreed at outline, the addition conditions as proposed by the Case Officer, and the Officer recommendation for approval.
- 42.5 The Case Officer responded to questions from Members on issues including: the self-build plots, the type of fencing along the boundary of the site, noise mitigation between floors in the flat units, efforts to ensure there is not a parking overspill on the site, the choice of trees within the landscaping strategy, electric vehicle charging points, the conditions approved at outline, the consultation response from Place Services, and the woodland management strategy.
- 42.6 Members considered the representation from Vicky Waples who spoke on behalf of Thurston Parish Council.
- 42.7 Members considered the representation from Hannah Short who spoke as the Agent.
- 42.8 The Agent responded to questions from Members on issues including: the inclusion of PV solar cells, how the homes will be heated, and further consultation with Thurston Parish Council.
- 42.9 Members debated the application on issues including: the decision to use brick walls on the development, the landscaping strategy, the proposed inclusion of gas boilers, restrictions to parking on green verges, further consultation between the developer and the parish council, the previous S106 agreement, the environmental sustainability of the development, the lack of PV solar provisions, and the proposed layout.
- 42.10 Councillor Warboys proposed that the application be approved as detailed in the Officer recommendation with the following conditions:
- Landscaping details required inside the drainage basin
  - Parking adjustment where extra spaces overhang the plot boundary
  - Further elevational details on specific corner turning plots
  - Walling must replace proposed fencing on defined plots
  - Additional traditional vernacular roof materials on specific plots
  - Private alleys to be gated and lockable
  - Scheme for fences to open areas to prevent parking on amenity areas
  - PV panels installation for purchasers

- Construction management hours of operation to avoid peak school hours
- And an Informative to set out involvement of Parish Council including future planning of play areas and woodland management

42.11 Councillor Norris seconded the proposal.

By a vote of 4 For and 2 Against

**It was RESOLVED:**

**APPROVE THE RESERVED MATTERS DETAILS with appropriate conditions that include**

- **Linking reference to outline planning permission and timescales therein**
- **Submission of further details of precise external materials to be used [manufacturer name, colour composition texture etc]**
- **Notwithstanding submitted detail further landscaping detail to also include play area locations and equipment detail along with reinforced planting to eastern edge of site**
- **Submission of Woodland Management Scheme**
- **Submission of Parish Council liaison Scheme**
- **Notwithstanding... Further details of specific corner-turning plots**
- **Notwithstanding... Altered boundary treatment details to specific plots**
- **Notwithstanding... Further ecological information as required by Place Services Ecology**
- **100% EV Provision within Phase 2**

**With the additional conditions:**

- **Landscaping details required inside the drainage basin**
- **Parking adjustment where extra spaces overhang the plot boundary**
- **Further elevational details on specific corner turning plots**
- **Walling must replace proposed fencing on defined plots**
- **Additional traditional vernacular roof materials on specific plots**
- **Private alleys to be gated and lockable**
- **Scheme for fences to open areas to prevent parking on amenity areas**
- **PV panels installation for purchasers**
- **Construction management hours of operation to avoid peak school hours**

**And an Informative to set out involvement of Parish Council including future planning of play areas and woodland management**

**43 SITE INSPECTION**

43.1 None received.

The business of the meeting was concluded at 15:21pm.

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Chair

# Agenda Item 7

## MID SUFFOLK DISTRICT COUNCIL

### DEVELOPMENT CONTROL B COMMITTEE

26 October 2022 - 09:30

#### 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/22/04313	Unit 1, Gipping Way, Stowmarket, Suffolk, IP14 1RA	Cllr Paul Ekpenyong / St Peter's	Amelia Powell	21 – 56
7B	DC/21/05596	Land at Pipp's Ford, A14 Slip off to A140, Coddanham, Suffolk, IP6 8LJ	Cllr Timothy Passmore and Cllr John Whitehead / Claydon & Barham	Jasmine Whyard	57 – 200
7C	DC/21/06824	Land at Fennings Farm, Pixey Green, Stradbroke, Suffolk	Cllr Julie Flatman / Stradbroke & Laxfield	Mahsa Kavyani	201 – 300
7D	DC/22/01535	Land at, Blacksmith Road, Cotton, IP14 4QN	Cllr Andrew Mellen / Bacton	Mahsa Kavyani	301 - 328

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# Agenda Item 7a

## Committee Report

**Item No: 7A**

**Reference: DC/22/04313**

**Case Officer: Amelia Powell**

**Ward: St Peter's.**

**Ward Member/s: Cllr Paul Ekpenyong.**

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## **RECOMMENDATION – GRANT PLANNING PERMISSION WITH CONDITIONS**

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### **Description of Development**

Full Planning Application - Subdivision and part change of use of unit (former vacant Poundland Class E(a) retail unit) to a hot food takeaway (Sui Generis<sup>1</sup>) including new glazed frontage, creation of side access, extraction flue system and 3No Condenser Units.

### **Location**

Unit 1, Gipping Way, Stowmarket, Suffolk IP14 1RA

**Expiry Date: 25/10/2022**

**Application Type: FUL - Full Planning Application**

**Development Type: Change of Use**

**Applicant: Smith Jenkins Ltd**

**Agent: Baldip Basi**

**Parish: Stowmarket**

**Density of Development:**

Gross Density (Total Site): 93sq.m

**Details of Previous Committee / Resolutions and any member site visit: None**

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

**Has the application been subject to Pre-Application Advice: No**

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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

The premises/site is owned by Mid Suffolk District Council, although the application is itself submitted by a takeaway operator- Papa John's. This part of the building is currently vacant.

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<sup>1</sup> In a class by itself

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## PART TWO – POLICIES AND CONSULTATION SUMMARY

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### Summary of Policies

#### **Stowmarket Action Area Plan [21 February 2013]**

First, we need to consider the detail within Policy 5.2 [10] because it contains a caveat that is central to the consideration of the application to hand.

Policy 5.2 [10]

*“For the purposes of development, within the defined town centre any retail frontage (A1-A5) that is not within the Primary Shopping Frontage will be considered as being within a Secondary Shopping Frontage.”*

Officer comment:

1. The application site is within the Defined Town Centre.
2. It is not within the Defined Primary Retail Frontage.
3. Whilst it is not within the Defined Secondary Retail frontage the fact that it is a lawful retail use that fronts customers using the entrance, the effect of Policy 5.2 [10] is to put it in a Secondary Retail Frontage.

Having established that the premises can be defined as Secondary Retail Frontage we need to move onto Policy 5.4 [4 &5].

5.4 [4] states that to protect Primary Retail Frontage takeaways will only be permitted in Secondary Retail frontages. This application site is in a Secondary Retail frontage by virtue of the definition provided by Policy 5.2 [10].

5.4 [5] which does not permit takeaways outside the town centre is not engaged as the application site is within the Town Centre.

This takes us to the most important policy for the determination of the change of use application. Policy 5.4 [4]. It states

Policy 5.4 [4] Hot food takeaways

*“In order to protect the sensitive areas of the town centre, the Council will only permit proposals for new A5 uses (hot food takeaways) within the town centre in Secondary Shopping Frontages.”*

**Officer comment:**

The proposed change of use is acceptable in principle as it complies with Stowmarket Action Area Plan Policy 5.4 [4] which specifically addresses takeaway uses in the Town Centre as the application site is within a Secondary Retail frontage within the Town Centre where takeaway uses are permitted.

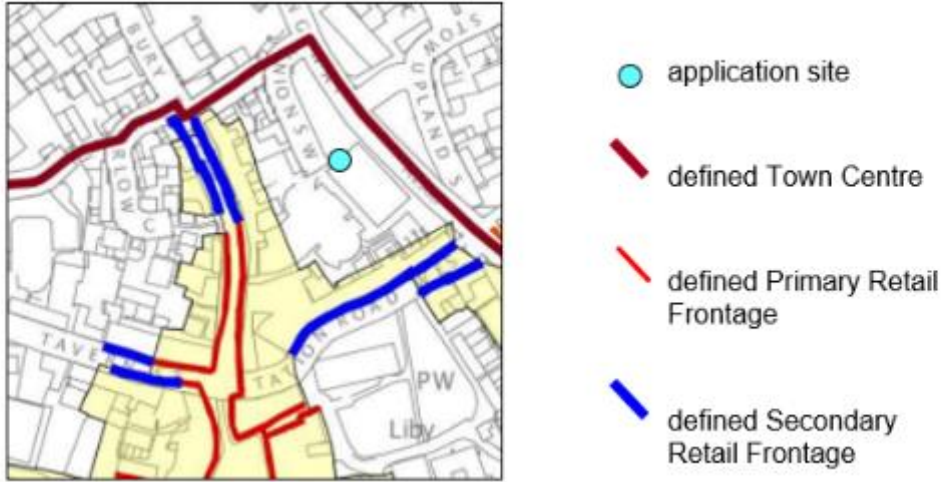


Figure 2 Extract from Stowmarket Action Area Plan - Map 5.1 Town Centre

**Mid Suffolk Core Strategy Focused Review [2012]**

- FC1 - Presumption in favour of sustainable development
- FC1.1 - Mid Suffolk approach to delivering Sustainable Development
- FC3 - Employment

**Mid Suffolk Core Strategy [2008]**

- CS1 - Settlement hierarchy

**Mid Suffolk Local Plan [2008]**

- H16 - Protecting existing residential amenity
- GP01 - Design and layout of development
- SB02 - Development appropriate to its setting
- HB01 - Protection of historic buildings
- HB08 - Protecting the character of conservation areas

**NPPF 2021 [including]**

- Section 7: Ensuring the vitality of town centres
- Section 16: Conserving and enhancing the historic environment

**Adopted Parking Standards 2019**

**Neighbourhood Plan Status**

None

**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 Council (Appendix 3)**

**Stowmarket Town Council states:** [response recorded by DM service 9 September 2022]

“There is no objection to the proposed application”

### **National Consultee (Appendix 4)**

It has not been necessary to contact any national consultees on this application.

### **County Council Responses (Appendix 5)**

#### **SCC - Fire & Rescue Comments Received - 15/09/2022**

##### Access and Fire

Fighting Facilities Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

##### Water Supplies

No additional water supply for fire fighting purposes is required in respect of this planning application.

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).

### **Internal Consultee Responses (Appendix 6)**

#### **Environmental Health: [Noise, Odour, Light, Smoke] [dated 31 Aug 2022]**

No objection is raised but the following is recommended:

##### Ongoing requirement – BS4142 limit on external noise levels

The rating level of sound emitted from any fixed plant and/or machinery associated with the use hereby approved shall not exceed the background sound level during operating at any time.(taken as a 15 minute LA90 at the nearest/any sound sensitive premises). All measurements shall be made in accordance with the methodology of BS4142 (2014) (Methods for rating and assessing industrial and commercial sound) and/or its subsequent amendments. Where access to the nearest sound sensitive property is not possible, measurements shall be undertaken at an appropriate location and corrected to establish the noise levels at the nearest sound sensitive property.

Reason: to minimise detriment to nearby residential amenity

### Equipment

Prior to the development coming into beneficial use, the scheme of arrangements for internal air extraction, odour control, and discharge to atmosphere from cooking operations, as submitted to and approved in writing by the local planning authority shall be installed. Such a system should be suitably attenuated and isolated to prevent noise nuisance. The equipment shall be effectively operated and maintained in accordance with manufactures instructions for as long as the proposed use continues.

### Kitchen Informative Note

The premises will require registration under Regulation (EC) No. 852/2004 on the Hygiene of Foodstuffs, Article 6(2) and will need to comply with the design and structural standards contained in the relevant Food Hygiene Regulations prior to becoming operational. The applicant is advised to contact the Food and Safety team on 0300 1234000 (option 6) for further information.

### **B: Representations**

At the time of writing this report at least 6 letters/emails/online comments have been received. It is the officer opinion that this represents 6 objections, 0 support and 0 general comments. A verbal update shall be provided as necessary.

Views are summarised below:-

- Increase in anti-social behaviour (3)
- Noise (3)
- Fear of crime
- Inappropriate in a Conservation Area
- Increase in pollution
- Increased traffic and highways issues
- Loss of privacy
- Smells (odour)
- Sustainability
- Opening times
- Litter

*Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation. All correspondence is visible online*

### **RELEVANT RECENT PLANNING HISTORY**

<b>REF:</b> DC/19/04869	Full Planning Application - Part change of use of A1 unit to Gym (D2) including alterations to entrance door	<b>DECISION:</b> 12.12.2019	<b>GRANTED</b>
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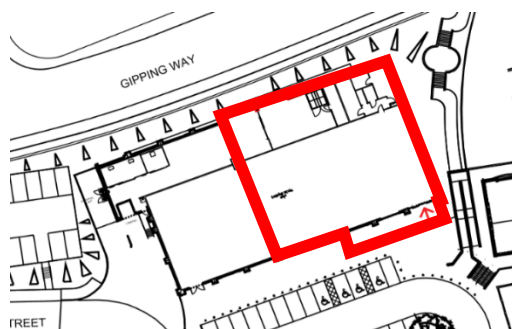


Figure 3 Site Location Plan for DC/19/04869

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## PART THREE – ASSESSMENT OF APPLICATION

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### 1.0 The Site and Surroundings

- 1.1 The application site is located within the northern part of Stowmarket Town Centre and is accessed via Union Street West. The site is occupied by a large detached former retail unit with a 76-space public car park located on the southern side of the site. Gipping Way bounds the site to its east: Union Street Long Stay Car Park to the north, and commercial uses are located to the south and west of the site, beyond the car park.
- 1.2 The unit was originally occupied by Aldi and more recently Poundland. Following a sustained period of vacancy, the unit was subdivided in 2020 and approximately half was converted to a Pure Gym.
- 1.3 The site is located in the Stowmarket Town Centre Conservation Area. The building is not Listed. The site is located within Flood Zone 1 and is not vulnerable to pluvial or fluvial flooding.
- 1.4 There are many public transport links within close proximity to the site with the Stowmarket Railway Station a relatively short distance away.

### 2.0 The Proposal

- 2.1 The application comprises the sub-division of the ground floor of the former 'Poundland Store' [now vacant retail] [now Class E] to create a takeaway unit with a floor area of 93sq.m. [1011sq.ft.] with the remainder of the ground floor [presently vacant] continuing to enjoy lawful retail use except where the building is now occupied by 'Pure Gym' under a planning permission from 2019.

*Note: Retail use and the indoor gym use both now fall into Class E of Schedule 2, Part A 'Commercial, Business and Service' of the Town and Country Planning [Use Classes] [Amendment] England] Regulations 2020. [relating to the Town and Country Planning [Use Classes] Order 1987, as amended]*

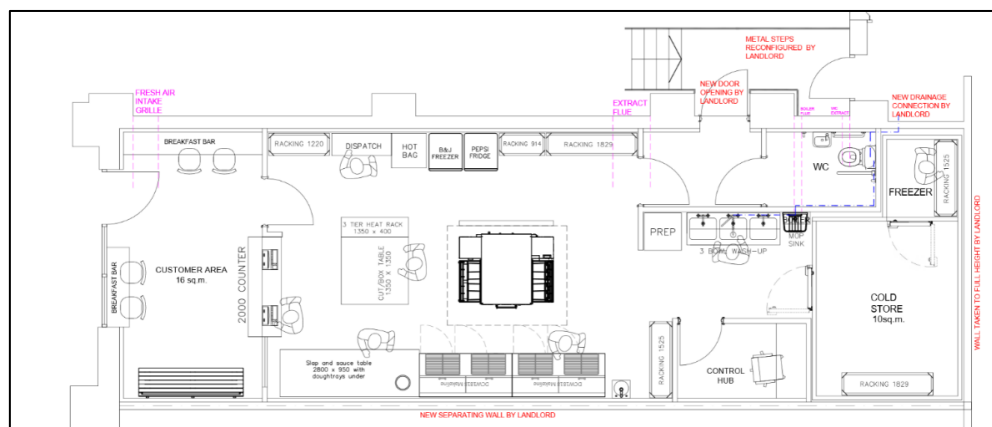


Figure 4 Proposed Ground Floor Plan

- 2.2 Also Included in the proposal is:

- The installation of a new shopfront.
- Installation of external plant [condensers and /intake extract flues]

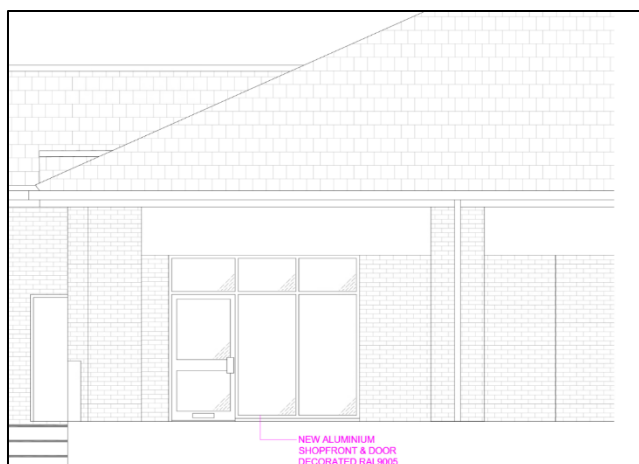


Figure 5 Proposed Shopfront

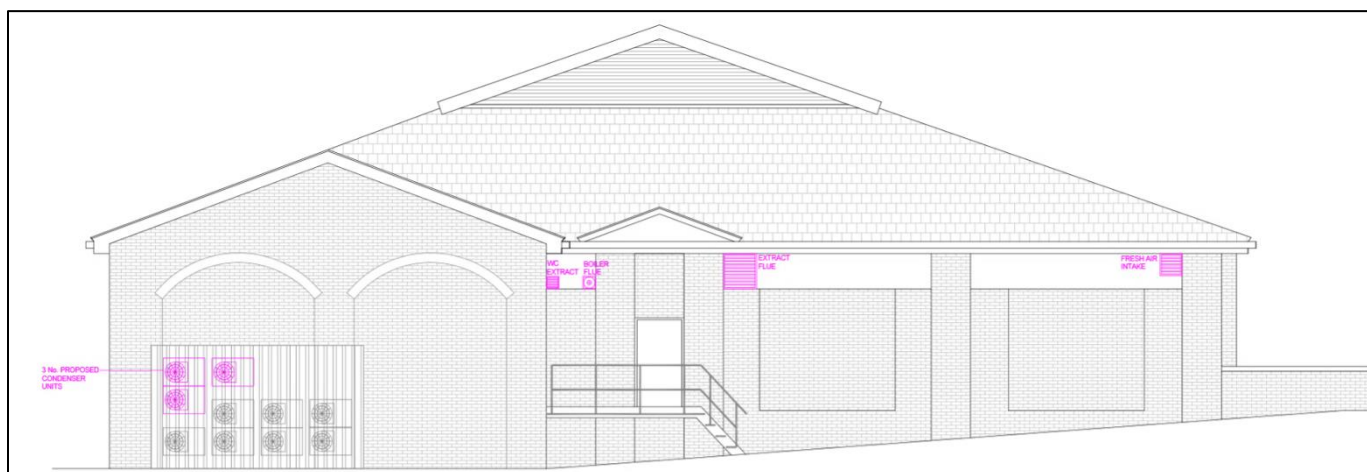


Figure 6 Proposed External Plant

2.3 'Papa John's' [the proposed operator] specialises in takeaway pizza.

2.4 The agent describes<sup>2</sup> proposed hours of business as follows:

Sunday – Wednesday [inclusive] 11.00 hours - 00.00 hours  
 Thursday – Saturday [inclusive] 11.00 hours - 02.00 hours

**Officer comment:**

*Members will have noted that the Council's Environmental Health Team does not object to the proposed hours. Whilst for three days nights of the week the business plans to be open until 2am this does mean it*

<sup>2</sup> Page 5 of supporting planning statement

*can support the night-time economy in the Town Centre. Clearly it is important to consider the impact that a late-night operation might have on residential amenity but the site sits behind Bury Street and beside a car park. Undoubtedly this part of the Town Centre experiences some disturbance from pubs, clubs and eateries during the busiest nights of the week. This to be expected in a Town Centre location.*

*It is expected that like other pizza takeaway operators Papa John's will have a significant proportion of its business within the 'delivered to your door' market, which suggests that customer visits to the premises will be tempered by the changes that have occurred to customer behaviour since the outbreak of covid and with the development of convenient delivery apps.*

2.5 The applicant's agent has confirmed [email 12.10.22] that the business will employ between 15-20 staff and that at peak times [weekend] there will be between 6 to 7 members of staff present at any one time.

2.6 Deliveries are likely to necessitate approximately 4 drivers. The agent has indicated that Papa John's obtain 2-4 parking permits for delivery drivers to utilise.

### **3.0 The Principle of Development**

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

#### **3.2 Change of Use (including heritage considerations)**

3.3 The proposed change of use is policy compliant in that it is consistent with Policy 5.2[10] and 5.4[4] of the Adopted Stowmarket Action Area Plan which supports takeaway uses within Secondary Retail Frontages [as here] within Stowmarket Town Centre.

3.4 Retail policies for Stowmarket Town Centre are designed to protect the vitality and viability of the Town Centre and objective that is entirely consistent with the NPPF 2021 and the Government's Town Centre First philosophy.

3.5 In the Defined Town Centre, the Stowmarket Action Area Plan views takeaway use as complementing the range of retail experience available within a Secondary Retail Frontage without prejudicing conventional retail activity within the Primary Retail Frontages

3.6 The proposed change of use is therefore acceptable in principle

3.7 Setting aside the external alterations for a moment, the use of this unit for takeaway purposes will introduce a new level of activity into the conservation area in terms of customer activity as the premises have been vacant. However, if one reflects on the previous Poundland and Aldi uses, it is clear that they would themselves have created significant levels of activity in the vicinity. The activity generated by the proposed use will not impact the character of the conservation area to any greater extent than the previous lawful uses. The question of the impact of the shopfront on the character of the conservation area is dealt with in the section below.

### **4.0 The shopfront (including Heritage considerations)**

4.1 The proposed shopfront is to be formed within what is presently a wall and access door to



the wider building.

- 4.2 It is of a simple design consisting of an aluminium frame and glazed door [all coloured Jet Black - RAL 9005].
- 4.3 The proposed shopfront is modern in character, lacking many of the traditional components found in traditional shopfronts. [eg: It does not have a stall-riser or pilasters] That said it is composed to present three equal panels to the frontage with a transom rail dividing the top quarter of the shopfront from the remaining three quarters. Mullions separate the three panels. The door to the unit occupies the land hand third. This reflects a traditional composition.

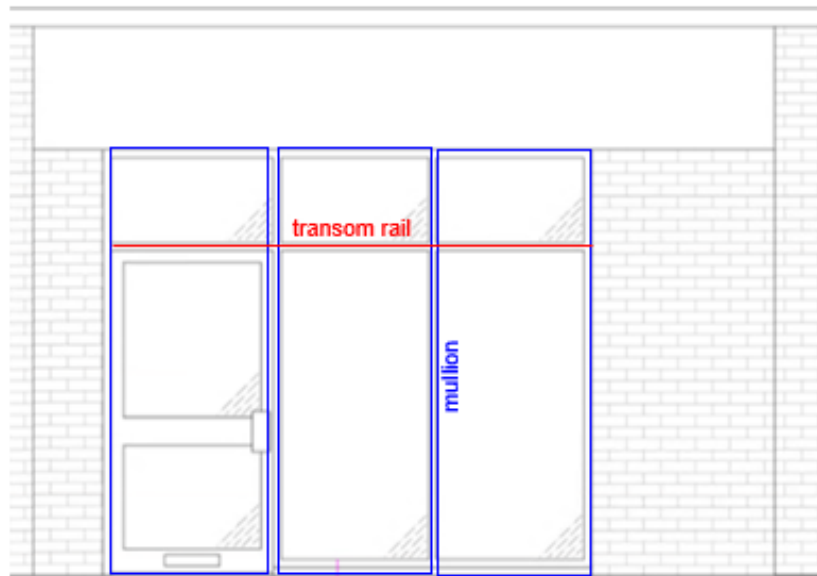


Figure 7 Proposed Shopfront Composition

- 4.4 The site sits within the Stowmarket Conservation Area and therefore the Council has a duty under Policy HB08 to consider the impact of the proposal on the character of the conservation area. Will it preserve and enhance that character?
- 4.5 The wider building is a modern intervention into the conservation area and is not without interest. [contrasting brick decoration, colonnaded entrance, brick piers, shallow pitched roof with Suffolk hips]
- 4.6 The proposed modern shopfront with the elements earlier is appropriate for this building and a traditional timber shopfront would appear incongruous and therefore would detract from the character of the wider conservation area.



Figure 8 Existing Building [former Aldi prior to former Poundland] application unit shown in red square



*Figure 9 Rear of existing buildings in Bury Street*

- 4.7 The building the subject of this application sits beyond a surface car park that sits behind historic frontages to Bury Street and as such is visually distinct from the historic core of Stowmarket Town Centre.



*Figure 10 Aerial view*

- 4.8 The site is considered to be sufficiently distant from listed buildings within the vicinity and the proposed shopfront so in keeping with the current appearance of the building within which it will sit that there will be no harm to the setting of any of these listed buildings

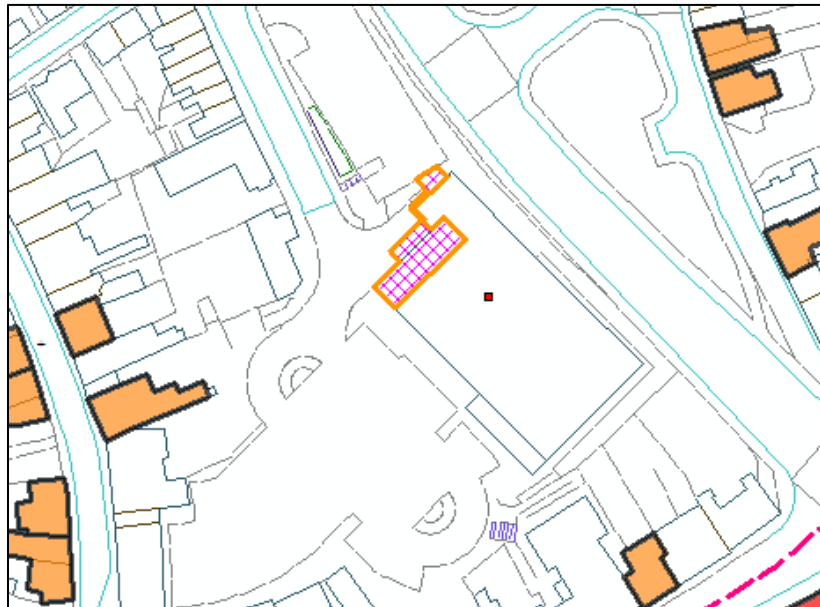


Figure 11 Listed buildings and their relationship with the application site

## **5.0 External plant**

- 5.1 Other external alterations, including the installation of plant and ventilation equipment, including a flue are modest in scale and consistent with the use of the property and the town centre location. On the basis that this new external equipment will be small scale and not be visible from any key views within the Conservation Area, there will be no adverse impact on its character or appearance.
- 5.2 The fans specified for use in the extraction installations are Woods Powerbox (see Appendix C below) together with a 500JM woods axial fan for the supply Air. However, the contractor is permitted to install equal approved units from alternative manufacturers and, as the contractor is responsible for the design of the installation, they are required to meet noise criteria as part of that approval. When installed, all plant is mounted on anti-vibration mountings in order to isolate them from the structure and double flange flexible connectors between the flue and fan equipment to minimise vibration.
- 5.3 Environmental Health (noise, odour, light and smoke) raised no objection to the proposal but recommended conditions relating to the following:
- Limit on external noise levels: the rating level of sound emitted from any fixed plant and/ or machinery associated with the use hereby approved shall not exceed the background sound level during operating at any time
  - Arrangements for internal air extraction, odour control and discharge into the atmosphere from cooking operations should be submitted prior to the development coming into use



## 6.0 Amenity

- 6.1 Environmental Health as previously indicated has raised no objection regarding some amenity issues. However, it is clear from some of the responses from local people that there are concerns regarding anti-social behaviour, noise and increase traffic/ highways issues, smells (odour) and a loss of privacy.
- 6.2 The nearest wholly residential buildings appear to be those to the north of the application site in Union Street West
- 6.3 Diagonally opposite the site is an existing restaurant

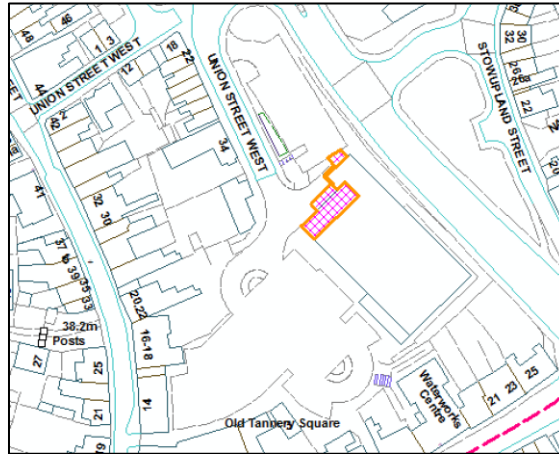


Figure 12 Map of immediate vicinity



Figure 13 Adjacent restaurant and residential properties in Union Street West



- 6.4 With a use such as this being located adjacent to a public car park there will be a likelihood of some customers choosing to eat their pizzas in their car [perhaps more so at night when friends are on a night out]. This in and of itself is not an issue if consideration is shown.
- 6.5 There is however a risk that unless bins are provided [or despite bins being provided] some may choose to throw packaging out of the car window once the pizza has been eaten. Clearly that is undesirable on a number of levels.
- 6.6 To combat this it is suggested that if Members are minded to agree the recommendation [approve] then conditions be added to require the operator [Papa John's] not only to provide a bin outside their premises and empty it before it overflows but also to agree a litter collection strategy with the local planning authority that requires them every morning to collect, bag and appropriately dispose of any Papa John's related litter within the car park.
- 6.7 Furthermore it is also recommended that Papa John's be required to display a sign on the carpark facing wall of their premises [details to be agreed] asking customers to show respect for people living near to the premises
- 6.8 There is a 24 hour gym, south of site, directly neighbouring the proposed Papa Johns establishment therefore, the area can already be noisy with users of the gym using the public car park to arrive and leave the premises.
- 6.9 The hours of business should also be restricted to those indicated by the agent in order to provide local assurance that hours cannot be extended without further approval.
- 6.10 Neighbour objection comments also raised concerns that there are too many fast-food establishments within close proximity to the proposed site. The establishment diagonally opposite the site is a restaurant, rather than a hot food takeaway.
- 6.11 Whilst some residents may be of the view above Members will have noted that Policy 5.4[4] of the Stowmarket Action Area Plan 2013 permits takeaways in Secondary Retail Frontages in order to protect sensitive areas of the town centre. This proposal is not considered to affect sensitive areas of the town centre, by affecting the primary retail frontages.
- 6.12 Furthermore, with the site being in Stowmarket Town Centre, having a variety of options is expected.

## **7.0 Highway matters and Parking**

- 7.1 The relevant vehicle parking standard is 1 space per 3 sqm. of public area, plus 1 space per 4 employees normally present. *[Suffolk County Council 'Adopted Guidance for Parking' document, third edition, May 2019]*
- 7.2 The public area within the proposed takeaway floorspace measures 16sq.m which equates to 5 parking spaces. [rounded down from 5.33]
- 7.3 It is expected that the use will require 4-6 employees to be present at the busiest times. Papa John's will obtain 2-4 parking permits for delivery drivers to utilise the adjacent public car park, as indicated in the planning statement submitted with this application.
- 7.4 The total parking space requirement is therefore 1-1.5

7.5 Whilst the proposal does not include any on-plot parking space it fronts a public car park. This is considered an appropriate solution to customer and staff parking particularly as the wider building was once in full retail use with all that implies in terms of parking demand.

7.6 The relevant cycle parking standard requires the proposed use to provide 2 cycle parking spaces [2 spaces per 50sq.m]. At 93sq.m the use generates a requirement for 4 cycle spaces. This can [if members are minded to approve the application] be conditioned as appropriate racks or other cycle parking equipment.

## **8.0 Waste and good deliveries**

8.1 The proposal will utilise the existing area adjacent to the building / loading bay to accommodate 2no. 1100 litre bins. It is anticipated that there will be one refuse bin for general waste and one for cardboard recycling. All bins would be emptied on a weekly basis. To prevent pests, refuse bins will be BIFFA lockable wheelie bins. The Applicant has a standard contract with a pest control agency to control and manage the presence of vermin around the premises. The premises would also be sealed to prevent pests gaining access via the windows or under the doors.

## **9.0 Conditions**

9.1 It is suggested that as well as the condition recommended by Environmental Health the following controls also be added

1. A litter collection protocol to be submitted by the applicant and approved by the lpa prior to the business commencing to ensure that the use adjacent to the car park does not result in litter from Papa John's products being strewn across the adjacent car park and left there. Papa John's will need to provide a commitment to daily early morning collection of any Papa John's related material in the car park.
2. Litter bin provision immediately outside the premises with commitment for emptying by Papa John's
3. Cycle parking spaces for 4 cycles to be provide prior to business opening
4. Hours of business restricted to hours indicated in the material submitted
5. Waste storage arrangements
6. Details of delivery driver permits (as indicated in the Planning Statement) to be submitted and agreed in writing

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## **PART FOUR – CONCLUSION**

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### **13.0 Planning Balance and Conclusion**

13.1 The site has been vacant since being formally used as Aldi and Poundland. The proposal will bring back the use of a vacant floorspace into a productive economic use.

13.2 This will help to support the vitality of the town centre.

13.3 The take-away establishment will provide jobs for 15-20 employees - with there being 6/7 members of staff in the store at any given point as well as approximately 4 delivery drivers.

- 13.34 The take-away will be beneficial to Stowmarket's night-time economy. The proposal lies in the town centre and is easily accessible from night life in the area such as local pubs, the nightclub Carbon and other recreational facilities in the centre such as the Regal cinema. Although there are other fast food establishments in Stowmarket Town Centre, none are in direct proximity to Papa Johns. The proposed establishment will add to consumer choice and with it being a centre, it is important for there to be variety and options.
- 13.5 Furthermore, the take-away will introduce further supervision of the car park at night. With there being a 24-hour gym, the proposal will provide natural surveillance, providing a sense of security and safety and therefore, enhancing inclusivity.
- 13.6 Although there is likely to be additional activity in the area that may or may not generate anti-social behaviour, conditions have been suggested to minimise the risk and, in any event, it must be recognised that this is a town centre location where late-night activity, particularly at weekends, is typical.
- 13.7 The proposed development is not considered to result in any significant adverse impact on highways safety, residential amenity, heritage assets, the environment or biodiversity interests to warrant refusal.
- 13.9 Therefore, in conclusion, proposal is acceptable with the added safeguards provided by the recommended conditions. Recommendation is to grant permission.

## **RECOMMENDATION**

That planning permission for change of use to takeaway and for the installation of a shopfront and external plant be **GRANTED** subject to conditions

**(1) That the Chief Planning Officer be authorised to GRANT Planning Permission subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:**

1. Standard time limit
2. Approved plans
3. Litter Collection Protocol
4. Litter bin provision immediately outside the premises
5. Cycle parking spaces for 4 cycles to be provide prior to business opening
6. Hours of business restricted to hours indicated in the material submitted
7. Waste storage arrangements
8. Details of delivery driver permits
9. Limit on external noise levels
10. Equipment arrangements

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Application No: DC/22/04313

Location: Unit 1, Gipping Way, Stowmarket IP14 1RA

Page No.

<b>Appendix 1: Call In Request</b>	<i>N/A</i>	
<b>Appendix 2: Details of Previous Decision</b>	<i>none</i>	
<b>Appendix 3: Town/Parish Council/s</b>	<i>Stowmarket Town Council - NO objection 09.09.22</i>	
<b>Appendix 4: National Consultee Responses</b>	<i>None</i>	
<b>Appendix 5: County Council Responses</b>	<i>SCC – Fire &amp; Rescue 15.09.22</i>	
<b>Appendix 6: Internal Consultee Responses</b>	<i>Environmental Health – Noise/Odour/Light/Smoke 31.08.22</i>	
<b>Appendix 7: Any other consultee responses</b>	<i>none</i>	
<b>Appendix 8: Application Site Location Plan</b>	<i>Yes</i>	
<b>Appendix 9: Application Plans and Docs</b>	<i>Yes</i>	
<b>Appendix 10: Further information</b>	<i>N/A</i>	

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



Babergh and Mid Suffolk District Councils

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Ref. No.	Details	Site and Applicant
DC/22/04313	Subdivision and part change of use of unit (former vacant Poundland Class E(a) retail unit) to a hot food takeaway (Sui Generis) including new glazed frontage, creation of side access, extraction flue system and 3No Condenser Units.	Unit 1, Gipping Way for Papa John's (GB) Ltd, Smith Jenkins Ltd
<b>Representation to Planning Authority:</b>		
There is no objection to the proposed application from the Town Council.		

Babergh 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/F221026B  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 15/09/2022

Dear Sirs

**Unit 1, Gipping Way, Stowmarket IP14 1RA**  
**Planning Application No: DC/22/04313/FUL**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

**Water Supplies**

No additional water supply for fire fighting purposes is required in respect of this planning application.

/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 or appoint Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Copy: [baldip@smithjenkins.co.uk](mailto:baldip@smithjenkins.co.uk)

Enc: Sprinkler information

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 31 Aug 2022 04:05:59

**To:**

**Cc:**

**Subject:** FW: WK312124 DC2204313

**Attachments:**

---

**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>

**Sent:** 31 August 2022 15:25

**To:** Amelia Powell <Amelia.Powell@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** WK312124 DC2204313

Environmental Health -  
Noise/Odour/Light/Smoke

**APPLICATION FOR PLANNING PERMISSION - DC/22/04313**

**Proposal:** Full Planning Application - Subdivision and part change of use of unit (former vacant Poundland Class E(a) retail unit) to a hot food takeaway (Sui Generis) including new glazed frontage, creation of side access, extraction flue system and 3No Condenser Units.

**Location:** Unit 1, Gipping Way, Stowmarket, Suffolk IP14 1RA

Thank you for consulting me on this application.

Having reviewed the supporting documentation I ask that the following are added as conditions to any permission granted.

Ongoing requirement – BS4142 limit on external noise levels

The rating level of sound emitted from any fixed plant and/or machinery associated with the use hereby approved shall not exceed the background sound level during operating at any time.(taken as a 15 minute LA90 at the nearest/any sound sensitive premises). All measurements shall be made in accordance with the methodology of BS4142 (2014) (Methods for rating and assessing industrial and commercial sound) and/or its subsequent amendments.

Where access to the nearest sound sensitive property is not possible, measurements shall be undertaken at an appropriate location and corrected to establish the noise levels at the nearest sound sensitive property.

*Reason: to minimise detriment to nearby residential amenity*

Prior to the development coming into beneficial use, the scheme of arrangements for internal air extraction, odour control, and discharge to atmosphere from cooking operations, as submitted to and approved in writing by the local planning authority shall be installed. Such a system should be suitably attenuated and isolated to prevent noise nuisance. The equipment shall be effectively operated and maintained in accordance with manufactures instructions for as long as the proposed use continues.

Kitchen informative: The premises will require registration under Regulation (EC) No. 852/2004 on the Hygiene of Foodstuffs, Article 6(2) and will need to comply with the design and structural standards contained in the relevant Food Hygiene Regulations prior to becoming operational. The applicant is advised to contact the Food and Safety team on 0300 1234000 (option 6) for further information.

**Andy Rutson-Edwards**, MCIEH AMIOA  
Senior Environmental Protection Officer  
**Babergh and Mid Suffolk District Council - Working Together**  
Tel: 01449 724727  
Email [andy.rutson-edwards@babberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@babberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

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# Development Control Committee B

26 October 2022



Page 45



**Application No:  
DC/22/04313**

Address:

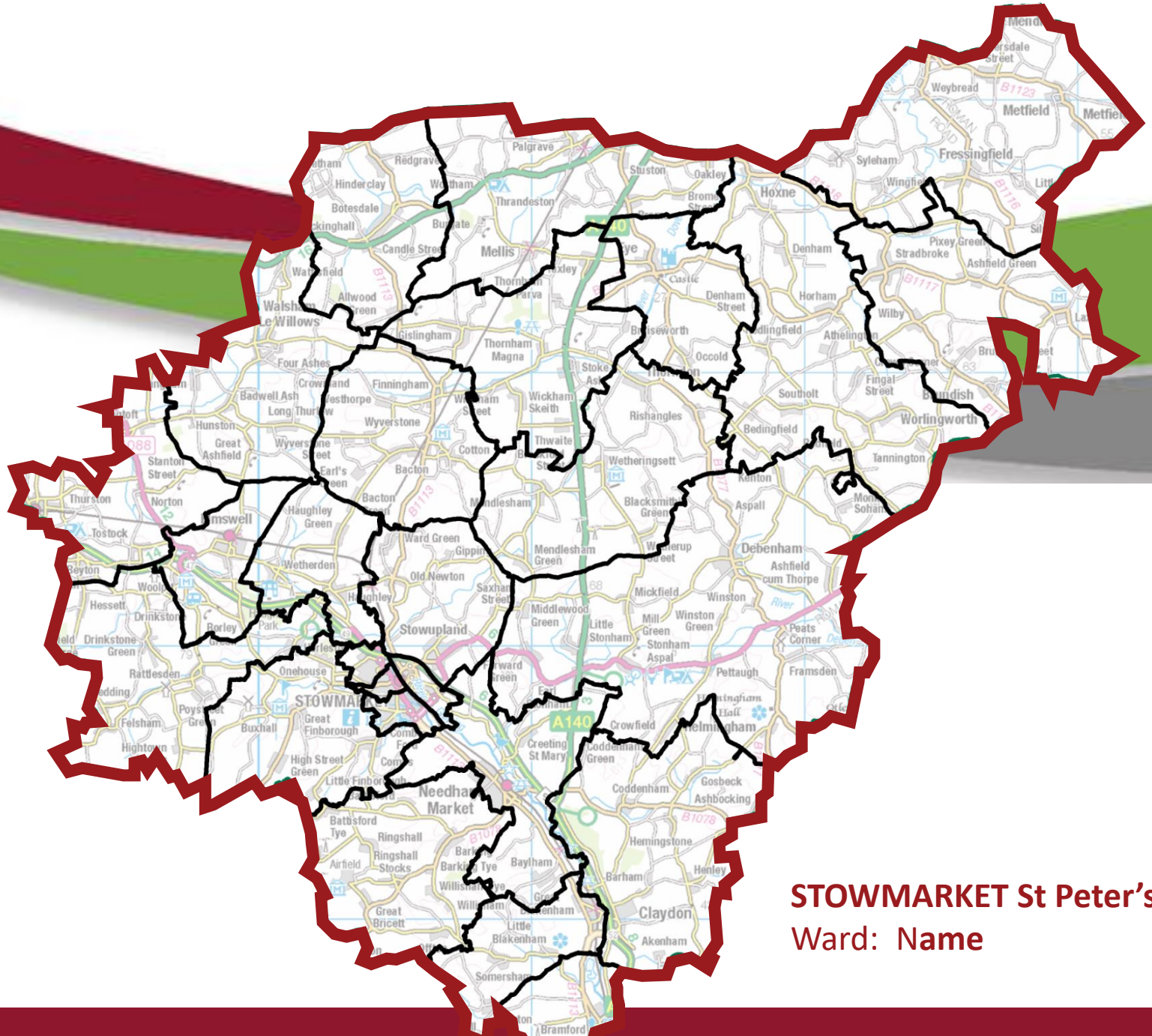
**Unit 1, Gipping Way, STOWMARKET**

Proposal:

**Change of use of premises from retail to hot food takeaway,  
installation of new shopfront and external plant**

**Mid Suffolk**  
**DISTRICT**

Page 46



**STOWMARKET St Peter's**  
**Ward: Name**



## Development Control Committee B

26 October 2022

This presentation provides an introduction and additional illustration of some of the points within the published committee report. It does not supplant the committee report. It acts merely as a springboard for debate.

All applications must be assessed on their own individual planning merits after having had regard to all material planning considerations

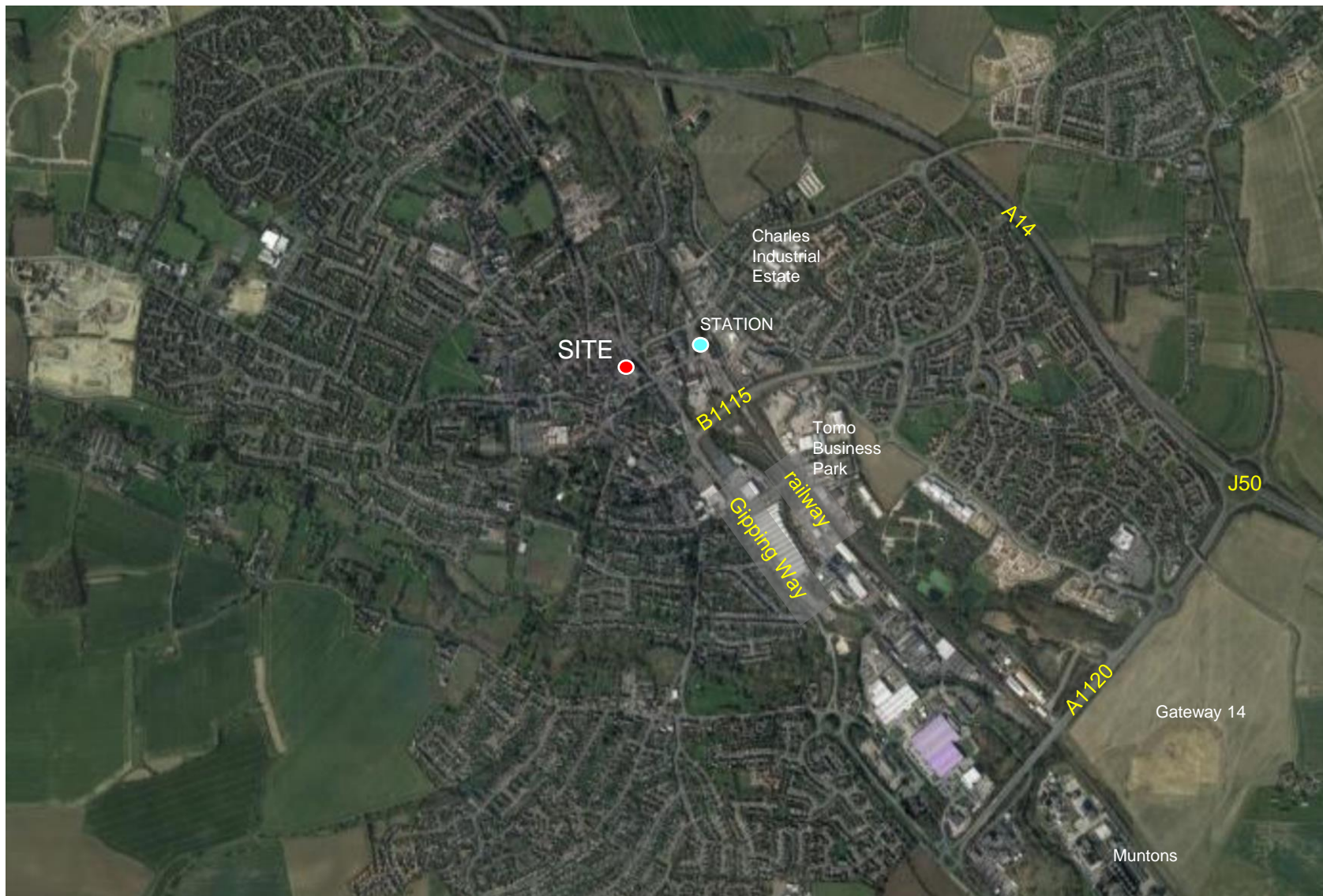


# Wider Geographic Context



# Local Context

slide 2



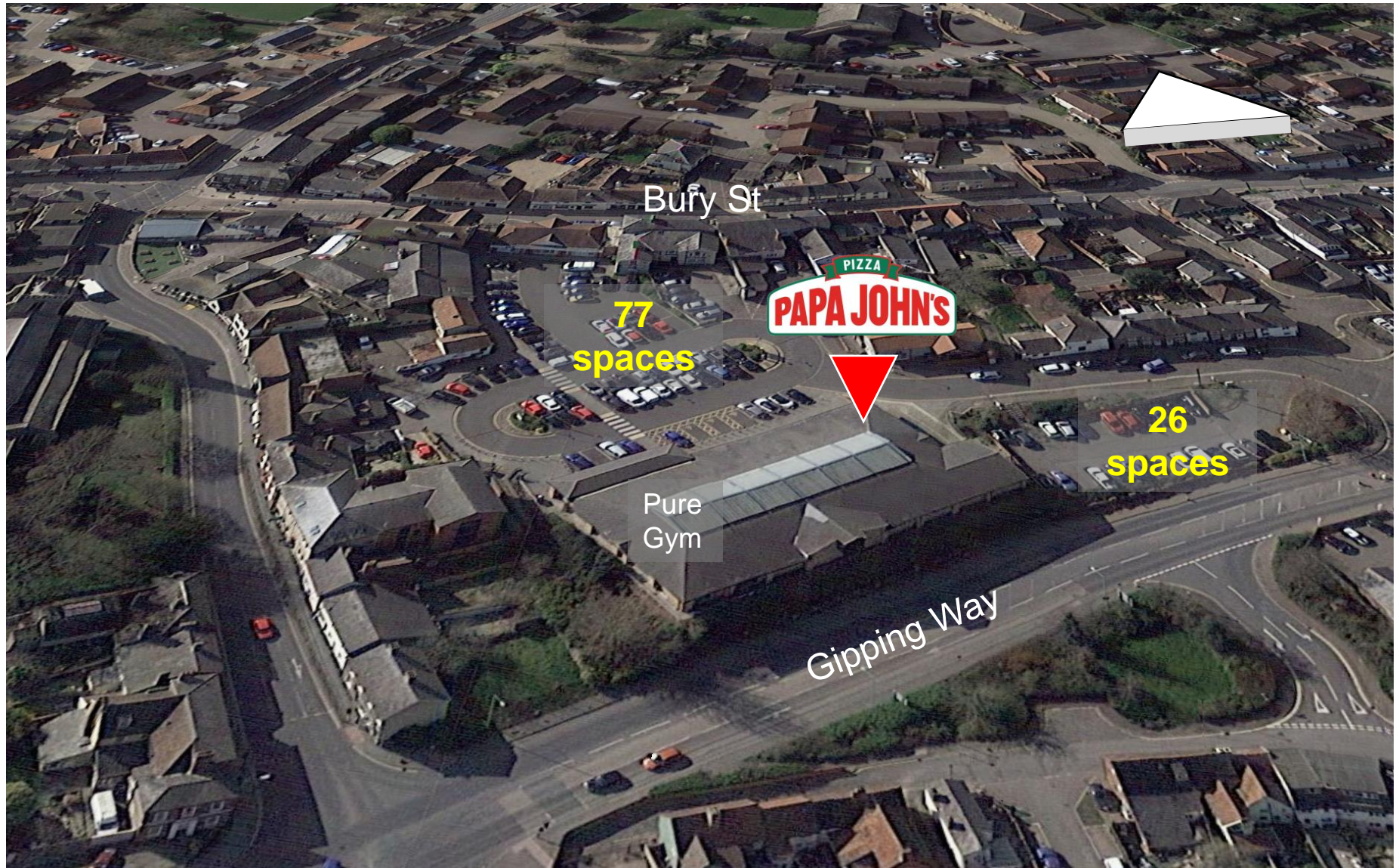


## Immediate Context

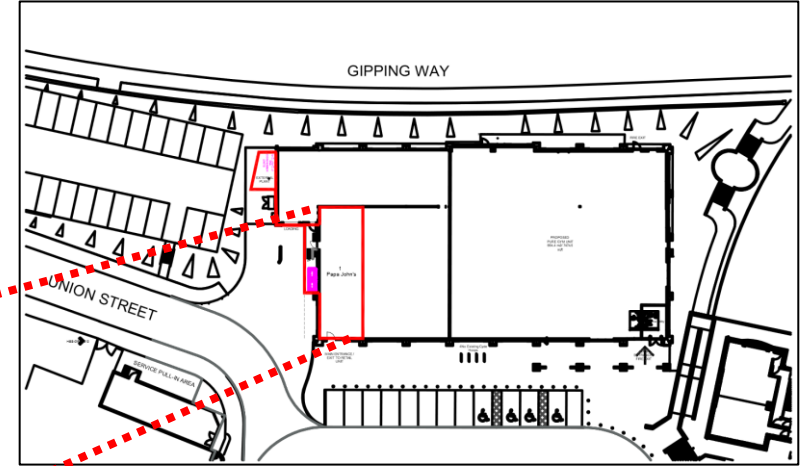
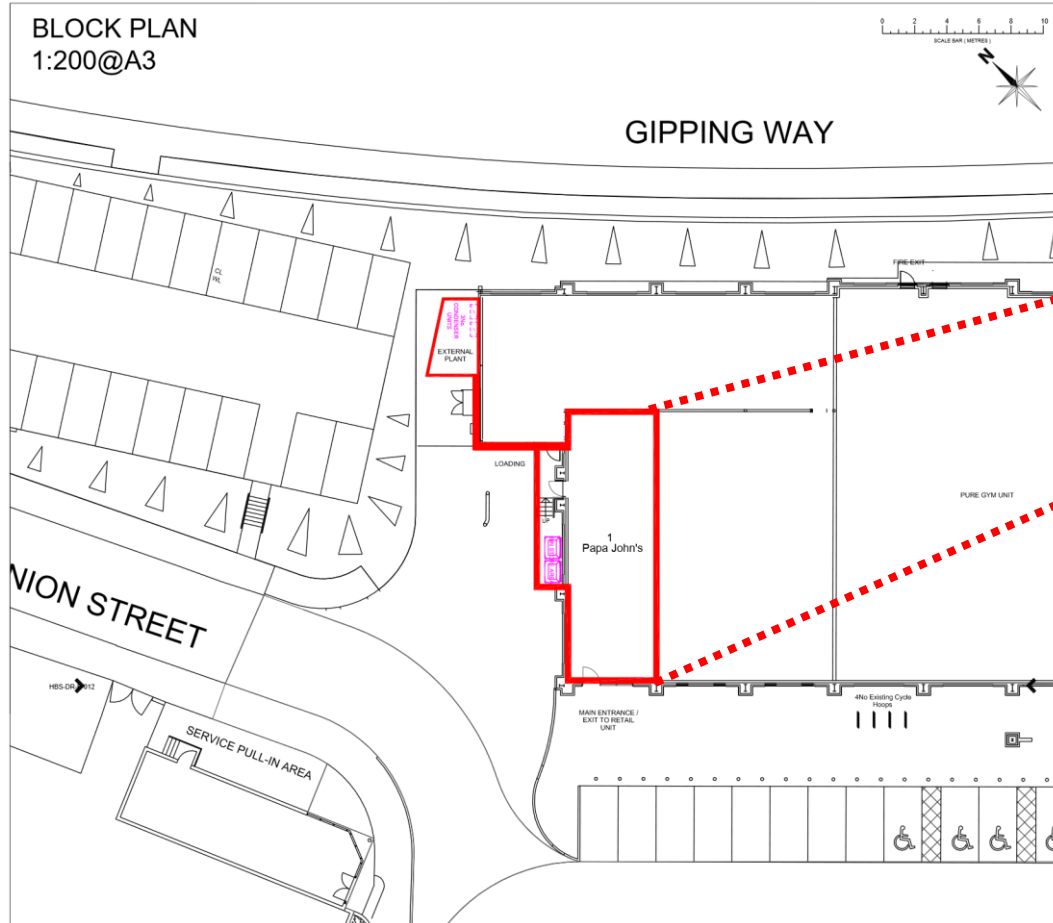
slide 3



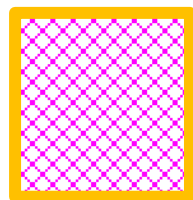




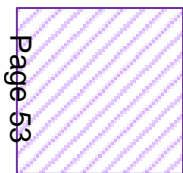
# Red line plan







application site



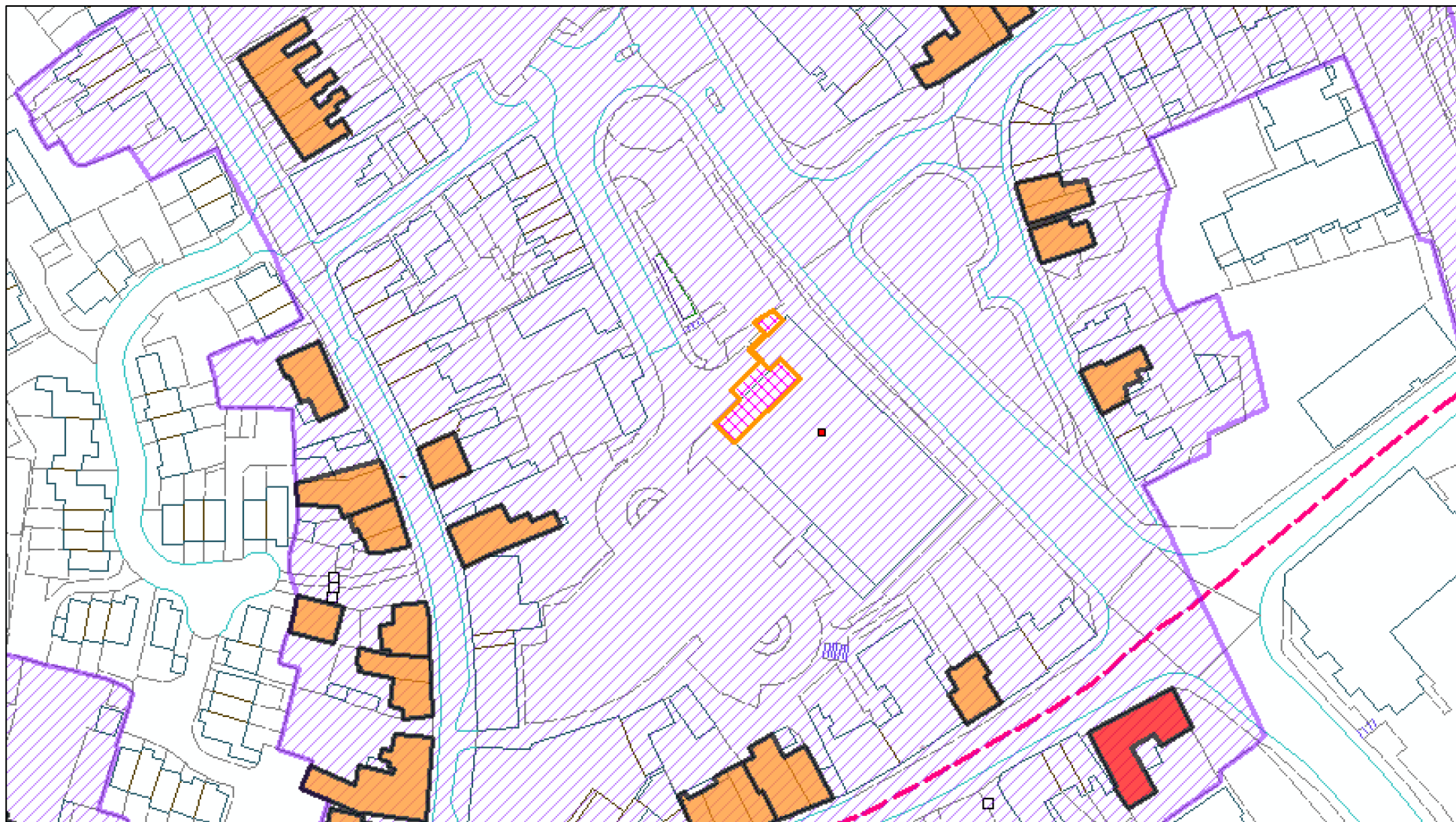
conservation area

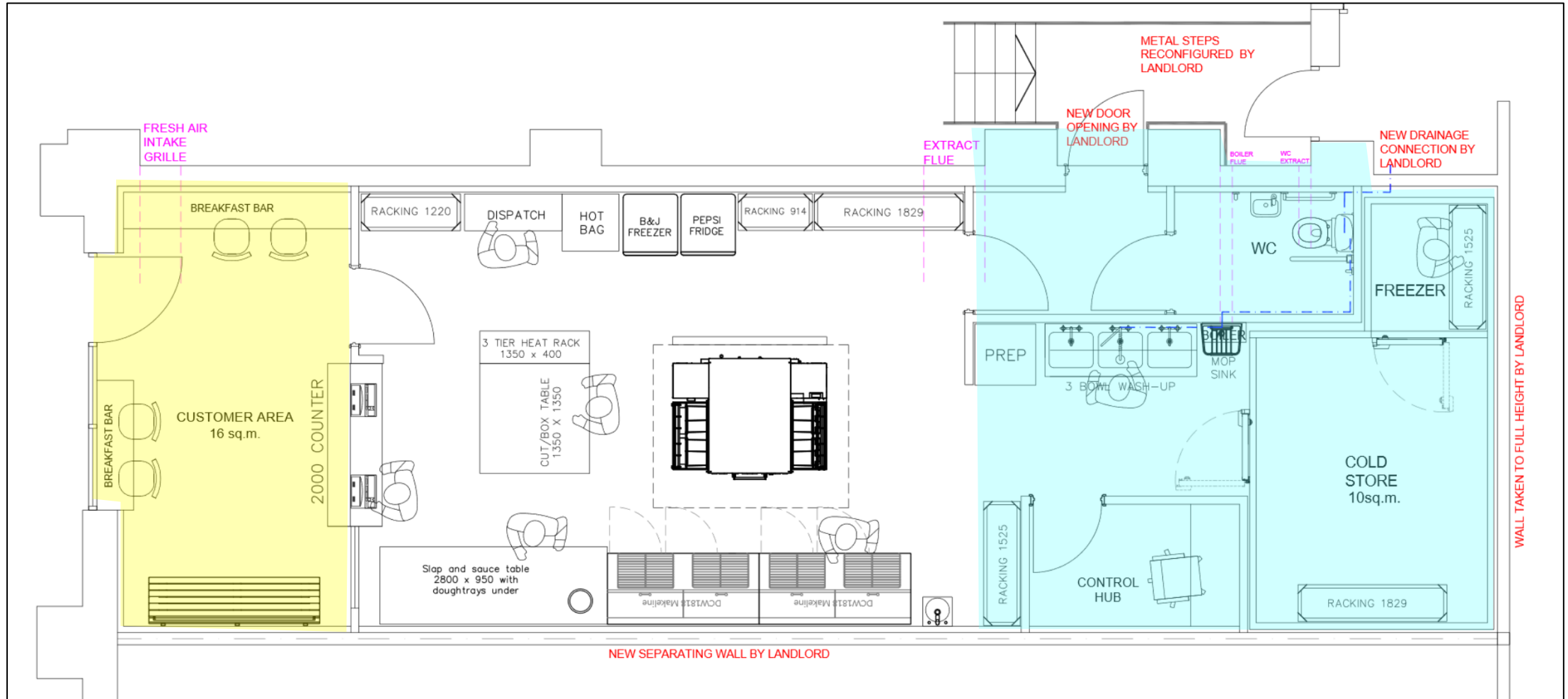


Grade II listed



Grade II\* listed





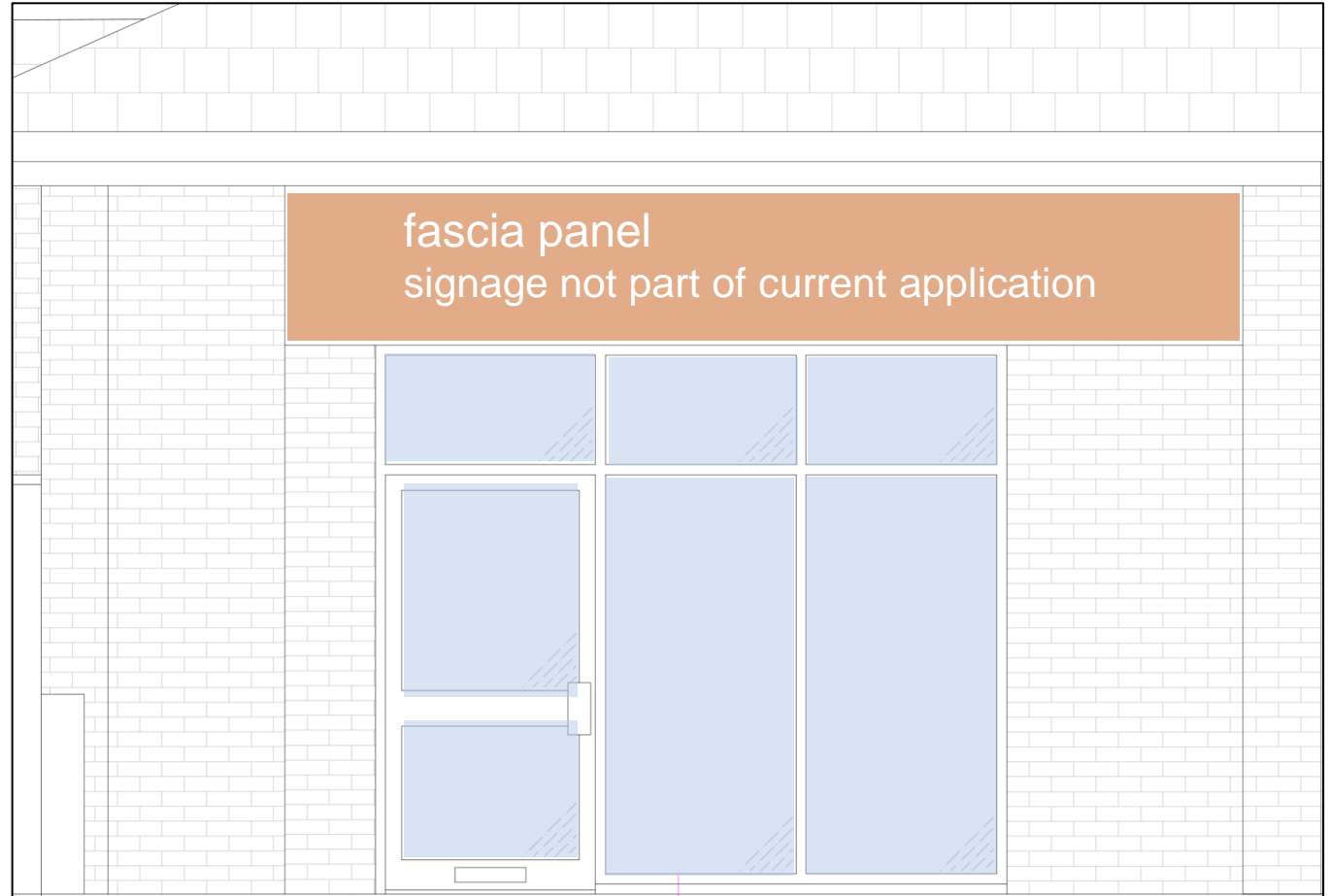
**CUSTOMER SPACE**

**COOKING and SERVING SPACE**

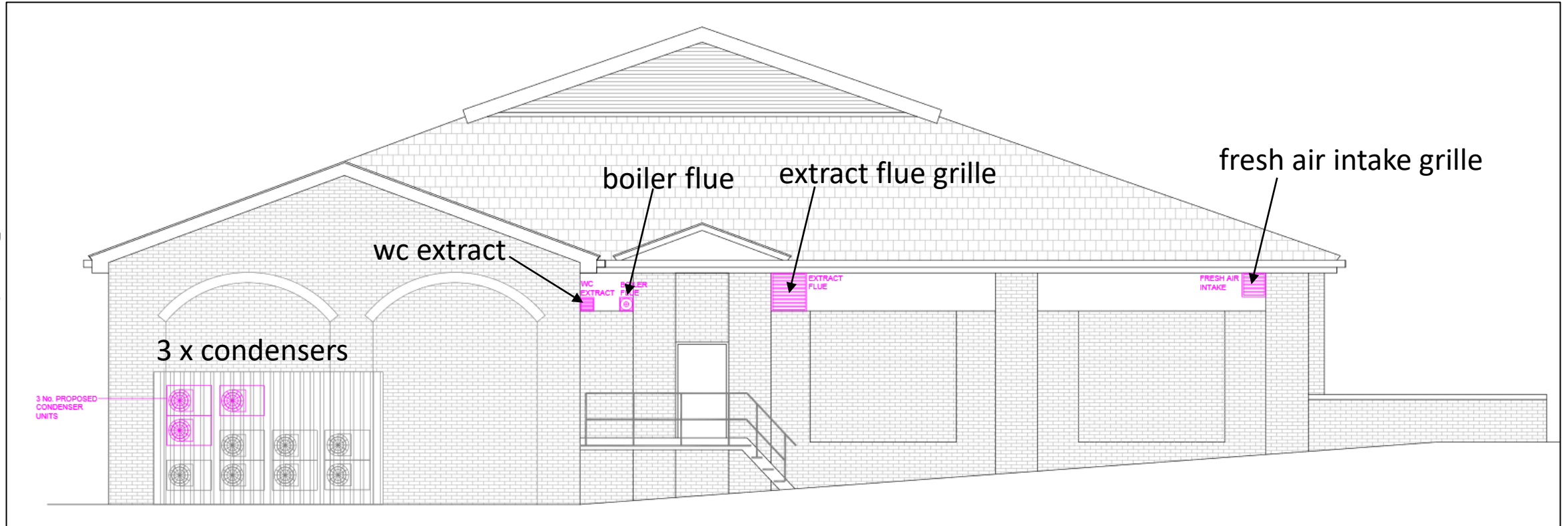
**PREPARATION and STORAGE**

# Proposed Shopfront

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## Proposed external plant



# Agenda Item 7b

## Committee Report

**Item No: 7B**

**Reference:** DC/21/05596

**Case Officer:** Jasmine Whyard

**Ward:** Claydon & Barham.

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

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## **RECOMMENDATION – GRANT FULL PLANNING PERMISSION**

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### **Description of Development**

Full Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Erection of fencing and landscaping and alterations to existing access to site

### **Location**

Land at Pippis Ford, A14 Slip off to A140, Coddendam, Suffolk IP6 8LJ

**Expiry Date:** 11/01/2022

**Application Type:** FUL - Full Planning Application

**Development Type:** Major Small Scale - All Other

**Applicant:** Construction Training Services

**Agent:** Mr Ben Elvin

**Parish:** Coddendam

**Site Area:** 3.31 hectares

**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):** Yes

**Has the application been subject to Pre-Application Advice:** Yes

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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The application is referred to committee for the following reason:

I. The application has been called into committee by Councillor Whitehead and Councillor Passmore and meets the criteria for a call-in request.

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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### **Summary of Policies**

#### **The Development Plan**

The following policies are considered the most relevant and important to the determination of this proposal. The policies are all contained within the adopted development plan for Mid Suffolk District which for the purposes of determining this application is comprised of: Mid Suffolk Core Strategy Focused Review (2012), Mid Suffolk Core Strategy (2008) and Mid Suffolk Local Plan (1998). All policies, save for CS1 and CS2 are afforded full weight in the determination process as they are considered consistent with the policies of the NPPF in accordance with paragraph 219 of that document. This will be explained further, later in this report.

- Mid Suffolk Core Strategy Focused Review (2012)

FC1- Presumption in Favour of Sustainable Development

FC1.1- Mid Suffolk Approach to Delivering Sustainable Development

- Mid Suffolk Core Strategy (2008)

CS1- Settlement Hierarchy

CS2- Development in the Countryside & Countryside Villages

CS3- Reduce Contributions to Climate Change

CS4- Adapting to Climate Change

CS5- Mid Suffolk's Environment

- Mid Suffolk Local Plan (1998)

GP1- Design and layout of development

CL2- Development within special landscape areas

CL8- Protecting wildlife habitats

E10- New Industrial and Commercial Development in the Countryside

E12- General Principles for Location, Design and Layout of Industrial and Commercial Development

HB1- Protection of Historic Buildings

T9- Parking Standards

T10- Highway considerations in development

T11- Facilities for pedestrians and cyclists

RT12- Footpaths and Bridleways

### **Neighbourhood Plan Status**

This application site is not within a Neighbourhood Plan Area.

## **Emerging Joint Local Plan Policies**

The emerging Joint Local Plan is currently at Regulation 22 (Examination), based on the current progress of the examination and outstanding issues to be examined, the plan continues to hold limited weight.

## **The National Planning Policy Framework**

The National Planning Policy Framework (NPPF) 2021 contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-taking purposes.

Particularly relevant elements of the NPPF include:

- Chapter 2: Achieving Sustainable Development
- Chapter 4: Decision-Making
- Chapter 6: Building a Strong, Competitive Economy
- Chapter 9: Promoting Sustainable Transport
- Chapter 12: Achieving Well-Designed Places
- Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Chapter 15: Conserving and Enhancing the Natural Environment
- Chapter 16: Conserving and Enhancing the Historic Environment

## **Other Considerations**

- Suffolk County Council- Suffolk's Guidance for Parking (2014 most recently updated in 2019)

The national Planning Practice Guidance (PPG) provides guidance and advice on procedure and elaboration of NPPF policies rather than explicit additional policy; however, it has been taken into account in reaching the recommendation made on this application.

## **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)**

- **Coddenham Parish Council**  
Object on the basis of 1) previously refused, 2) proposed screen fence of up to 2m is unacceptable, and 3) sheep farming will likely be removed as it does not require planning permission.

- **Needham Market Town Council**

Object on the basis of 1) situated in a tranquil area, 2) conflict with the River Gipping Walk, 3) numerous other commercial sites where the site could be located, 4) pollution, 5) ecological damage and 6) contrary to neighbourhood plan.

#### **National Consultee (Appendix 4)**

- **East Suffolk Drainage Board**

No objection. Recommend informatives.

- **Environment Agency**

No objection. Recommend informative.

- **National Highways**

No objection, subject to condition on providing access. Recommend informatives.

- **Natural England**

No objection.

#### **County Council Responses (Appendix 5)**

- **Archaeology**

No objection subject to conditions 1) written scheme of investigation and 2) post investigation.

- **Highways**

No objection subject to conditions 1) providing visibility splays, 2) providing parking and manoeuvring space, 3) electric vehicle charging information, 4) measures for prevention of surface water onto highway, 5) bin presentation and storage information and 6) construction management plan. Recommend informatives.

- **Fire and Rescue**

No objection subject to condition for the provision of fire hydrants.

- **Floods and Water**

No objection subject to conditions 1) surface water drainage implemented, 2) surface water drainage verification report and 3) surface water construction management plan. Recommend informatives.

- **Minerals and Waste**

No objection.

- **Public Rights of Way**

No objection and recommend informatives.

- **Travel Plan**

No comment.



## **Internal Consultee Responses (Appendix 6)**

- **Arboricultural Officer**

No objection subject to a condition requiring works to be carried out in accordance with arboricultural report. The trees proposed for removal are of limited public amenity value and/or are of poor condition.

- **Economic Development**

Support the application as it would develop and provide new skills and is unlikely to be suitable for an existing employment site. Locally infrastructure projects are expected to be worth £35 billion in the next 15 years. Skills shortages have been identified within the construction industry, compounded by Brexit. The site is well connected to the highway network and easy distance to public transport.

- **Environmental Health: Air Quality**

No objection.

- **Environmental Health: Noise, Odour, Light and Smoke**

No objection subject to conditions 1) site management plan, 2) assessment to ensure noise levels are kept to those projected, 3) restriction on noisy activities

- **Environmental Health: Land Contamination**

No comment.

- **Environmental Health: Sustainability**

No objection subject to condition on providing a scheme for water, energy and resource efficiency measures.

- **Heritage**

Identify that there would be a low level of less than substantial harm to designated heritage assets. Recommend harms are weighed with public benefits.

- **Place Services: Ecology**

No objection subject to conditions on 1) construction environmental management plan, 2) biodiversity enhancement strategy and 3) wildlife sensitive lighting design

- **Place Services: Landscaping**

Conclude that the overall landscape contribution of the site means it can accommodate change, however there would be localised visual impacts from the development of the site. Recommend conditions 1) soft landscaping implemented, 2) hard landscaping plan, 3) landscape management plan implemented

- **Public Realm**

No comment.

- **Waste Services**

No objection subject to ensuring that there is room for a refuse vehicle to manoeuvre around the site.

## **Other Consultee Responses**

- **Suffolk Preservation Society**

Object on the basis of 1) impact on Gipping Valley Landscape from intrusion into tranquil remote area 2) impact on designated heritage assets, 3) support economic development schemes for local jobs but the site is an entirely inappropriate location.

- **Stowmarket Ramblers**

Object on the basis of 1) development too high, 2) landscape impact, 3) overlooking, 4) affects enjoyment and safety of PROW.

## **B: Representations**

At the time of writing this report at least 17 letters/emails/online comments have been received. It is the officer's opinion that this represents 17 objections. A verbal update shall be provided as necessary.

Views are summarised below:

- Landscape impact (12)
- Inadequate access (11)
- Noise (11)
- Impacts to PROW (10)
- Out of character with the area (10)
- Affects local wildlife/ ecology (10)
- Increased traffic/ highways issues (9)
- Overlooking (7)
- Conflicts with district plan (6)
- Conflict with neighbourhood plan (6)
- Design (6)
- Pollution (6)
- Dominating/ overbearing (6)
- Sustainability (5)
- Loss of outlook (5)
- Better located on industrial/ brownfield land (5)
- Health and safety (4)
- Boundary issues (4)
- Conflict with NPPF (4)
- Light pollution (4)
- Loss of open space (4)
- Inappropriate in Conservation Area (3)
- Smells-odour (3)
- Development too high (3)
- Loss of privacy (3)
- Destruction of greenfield land (3)
- Drainage (3)
- Inadequate public transport (2)
- Trees (2)
- Scale (2)
- Lack of justification (2)
- Increase in pollution (2)
- Residential amenity (2)
- Building work (2)
- Overdevelopment of site (2)
- Application lacks information

- Fear of crime
- Undermines emerging Joint Local Plan
- Increased danger of flooding
- Further surveys required
- Inadequate parking
- Disturbance
- Loss of view
- Heritage impacts
- Surplus of employment land in JLP
- Vibration
- Imposed on residents
- Inadequate screening
- Incorrect application information
- Urbanisation
- Proposed highways works affect designated heritage assets
- Job creation is limited

(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**

This application is a resubmission of DC/21/00487. This previous application was refused on four grounds under delegated authority but was subject to a conditional call-in request.

The reasons are summarised below:

- Lack of information to justify the principle of development
- Impacts on landscape, amenity, and natural environment
- Impact from noise
- Lack of information in relation to flooding and drainage

Previously the Local Planning Authority adopted a precautionary approach in the absence of adequate information as to the overall operations of the site. The applicant has now submitted further information and amended the scheme to overcome and mitigate many of the issues previously raised.

It is now considered the benefits of the proposal outweigh the harms (even where considerable importance and great weight is attached to the heritage harm identified) and the recommendation and assessment has been updated accordingly as reflected within this report.

**REF:** DC/21/00487

Planning Application - Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site.

**DECISION:** REF  
14.09.2021

<b>REF:</b> 1378/12	Application for a new planning permission to replace an extant planning permission in order to extend the time limit for implementation. (Planning permission 1174/09 - Erection of stables and tack room)	<b>DECISION:</b> GTD 15.06.2012
<b>REF:</b> 1174/09	Erection of stables and tack room.	<b>DECISION:</b> GTD 17.06.2009
<b>REF:</b> 2612/06	Change of use of agricultural land to keeping of horses.	<b>DECISION:</b> GTD 30.04.2007
<b>REF:</b> 0468/04/	CHANGE OF USE OF BED AND BREAKFAST ACCOMMODATION TO DWELLING.	<b>DECISION:</b> GTD 27.09.2004

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## **PART THREE – ASSESSMENT OF APPLICATION**

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### **1. The Site and Surroundings**

- 1.1. The site extends 3.31 hectares and is solely comprised of grade 4 agricultural land (described as poor quality) and is within the parish of Coddendam. The site is entirely within the 'Countryside' as identified under policy CS1. The site is however adjacent to the A14 and accessed via the Beacon Hill Interchange down a private road which is hard surfaced. Agricultural land is located north, south and west of the site, but there some sporadically located dwellings within the locality.
- 1.2. The site is visually well-enclosed along its northern and eastern boundaries by mature hedgerows and trees, with the eastern boundary adjacent to the A14. The site is relatively open along its north-western boundary adjoining the River Gipping. There is an existing fence partially along the south-east of the site, with the southern boundary adjoining a private road leading towards the nearest dwellings.
- 1.3. There are no protected trees on site. In context of the site's immediate environs, the site is at a significantly lower level than the A14. The site is 7m lower at the western side than the eastern side and is 4m lower on the northern side than southern side. The site falls within the Gipping Valley Special Landscape Area. There are no nearby protected nature reserve or Sites of Special Scientific Interest (SSSI) and the site is not within any Area of Outstanding Natural Beauty. The site falls within a Mineral Consultation Area.
- 1.4. The site is not within any Conservation Area, however there are nearby listed buildings. To the north east (193 metres) is Grade II listed Needham Lodge (separate from the site by the A14), south (230 metres) is Grade II listed Pipp's Ford and north west (275 metres) is Pippins.
- 1.5. There is a Public Right of Way (PROW) (footpath 27) running through the centre of the site (north to south). The site is also visible from the western side of The Gipping via another Public Right of Way (footpath) which is part of the Gipping Valley River Path. There are a range of nearby ponds and Gallows Hill Quarry Gravel and Sand Workings to the southwest.

- 1.6. The site is primarily within Flood Zone 1 (low risk of fluvial flooding), however the western edge of the site marginally falls within Flood Zone 2 and Flood Zone 3 (medium and high risk of fluvial flooding). The site is at a very low risk of pluvial flooding.

## **2. The Proposal**

- 2.1. Overall, the site is to be split into two distinct parts, with the northern area (measuring 1.65 hectares) being used as an educational construction and agricultural training facility which would have a F1 use class. The southern area (1.66 hectares) would be separated by hedgerow from the northern area and is to be used for agricultural/ equestrian uses (sheep and horse grazing). As part of the development of the site associated landscaping, car parking, hardstanding and storage is to be provided.

The training to be offered on site comprises of:

### Classroom based

- General health and safety- first aid training
- Construction supervisory and management training
- Waste and recycling management training
- Environmental management training
- Agricultural training
- Quality assurance i.e., ISO 9000
- Logistics and HGV drive CPC

### Practical Training

- Construction plant and access equipment
- Agricultural plant equipment
- Summer maintenance (i.e., grass and hedge cutting)
- Street works
- Safe confined space entry
- Construction/ utilities civils courses
- ATVs (all terrain vehicles)

Alongside the main training centre building the following are also proposed on site within the northern area:

- Four temporary cabin buildings
- Container storage comprised of four containers grouped together
- Two car parks (providing 41 bay spaces) and plant parking area (all areas of hardstanding)
- Roller area
- Access road with a 1m wide footpath
- Generator Shed
- Crushed access route
- Telehandler training tower
- SuDS basin
- External bollard lighting and CCTV

In the southern area the following would be included:

- Stable Block
- Manure Storage Area
- Storage Shed

- Crushed concrete area for equestrian use
- Tarmacked access

2.2. Associated soft and hard landscaping (including fencing, gates, hedgerows and earth bank/wildlife corridor) is incorporated across the whole site. A range of environmental sustainability measures are also incorporated throughout the scheme, as discussed within section 7 of this report. Highway works to upgrade the existing access and accommodate the development are also proposed and are discussed further in section 5 of this report.

### 3. **The Principle of Development**

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

#### Policy CS1

3.2. Policy CS1 sets out a settlement hierarchy based on the services, facilities and connectivity within the district and accordingly directs all development sequentially towards the most sustainable areas in regard to their location. Under policy CS1 the site falls within the 'Countryside', with the closest settlement boundary being Needham Market (Town), located 0.73 miles southwest of the site. Whilst policy CS1 is restrictive of development in the countryside, it is permissive when working inter alia with policy CS2, and explicitly states that it is permissive of '*particular types of development to support the rural economy*', the types of development are expanded upon within policy CS2. Whilst the settlement boundaries have not been reviewed and policy CS1 lacks flexibility on other matters, in relation to the facts of this application, full weight can be attached to policy CS1, noting that it seeks to support the rural economy and is consistent with the approach within the NPPF and specifically paragraphs 84 and 85.

3.3. Broadly speaking, the proposal is considered '*to support the rural economy*' as expanded on in subsequent sections of this report and thus the proposal is considered to accord with policy CS1.

#### Policy CS2

3.4. Policy CS2 follows policy CS1 by expanding upon the particular types of compatible countryside development permitted in countryside locations. Similarly, to policy CS1, aspects of policy CS2's blanket approach to development in the countryside are inconsistent with the NPPF. However, in this instance one particular type of countryside compatible development defined under policy CS2 is '*new-build employment generating proposals where there is a strategic, environmental or operational justification*'. Policy CS2 is clearly flexible and does not preclude employment generating proposals in the countryside, consistent with paragraphs 84 and 85 of the NPPF. Policy CS2 is therefore considered to hold full weight for the purposes of determining this application.

3.5. As the construction/ training facility aspect of this proposal is a new-build employment generating proposal, both directly and indirectly, and sufficient strategic and operational justification has been given, as explored further under assessment of policy E10 below, the proposal accords with policy CS2.

3.6. The southern area of the site is proposed for the grazing of horses and sheep, this represents a mixture of equestrian and agricultural uses, which is again considered to be compliant with policy

CS2, which is permissive of agriculture, with equestrian uses also being characteristic of the countryside. The applicant's long-term aspirations for this part of the site is to use it for hobby farming. This aspect of the proposal is also compliant with policy CS2.

### Policy E10

- 3.7. Policy E10 works alongside CS2 in assessing the location of new industrial and commercial development and is considered to be broadly in accordance with the provisions of the NPPF, specifically paragraphs 84 and 85. Policy E10 seeks to direct new industrial/ commercial development to settlement boundaries unless an overriding need can be demonstrated for such development to be located away from such settlements and within the countryside. Where such need can be demonstrated assessment is guided by 6 key criteria:
- 1) The impact of the development on the surrounding countryside, including its landscape and wildlife features.
  - 2) The prospect of pollution including the effect on nearby watercourses and groundwater sources
  - 3) The amount of traffic generated and likelihood of unacceptable traffic movement, particularly lorries, on non-principal roads
  - 4) The loss of high-quality agricultural land
  - 5) The contribution to the rural economy
  - 6) The employment opportunities created for nearby communities
- 3.8. The applicant has provided a range of information to demonstrate how the proposal is to be delivered alongside the business's long-term aspirations, whilst demonstrating that there is an overriding need for the proposal to be in this countryside location. The proposal offers unique and exceptional circumstances that requires a countryside location but is also well-connected to a strategic transport network and nearby settlement.
- 3.9. The proposal is driven by a locally embedded business (Construction Training Services) which has well established connections with local and national businesses. The proposal represents the expansion of Construction Training Services as a business by seeking to deliver training in both practical and soft skills for a range of local and national businesses. A key aspect of the proposal and overall business, is to deliver a construction and agricultural training centre in a location which integrates, supports and emphasises the importance of the environment at all levels, whilst being accessible and with an appropriate land composition. As such there is a specific locational requirement for the centre to be in a rural but well-connected location in order to deliver outdoor training with easy access to nature.
- 3.10. A number of operational justifications have been provided in support of the proposal being located within the countryside. It is important that the proposal is well connected adjacent to the Beacon Hill Interchange which links the site to the A14 and A140, two key trunk roads. Based on industry norms and training to be delivered for a range of companies based around the UK, there is an operational requirement to be near to key trunk roads as a large majority of trainees travel by car.
- 3.11. The catchment for such training delivered on site is expected to be within a 50-mile radius. The applicant does however note a strong desire to encourage sustainable forms of transport once operational by encouraging travelling by train with the potential to establish taxi/ shuttle bus services from Needham Market Station (6 minutes' drive from the site). A travel plan is to be secured via condition.

- 3.12. Construction Training Services currently have 200 clients, such training must therefore be tailored to and supportive of their client's needs. Between 2019 and 2022, between 40 to 60 candidates per week were participating in training. With the creation of this proposed facility, it is anticipated that between 150 and 200 candidates would visit the facility per week. This is guided by the levels of interest that has been registered with Construction Training Services in this type of facility and courses.
- 3.13. Ensuring people can and are willing to attend training is imperative. Pitfalls of existing training centres is that they are located in congested locations. As such existing clients have expressed their desire for training to be delivered in an easily accessible and well-connected location.
- 3.14. There are currently no training centres like the one proposed in Suffolk, with the nearest being in Basildon, Kentford and Norwich. Existing centres have been unable to deliver practical outside training all year round based on clay ground conditions, which this site would overcome with its chalk land composition.
- 3.15. Beyond delivering skills, the training centre is likely to directly support the rural economy through trainees using local accommodation and restaurants, especially in Claydon, Needham Market and Stowmarket. Moreover, local companies will be used where possible to source plant and fulfil other requirements.
- 3.16. The applicant has presented a clear case underpinning their reasons behind choosing the site, alongside detailing the specific operational requirements attached to the business and the stakeholders involved in it. A condition forms part of the recommendation in order to restrict the proposed building's use to be exclusively an F1 use for the delivery of construction and agricultural training.
- 3.17. It is noted that several representations have been made that suggest that the proposal should be located elsewhere on brownfield land or within industrial sites. Existing commercial sites are typically comprised of a mixture of Class E (g), B2 and B8 uses. The proposed development could not be located within an existing employment site as it would conflict with and undermine the Council's employment strategy within industrial/ commercial business parks, owing to its F1 use. The development would take up in demand fit for purpose commercial space and would in any event require planning permission for a change of use if it were to be located within an existing employment site. Moreover, the operational requirements of the proposal could not be accommodated within the spatial and building constraints of conventional employment sites, nor would be it practical, owing to the deliver practical training which must be done in accordance with governing body's standards.
- 3.18. Whilst it is supported by local and national policy, such policy does not require brownfield land to be developed over greenfield land, nor is there a presumption against granting planning permission on greenfield sites.
- 3.19. The application therefore remains to be assessed against the six criteria of policy E10. Criteria 4, 5 and 6 is discussed within this section of the report. The remaining criteria (1, 2, and 3) is discussed in later sections of this report.
- 3.20. In regard to criterion 4, firstly and notably an area measuring 1.66 hectares is to be retained for equestrian/ agricultural use, the scheme therefore only represents a loss of 1.65 hectares of grade 4 agricultural land, which is considered of poor quality and does not fall within the best and most versatile agricultural land worthy of protection.



- 3.21. In regard to criteria 5 and 6, significant information has been supplied to demonstrate that whilst on site employment is likely to amount to around 15 jobs initially this may increase, and the broader value of the proposal is to upskill local people enabling them to contribute to the local and national economy through construction and agriculture.
- 3.22. It is envisaged that in future years, the possibility to recruit apprentices will be explored. The contribution to the rural economy is significant and based on the nature and size of the scheme, the employment generated directly on site is proportionate.

### NPPF

- 3.23. At a national level Chapter 6 of the NPPF is of particular relevance seeking to build a strong and competitive economy. Specific direction is given within paragraphs 84 and 85 as to supporting the rural economy.
- 3.24. More generally at a national level, paragraph 81 of the NPPF echoes this sentiment stating that, *“planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”*
- 3.25. Paragraph 84 a) of the NPPF states that planning policies and decisions should enable *“the sustainable growth and expansion of types of businesses in rural areas, both through the conversion of existing buildings and well-designed new buildings”*.
- 3.26. Paragraph 85 goes further stating, *“planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist”*.
- 3.27. The Council’s Economic Development Team are wholly supportive of the proposal. They noted that there will be some direct on-site job creation, albeit this is relatively limited, however the overall value of providing training and uplifting skills locally and nationally (through delivering training for national companies) is emphasised as of considerable public benefit and importance.
- 3.28. Based on the number of infrastructure projects within the region (totalling £35 billion), alongside a national shortage in construction skills, compounded by Brexit, the proposal offers opportunities for the local and national workforce to uplift and maintain skills as well as enabling people to change careers.
- 3.29. The Council’s Open for Business Strategy provides a useful starting point which demonstrates the aspirations of the Council in supporting the local rural economy. The strategy identifies key existing issues and challenges within the district, which include: lower skills level and educational attainment, lower levels of young people to recruit and poor rural infrastructure. There is a desire to raise the employability and skill levels of the workforce and improve productivity.

- 3.30. The information submitted demonstrates that the proposal is supportive of the Council's aspirations for powering economic prosperity in the district going forward.
- 3.31. A number of national and local companies have endorsed the proposed training delivered by the applicant (Construction Training Services) via signed supporting letters which have been submitted alongside the application. Such companies include: Hopkins Homes, Landex, SEH Ipswich Civil Engineering, Highway Assurance, A D Bly Construction, TRU Plant Hire Services, Holmes Plant and Construction, J.J. Sugrue Civil Engineering and Plant Hire, Richardson Haulage, ARC (additions recruitment consultants), Palmer Group, Brown Builders Building Contracts, Emmitt Plant, HDD, Gibbons Plant Hire, Capital Sky Demolition, Elan Civil Engineering, JB Turf and Landscapes, M V Kelly, CLR Groundworks, N.P.H Developments, The Lyndon Pallett Group, CPD Powerline and Newton and Frost Fencing.

#### Basket of Policies

- 3.32. As detailed above, policies CS1, CS2 and E10 are all considered to hold full weight in the determination of this application.
- 3.33. Policies CS4 and CS5 are further relevant in determining the acceptability of the principle of development on site, by assessing the relationship with existing development and the character of the locality, specifically with regard to flood risk, pollution, landscape, biodiversity and heritage. These policies hold full weight as they are consistent with the policies of the NPPF. Assessment of the application against these policies is discussed in subsequent sections of this report. It is however noted at this stage that there is a level of landscape and heritage harm which cannot be mitigated, and thus the proposal conflicts with aspects of policy CS5.
- 3.34. The most important policies relevant to the determination of this application are considered to hold full weight.

#### Summary

- 3.35. The southern area of the site is proposed for the grazing of horses and sheep, this represents a mixture of equestrian and agricultural uses. It is the applicant's long-term intention to use this area of land as a smallholding for hobby farming. These uses are in accordance with policy CS1 and CS2 and are characteristic of the countryside location. The principle of these uses is therefore acceptable.
- 3.36. In regard to the construction/ agricultural training facility, the proposal accords with policies CS1, CS2 and E10 based on the strategic and operational justification given. Owing to the landscape and heritage harm that would arise that cannot be mitigated, there is also conflict with some, but not all, aspects of policy CS5. On balance the principle of development of the training centre is considered to be acceptable.
- 3.37. The information and evidence submitted as part of the application has demonstrated that there would be significant direct and indirect economic and social public benefits of the scheme. Moreover, a large proportion of the site will remain free of any operational development, and as this report will go on to discuss in section 7, the environmental credentials of the scheme are also considered to be of a high standard, providing both ecological benefits and environmentally friendly energy generation. The proposal represents sustainable development as per policies FC1 and FC1.1 and paragraph 8 of the NPPF.

3.38. The principle of development is therefore acceptable.

#### **4. Nearby Services and Connections Assessment of Proposal**

4.1. The site is located just off of the Beacon Hill Interchange, with easy access to the A140 and A14 trunk roads. The nearest train station to the site is Needham Market, which is 1.5 miles northwest.

4.2. Footpath 27 (PROW) runs through the centre of the site. SCC's PROW Team raised no objection to the proposal subject to a range of informatives, which are reflected in the recommendation. Footpath 27 would not be obstructed across the site and would be retained for recreational use in accordance with Local Plan policy RT12 and paragraph 100 of the NPPF. It is noted that Footpath 27 is obstructed further along its route in adjacent land outside of the applicant's control.

4.3. In the event that fences, gates or hedgerows were proposed along the PROW, these would be subject to a separate consent that would have to be sought from SCC PROW Team post planning.

#### **5. Site Access, Parking and Highway Safety Considerations**

5.1. The proposal includes provision to upgrade the junction between the existing private road and the Beacon Hill Interchange roundabout. As part of the upgrades the junction radius is to be increased 10.67 metres and a splitter island is to be created on the junction to ensure vehicles turn left onto the roundabout. An existing timber post and rail fencing and lamp column to the east of the junction are to be repositioned further south back from the junction onto the Beacon Hill Interchange in order to facilitate increased visibility splays to accommodate the intensification of use. New road markings are to be painted and existing ones refreshed, alongside the erection of new signage on the slip road and next to the access. Such upgrades will be subject to a section 278 Agreement, which is a separate consent that the applicant will be required to apply for post planning in order to carry out the proposed upgrade works within the highway and to ensure they are built to an adoptable standard. A planning condition is also recommended to ensure the required works are carried out prior to first use.

5.2. National Highways assessed the application in relation to its impact on the A14 and A140 trunk roads. National Highways recommended a condition for the proposed upgrades to the access to be implemented prior to first use. SCC Highways also assessed the application in conjunction with the comments made by National Highways. A Transport Statement, Road Safety Audit and access design revisions have been made during the course of the application to overcome previous concerns. SCC Highways have recommended several conditions in addition to the recommended condition by National Highways, these are all recommended to be imposed as reflected within the recommendation.

5.3. The private road adjoining the roundabout and leading to the site would also be widened to 5.5 metres.

5.4. Within the confines of the site a 6-metre-wide access road with a 1-metre-wide footpath running alongside is proposed, which travels along the eastern boundary of the site providing access to the car parking areas and for less frequent access to the southern equestrian land. 1-metre-high lit bollards are proposed to the access road. A sign is proposed along the existing private road adjoining the site to the east, to ensure traffic associated with the training centre does not travel past the site.

- 5.5. 41 parking spaces are to be provided on site, with a plant parking area, container storage and roller area provided also provided to ensure adequate storage space is provided alongside parking for vehicles. The plant parking area would comprise of hardstanding adjoining one car park and would measure 30 metres by 30 metres.
- 5.6. A Travel Plan is recommended to be secured via condition which would ensure that there is a genuine choice of transport modes, specifically active and sustainable transport options, open to staff and visitors.
- 5.7. The proposal would achieve safe and suitable access for all users and the local highway network would not be impacted to a severe degree. The proposal would thus accord with Local Plan policies T9 and T10 and paragraphs 105, 110 and 111 of the NPPF.

## **6. Design and Layout**

- 6.1. The main training building would be located along the eastern boundary of the site and would have a low profile pitched roof, measuring 4.5 metres to the ridge, 2.5 metres to the eaves, 30 metres in width and 20 metres deep. The training building would be constructed from black vertical ribbed cladding with brickwork plinth (TBS Farmhouse blend) elevations, composite panels and PV panels on the roof with black uPVC windows and doors. The training building would comprise of one office area, entrance lobby, three WCs, two storage areas, six classrooms and canteen area.
- 6.2. The telehandler training tower would be located within the centre of the northern boundary and would measure 9.95 metres in overall height (including handrail), 3 metres in width and 3 metres in depth. Whilst this is the tallest structure proposed, owing to the fall in land levels, it would visually appear lower than the main training building. Whilst it is the tallest structure it is of an open construction consisting of steel bars, minimising its overall visual impact.
- 6.2. The container storage is comprised of four containers grouped together measuring a total of 6 metres in width, 16 metres in length and 2.6 metres in height which will provide permanent storage capacity on site.
- 6.3. Five hired temporary cabins are incorporated into the scheme for use as classrooms, office and toilet, with four of them measuring 9.6 metres in length, 3 metres in width and 2.6 metres in height and one measuring 4.8 metres in length, 2.7 metres in width and 2.6 metres in height. All temporary cabins would be used during the construction period to deliver the training prior to the main training building being made functionally available. It is proposed that a condition is imposed to ensure the cabins are removed from site within a year from the date of commencement.
- 6.4. A small sound proofed shed with single pitched roof (2.5 metres in width, 4 metres in length and a maximum of 2 metres in height) would be located to the north-eastern corner of the site to house a generator.
- 6.5. The proposed access road, both car parks, plant car parking area and crushed access route would be the main hardstanding areas in the northern half of the site, all of which would be constructed from crushed subbase with tarmac plannings over to reduce dust. There would also be a crush concrete area in the southern half of the site for equestrian use. All hardstanding is positioned to the outer edges of the site, retaining grassland for the largest proportion of the site.
- 6.6. The training to be delivered is in accordance with specific awarding bodies, including Construction Plant Competence Scheme (CPCS) and National Plant Operators Registration Scheme

(NPORS). As such some of the aspects of the site (such as the roller area and telehandler) must therefore be designed and constructed to specified standards.

- 6.7. The stable block would be located within the centre of the southern boundary and measure 4.23 metres to the ridge, 2.5 metres to the eaves, 11 metres wide and 11 metres deep. The manure storage area would measure 3 metres wide by 2 metres deep. The storage shed would be adjacent to the stable block and measure 3.775 metres to the ridge, 2.25 metres to the eaves, 6 metres deep and 6 metres wide. The stable block and storage shed would be constructed from natural timber boarding with corrugated roof panels and PV panels. All of these buildings/ structures would be located within the crush concrete area.
- 6.8. The proposed training facility and stable buildings would be designed to reflective of their functional use but would nonetheless both adopt a sympathetic utilitarian appearance.
- 6.9. The proposal would accord with Core Strategy policy CS5, Local Plan policies GP1 and E12 and paragraph 130 of the NPPF.

## **7. Sustainability Measures**

- 7.1. The site would incorporate a number of sustainability measures:
  - Energy efficient windows and high levels of insulation incorporated into training building to secure high levels of natural lighting and regulate temperature.
  - Solar PV panels are proposed on the roof of the training building and stable block for generating solar power which is intended to deliver the electricity and heating for the site. Prior to these becoming operational/ in the event of requiring a backup a small silent run diesel generator will be used.
  - All internal and external lighting on site would be in the form of low energy and glare LEDs.
  - Biodiversity enhancements proposed in the Preliminary Ecological Appraisal
  - All materials and trees on site are to be/ have been sourced from within a 15-mile radius of the site
- 7.2. Whilst building regulations would ensure the training building is insulated to a certain standard, in order to further reduce energy usage, these standards will be exceeded where financially possible during the construction of the building. There are also ambitions to recycle as much water for internal and external use via a recyclable grey water system.
- 7.3. The specific details of these measures are recommended to be secured via condition and will be reviewed by the Council's Sustainability Team. Specific biodiversity measures are also secured via condition and will be reviewed by the Council's Ecology Team.
- 7.4. All plant and equipment used on site will be hired from three local plant hire companies, with equipment to be low emission, low noise and low vibration, operating on site primarily using an 'eco mode'. It is further noted that such equipment is moving towards electric power source.
- 7.5. The proposal would thus accord with Core Strategy policies CS3 and CS4 and paragraph 157 of the NPPF.

## **8. Landscape Impact, Trees, Ecology, Biodiversity and Protected Species**

- 8.1. Along the western boundary of the site, a wildlife corridor with new earth bank and tree/ shrub line is proposed. This would adjoin an existing 40-metre-long fence (2-metre-high fence panels slotted

between concrete posts and gravel boards) which is set back 1 metre from the western boundary with hedgerows in front and is to be retained. An existing 5 bar field gate would be retained along the western boundary.

- 8.2. Alongside the existing western fence, an existing close boarded fence measuring a maximum of 2 metres in height is to be retained along a short section of the southern boundary adjoining an existing access. These fences were erected under permitted development rights and did not require planning permission but are shown on the plans for completeness.
- 8.3. A 1.2-metre-high 3 bar field fence and hedgerow is proposed running east to west through the centre of the site to demarcate the training facility from the grazing land.
- 8.4. A number of tree clusters have already been planted around the site, with existing trees to be retained including a mature row of conifer trees along the eastern boundary.
- 8.5. Lighting will be kept to a minimum at all times, with minimal lighting left on for security purposes outside of operating hours around the car park and access road. The access road would also be secured to the north-eastern corner via a 2-metre-high close boarded fence with gates.
- 8.6. A Preliminary Ecological Appraisal was submitted with the application, which has been assessed by Place Services Ecology in regard to the potential impacts on designated sites and Protected and Priority Species and Habitats. They have raised no objection subject to a range of conditions to mitigate impacts on the River Gipping and Protected and Priority Species alongside securing biodiversity enhancements, all of which are recommended to be imposed. Ecological measures were proposed within the submitted Preliminary Ecological Appraisal which are to be secured via condition in order to achieve biodiversity net gain on the site.
- 8.7. Policy CL2 states, *'within Special Landscape Areas, particular care will be taken to safeguard landscape quality, and where development does occur it should be sensitively designed, with high standards of layout, materials and landscaping'*.
- 8.8. A Landscape and Visual Appraisal, Soft landscaping plans, a Landscape Management Plan and Arboricultural Report have been submitted following earlier comments made by Place Services Landscaping. Place Services Landscaping have reviewed this additional information and accept the methodology that has been used in assessing the overall landscape impacts arising from the development.
- 8.9. Whilst the site falls within the Gipping Valley Special Landscape Area, in assessing the site's contribution to overall landscape character Place Services Landscaping state, *"though the site and the surrounding landscape is designated at the local level and in isolation, the site's landscape condition is considered 'ordinary' due to intrusive elements including infrastructure which means that the area has the ability to accommodate change"*.
- 8.10. Place Services Landscaping go on to assess the visual effects of the development which are the *"result of the sensitivity of visual receptors (people who will experience changes to existing views) to the proposed development and the magnitude of those changes"*. In accounting for these public views (not private views which are not a material planning consideration), Place Services Landscaping concluded that *"on completion of the development after 15 years, there would be some adverse visual effects but only in the immediate proximity of the site."* One such example of the moderate adverse visual effect would be on the Gipping Valley River Path given the change of character to an outlook that would be more suburban.

- 8.11. The overall impacts on landscape and visual amenity arising from the development would be adverse impact on visual effects which are confined within immediate proximity of the site, as opposed to wide ranging impacts in landscape character terms. Visual effect impacts of the development have been mitigated where possible and through additionally recommended conditions (as reflected in the recommendation section of this report). In conclusion there will be a level of adverse impact and harm arising from the development in respect of visual effects, which must be weighed against the overall merits of the scheme.
- 8.12. From the perspective of ecology and arboricultural impact, the proposal would accord with Core Strategy policies CS4 and CS5, Local Plan policy CL8 and paragraphs 174, 175 and 180 of the NPPF. However, the proposal would result in a level of landscape harm conflicting with Core Strategy policy CS5, Local Plan policy CL2 and paragraph 174 of the NPPF. As discussed within the overall planning balance and conclusion, in exercising a planning judgement it is considered that the landscape harm is outweighed by the merits of the proposal.

## **9. Land Contamination, Flood Risk, Drainage and Waste**

- 9.1. The Council's Environmental Health Team raised no objection from the perspective of land contamination, noting the site's existing and historical use.
- 9.2. There is an existing water main which is suitable for the site to connect into. Foul water is to be disposed either by septic tank or Klargestor type treatment plant.
- 9.4. SCC Floods and Water assessed the submitted Flood Risk Assessment, Drainage Strategy and SuDs location and SuDS Risk Assessment and raised no objection.
- 9.5. The Environment Agency assessed the application from the perspective of fluvial flood risk arising from the River Gipping and raised no objection.
- 9.6. Whilst the site marginally falls within vulnerable Flood Zones (2 and 3) the operational development proposed is entirely within Flood Zone 1 and is also at a very low risk of pluvial flooding. The proposal would therefore be safe for its lifetime and would not increase flood risk elsewhere.
- 9.7. The proposal would accord with Core Strategy policies CS4 and CS5 and paragraphs 159, 167, 169 and 174 of the NPPF.

## **10. Heritage**

- 10.1. The Council's Heritage Team provided full comments on the application and identified that the proposal would cause:
- A low level of less than substantial harm to the setting of Pipp's Ford (Grade II listed), a designated heritage asset, because it would erode the rural character of the wider setting of a listed farmhouse. There would thus be a very low level of less than substantial harm to the significance of Pipp's Ford.
  - A low level of less than substantial harm to the setting of Pippins (Grade II listed), a designated heritage asset.
  - A low level of less than substantial harm to the setting and thus significance of non-designated farm buildings associated with Pipp's Ford.
- 10.2. The full comments are as follows:

*“The proposal is an amended version of the scheme refused under reference DC/21/00487. The principal revision is that the layout is adjusted so that one of the parking areas is moved to the eastern boundary. In terms of potential heritage impacts, my view is that the revision does not materially change the scheme’s impact on heritage assets. The following comment is essentially repeated from the earlier application.*

*The site lies adjacent to the slip road from the A14 westbound to the A140 roundabout, and slopes down generally to the west. Close to the south west corner of the site is a group of farm buildings converted to residential use. To their south west stands Pipp’s Ford, a listed farmhouse associated with the farm buildings. The farmhouse is somewhat secluded among trees, but more open towards to the farm buildings. As an open area of undeveloped land, the site makes a significant contribution to the setting of the historic farm buildings, and to the setting of the listed farmhouse itself. As buildings that historically had an intimate functional relationship with farmland around them, the open land contributes to appreciating their historic significance.*

*To the north west of the site stands Pippins, listed at Grade II. Given the distance from the site, the closer position of the roundabout, and the line of tree growth to the south, the site makes little contribution to the setting of this listed building.*

*The proposal has two elements – a building and associated development providing training, and provisions for grazing for horses, with ancillary structures. The training building is towards the north east corner of the site, some 190m from the farm buildings, with grazing in the southern half. The building itself would be a rather functional structure with broad footprint and shallow roof pitch reaching 4.5m at the ridge. Similarly, the scaffold tower and storage container would appear incongruous in the setting of historic buildings.*

*Of more immediate concern would be panel fencing proposed at the boundary shared with the historic farm buildings, and close-boarded gates on the south boundary near the stable, which would adversely impact on the rural setting. There would also be panel fencing to the north east boundary, and close-boarded fence and gate to the entrance.*

*In my view the proposal would have a low impact on the setting of Pippins, not resulting in harm to its significance. Impact on the setting of Pipp’s Ford would also be low, resulting in harm at a very low level to the significance of the listed building. Impact on the setting of the non-designated farm buildings would be a little higher, with harm to their significance as non-designated assets at a low level.*

*If the proposal receives a positive recommendation, it seems likely that my concerns on boundary treatments could be addressed through a landscaping scheme.”*

- 10.3. As a level of harm to designated heritage assets (Pipp’s Ford and Pippins), regardless of the level, has been identified, paragraph 202 of the NPPF is thus engaged. The statutory duties within the Listed Buildings Act impose a strong presumption against granting planning permission where harm is identified, and harm of any quantum is a matter of considerable importance and weight.
- 10.4. Paragraph 202 requires harm to designated heritage assets to be weighed against public benefits. In this instance officers are satisfied that the creation of a construction training facility and the social and economic benefits that would result, as outlined within section 3 of this report, are significant enough public benefits to outweigh the harm identified.



- 10.5. In regard to the harm identified to the significance non-designated heritage assets, paragraph 203 of the NPPF does not require harm to be weighed against public benefits as such test does not exist like it does in paragraph 202. Paragraph 203 instead requires such harm to be taken into account and a *'balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.
- 10.6. Such harm to all identified assets, designated or otherwise, nevertheless stands to be considered again in the overall planning balance alongside the benefits in section 13.
- 10.7. The Council's Heritage Team suggested that a condition on boundary treatments may be required, this is not considered necessary and is not included within the recommendation, noting that the fencing along the western and southern boundaries has already been erected under permitted development rights and is included on the plans for completeness.
- 10.8. There is thus tension with Core Strategy policy CS5 in so far as there would be harm to heritage assets, such harm is however considered to be outweighed by public benefits, and for those reasons given it otherwise complies with Local Plan policy HB1 and the paragraphs of the NPPF in so far as clear and convincing justification has been given for the harm arising.

## **11. Impact on Residential Amenity**

- 11.1. The nearest proposed operational development associated with the F1 use class proposed under this application is approximately a minimum of 150 metres away from the nearest dwelling. Notably there is also an operational quarry (Gallows Hill Quarry Gravel and Sand Workings) approximately 176 metres away from the nearest dwellings to the site. Most significantly however is that traffic noise from the A14 can be heard from all corners of the site.
- 11.2. A Noise and Vibration impact Assessment was supplied with the application, with environmental sound levels taken at the boundary of the nearest noise sensitive location. It was concluded that vibration levels arising from the development will not be readily perceptible and that noise may be heard but would not be of a level that is unacceptable or would result in a change of behaviour or attitude. It is acknowledged that there may be some change in the acoustic character of the area, however this would not be to a level to alter the perceived quality of life.
- 11.3. As the plant is used for training purposes it does not run at full capacity as if it were on a construction site. The telehandler and roller are the only two items of plant which have reversing beepers on them, these will be disconnected when on site. This is proposed to be conditioned.
- 11.4. Appropriately bound surfaces are proposed around the site to reduce the potential of dust creation. The access road and car park would be crushed subbase with tarmac plantings over. Moreover, as the site would be used for training purposes, the risks of dust pollution are significantly lower than if the site was an operational construction site.
- 11.5. The proposal would accord with Core Strategy policy CS4, Local Plan policies H16 and H17 and paragraphs 126 and 130 of the NPPF.

## **12. Parish Council Comments**

- 12.1. Both Needham Town Council and Coddendam Parish Council raised a number of objections, which have primarily been addressed within the body of this report. The matters that have not been previously addressed are assessed below.
- 12.2. Needham Market Town Council did however raise an objection on the basis that the proposal is contrary to their Neighbourhood Plan, for the avoidance of doubt the site lies entirely outside of the Neighbourhood Plan Area.
- 12.3. Coddendam Parish Council also raised an objection in regard to the removal of sheep from the proposal in the future as they do not require permission, whilst this is true, the southern portion of the land could only be used for either equestrian or agricultural use in the future unless planning permission as sought otherwise.

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## **PART FOUR – CONCLUSION**

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### **13. Planning Balance and Conclusion**

- 13.1. Decision taking begins with the development plan and it is of vital importance that planning decisions are plan-led. The NPPF, an important material consideration, reiterates this fundamental point.
- 13.2. The basket of policies identified hold full weight, of specific importance and relevance are Core Strategy policies CS1, CS2, CS4 and CS5 and Local Plan policies CL2, E10 and HB1.
- 13.3. The policy is compliant with a range of policies which are permissive of this type of development within the countryside (CS1, CS2 and E10). However, the site is undeniably in a particularly sensitive part of the district within a Special Landscape Area, and a level of landscape harm is inevitable. A moderate adverse impact has been identified to visual effects within immediate proximity of the site, but no wider, with the wider area capable of accommodating change in landscape terms. The identified impacts have been mitigated as far as reasonably practicable given the nature of the development, however there will be a residual level of adverse impact on visual effects. This therefore represents non-compliance with the plan in regard to Core Strategy policy CS5 and Local Plan policy CL2 which must be weighed in the overall planning balance.
- 13.4. Whilst there is some tension with policy CS5 in regard to heritage harm, for the reasons given within sections 3 and 10 of this report. Notwithstanding that any level of harm is identified as a matter of considerable importance and weight, the proposal otherwise complies with policy HB1 and the paragraphs of the NPPF as clear and convincing justification for the harm has been given.
- 13.5. When assessed against the policies of the NPPF taken as a whole, the application is broadly supported by the NPPF by offering significant economic and social public benefits, with good environmental credentials in relation to a proposal of this nature. The proposal does however conflict with paragraph 174 of the NPPF in regard to landscape harms.

- 13.6. In forming an overall balance, the proposal does not comply with the development plan as a whole with regard to the significant landscape harm and approval of the application would strictly represent a departure from the plan. However, officers are satisfied that the proposal is a unique and exceptional circumstance in which material considerations, notably the support offered by the NPPF and public benefits, indicate that in this instance a decision should be taken that departs from the plan as the benefits significantly and demonstrably outweigh the harms (landscape and heritage). The recommendation is therefore the grant planning permission.
- 13.7. In conclusion this proposal for full planning permission for the part change of use of land for the erection of a construction/ training facility, associated storage and landscaping and part change of use of land for the grazing of horses and sheep with associated stables and storage, is considered to be a development that has been sufficiently justified in this location and would offer significant public benefits, which reflects the overall strategy of Mid Suffolk's Development Plan. The application accords with the development plan as a whole and permission should be granted.

## **RECOMMENDATION**

- 1) That Members resolve to: Delegate Authority to the Chief Planning Officer to GRANT planning permission, including the imposition of relevant conditions and informatives as summarised below and those as may be deemed necessary by the Chief Planning Officer:

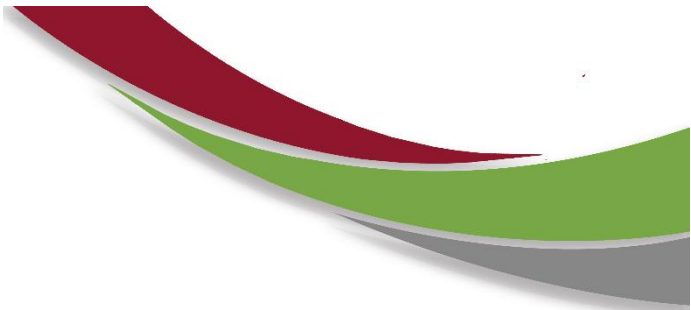
### Conditions

- Standard 3-year time limit
- Approved plans
- Sustainability measures (broadly in accordance with the proposed measures submitted under the application- including EV charging points and PV panels) to be submitted
- Construction Environmental Management Plan to be submitted
- Biodiversity Enhancement Strategy to be submitted
- Wildlife Sensitive Lighting Scheme to be submitted
- Fire hydrants to be submitted
- Archaeological Written Scheme of Investigation to be submitted
- Archaeological Post Investigation to be submitted
- Surface Water Drainage and Flood Risk Assessment Strategy implemented
- Surface Water Drainage Verification Report to be submitted
- Construction Surface Water Management Plan to be submitted
- Visibility splays to be provided in full and no obstruction to be within those splays.
- Parking provision provided in full
- Details of means to prevent surface water entering highway to be submitted
- Bin storage and presentation areas to be submitted
- Construction Management Plan to be submitted
- Access upgrades to be implemented
- Temporary cabins to removed from site 1 year after commencement
- Travel Plan to be submitted

- Notwithstanding the provisions of F1 use class, the building shall be exclusively for delivery of construction and agricultural training
- Container storage shall solely be used for incidental purposes to the construction and agricultural training
- Arboricultural report to be adhered to
- Materials details of all buildings (including colours) to be submitted
- Soft landscaping plan to be implemented
- Notwithstanding soft landscaping further landscaping details of SuDS to be submitted
- Notwithstanding soft landscaping plan, additional information on root barrier membranes to be submitted
- Landscape Management Plan to be implemented
- Hard Landscaping details to be submitted
- Equestrian land used for private use- no commercial equestrian use permitted
- Site Management Plan to be submitted
- Independent noise assessment to be carried out prior to first use
- Construction and agricultural activities shall be confined to the dedicated areas on site plan

#### Informatives

- Positive working with NPPF- pre-app
- National Highways recommended notes
- SCC Highways recommended notes
- SCC Public Rights of Way recommended notes
- SCC Floods and Water recommended notes
- Environment Agency recommended notes
- East Suffolk Drainage Board recommended notes



Application No: DC/21/05596

Location: Land at Pipp's Ford, A14 Slip Off to A140, Coddendam

Page No.

Appendix 1: Call In Request	Yes	
Appendix 2: Details of Previous Decision	No	
Appendix 3: Town/Parish Council/s	<b>Coddendam Parish Council</b> <b>Needham Market Town Council</b>	
Appendix 4: National Consultee Responses	<b>East Suffolk Drainage Board</b> <b>Environment Agency</b> <b>National Highways</b> <b>Natural England</b>	
Appendix 5: County Council Responses	<b>Archaeology</b> <b>Highways</b> <b>Fire and Rescue</b> <b>Floods and Water</b> <b>Minerals and Waste</b> <b>Public Rights of Way</b> <b>Travel Plan</b>	
Appendix 6: Internal Consultee Responses	<b>Arboricultural Officer</b>	



Babergh and Mid Suffolk District Councils



	<b>Economic Development</b> <b>Environmental Health (Air Quality)</b> <b>Environmental Health (Noise, Odour, Light and Smoke)</b> <b>Environmental Health- (Land Contamination)</b> <b>Environmental Health- (Sustainability)</b> <b>Heritage</b> <b>Ecology (Place Services)</b> <b>Landscaping (Place Services)</b> <b>Public Realm</b> <b>Waste Services</b>	
Appendix 7: Any other consultee responses	<b>Suffolk Preservation Society</b> <b>Stowmarket Ramblers</b>	
Appendix 8: Application Site Location Plan	Yes	
Appendix 9: Application Plans and Docs	Yes	
Appendix 10: Further information	N/a	

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




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Babergh and Mid Suffolk District Councils

# **Consultee Comments for Planning Application DC/21/05596**

## **Application Summary**

Application Number: DC/21/05596

Address: Land At Pippes Ford A14 Slip Off To A140 Coddenham Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## **Consultee Details**

Name: Mrs Sue Frankis

Address: 24 Church Crescent, Sproughton, Ipswich, Suffolk IP8 3BJ

Email: Not Available

On Behalf Of: Coddenham Parish Clerk

## **Comments**

At a meeting of Coddenham Parish Council, held on 17 March 2022, the Council unanimously agreed to put forward a recommendation of OBJECTION to p.a. DC/21/05596, additional documents submitted, citing the reasons given in our original submission of OBJECTION.

# Consultee Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At Pippis Ford A14 Slip Off To A140 Coddendam Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## Consultee Details

Name: Mrs Sue Frankis

Address: 24 Church Crescent, Sproughton, Ipswich, Suffolk IP8 3BJ

Email: Not Available

On Behalf Of: Coddendam Parish Clerk

## Comments

Coddendam Parish Council has considered application DC/21/05596 and is unanimously unimpressed by the submission; the Council strongly recommend that it be REFUSED planning permission. This application does not contain any new details sufficient to overcome the Parish Council's previously strong objections of application DC/21/00487 or those raised in the Refusal Notice. It does instead appear to be complaining that the applicant wasn't given the opportunity to comment on responses received by MSDC during the consultation process of the previous application (they were of course available on the MSDC planning pages).

The Parish Council was relieved to receive notification that application DC/21/00487 was refused permission although we are surprised that the very obvious highway safety issues concerning the access were omitted.

Furthermore, the impact of a proposed screen fence of 'up to 2 metres in height' should be singled out for specific criticism as being totally unacceptable intrusion into the countryside and for what reason?

No doubt the sheep grazing element of the application will be deleted as such a use of land does not require specific planning permission as it is not 'development' as defined.

Coddendam Parish Council urges MSDC to REFUSE the application taking into account the above comments together with all of the written objections previously submitted.



# Consultee Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At Pippys Ford A14 Slip Off To A140 Coddendam Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Jasmine Whyard

## Consultee Details

Name: Mr Kevin Hunter

Address: Needham Market Community Centre, School Street, Needham Market Ipswich, Suffolk IP6 8BB

Email: Not Available

On Behalf Of: Needham Market Town Council

## Comments

Needham Market Town Council further reiterates its grounds of strong objection as it made in response to the original application, as follows: The proposed development site is situated in a relatively tranquil area beside the River Gipping. The River Gipping Walk is an important recreational facility both for the local community and beyond. It is a key factor in attracting visitors to the town which is critical to supporting the local economy. In that and many other respects the proposed use of the site is fundamentally unsuited to its location and there are numerous other commercial sites readily available to accommodate the proposed business use. The relevant land allocations are identified in the local Planning Authorities Core Strategy Focussed Review and the emerging Joint Local Plan. The purpose of those documents is primarily to direct future housing and employment growth to appropriate locations. The proposed business use will generate considerable pollution totally alien to its location and which will cause significant intrusion and irreparable damage to local biodiversity and, more generally the environment, the future of which is finely balanced. The proposals are also contrary to the development of Needham Market as set out in Needham Market Neighbourhood Plan.

# Consultee Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At Pippys Ford A14 Slip Off To A140 Coddham Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## Consultee Details

Name: Mr Kevin Hunter

Address: Needham Market Community Centre, School Street, Needham Market Ipswich, Suffolk IP6 8BB

Email: Not Available

On Behalf Of: Needham Market Town Council

## Comments

Needham Market Town Council reiterates its grounds of strong objection as it made in response to the original application, as follows: The proposed development site is situated in a relatively tranquil area beside the River Gipping. The River Gipping Walk is an important recreational facility both for the local community and beyond. It is a key factor in attracting visitors to the town which is critical to supporting the local economy. In that and many other respects the proposed use of the site is fundamentally unsuited to its location and there are numerous other commercial sites readily available to accommodate the proposed business use. The relevant land allocations are identified in the local Planning Authorities Core Strategy Focussed Review and the emerging Joint Local Plan. The purpose of those documents is primarily to direct future housing and employment growth to appropriate locations. The proposed business use will generate considerable pollution totally alien to its location and which will cause significant intrusion and irreparable damage to local biodiversity and, more generally the environment, the future of which is finely balanced. The proposals are also contrary to the development of Needham Market as set out in Needham Market Neighbourhood Plan.

# Consultee Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At PIPPS Ford A14 Slip Off To A140 Coddham Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## Consultee Details

Name: Mr Kevin Hunter

Address: Needham Market Community Centre, School Street, Needham Market Ipswich, Suffolk IP6 8BB

Email: Not Available

On Behalf Of: Needham Market Town Council

## Comments

Needham Market Town Council finds the application has no more distinction nor merit than its predecessor DC/21/00487 and therefore reiterates its grounds of strong objection, as follows:

The proposed development site is situated in a relatively tranquil area beside the River Gipping. The River Gipping Walk is an important recreational facility both for the local community and beyond. It is a key factor in attracting visitors to the town which is critical to supporting the local economy. In that and many other respects the proposed use of the site is fundamentally unsuited to its location and there are numerous other commercial sites readily available to accommodate the proposed business use. The relevant land allocations are identified in the local Planning Authority's Core Strategy Focussed Review and the emerging Joint Local Plan. The purpose of those documents is primarily to direct future housing and employment growth to appropriate locations.

The proposed business use will generate considerable pollution totally alien to its location and which will cause significant intrusion and irreparable damage to local biodiversity and, more generally the environment, the future of which is finely balanced.

The National Planning Policy Framework (in particular paragraphs 170, 175, 180 and 183) includes many provisions relating to acceptable use of land and conserving the environment which the proposed use is wholly contrary to.

# Consultee Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At Pippys Ford A14 Slip Off To A140 Coddendam Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## Consultee Details

Name: Mr Kevin Hunter

Address: Needham Market Community Centre, School Street, Needham Market Ipswich, Suffolk IP6 8BB

Email: Not Available

On Behalf Of: Needham Market Town Council

## Comments

The Town Council continues to strongly object to the proposed use of the land for the purposes set out in the planning application, which should be REFUSED.

The proposed development site is situated in a relatively tranquil area beside the River Gipping. The River Gipping Walk is an important recreational facility both for the local community and beyond. It is a key factor in attracting visitors to the town which is critical to supporting the local economy. In that and many other respects the proposed use of the site is fundamentally unsuited to its location and there are numerous other commercial sites readily available to accommodate the proposed business use. The relevant land allocations are identified in the local Planning Authoritys Core Strategy Focussed Review and the emerging Joint Local Plan. The purpose of those documents is primarily to direct future housing and employment growth to appropriate locations.

The proposed business use will generate considerable pollution totally alien to its location and which will cause significant intrusion and irreparable damage to local biodiversity and, more generally the environment, the future of which is finely balanced.

The National Planning Policy Framework (in particular paragraphs 170, 175, 180 and 183) includes many provisions relating to acceptable use of land and conserving the environment which the proposed use is wholly contrary to.

This latest planning application includes nothing that reasonably or reliably mitigates the principles of development nor the impacts on landscape, amenity and natural environmental settings, or the

impact of amenity noise, that justified the refusal of the previous planning application DC/21/00487. It should therefore be summarily refused for the same reasons.

Our Ref: 21\_05439\_P  
Your Ref: DC/21/05596

02 November 2021

Dear Sir/Madam

**RE: Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site at Land At Pipp's Ford A14 Slip Off To A140 Coddendam Suffolk IP6 8LJ**

The site is partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. A copy of the Board's Byelaws can be accessed on our website ([https://www.wlma.org.uk/uploads/ESIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf)), along with maps of the IDD ([https://www.wlma.org.uk/uploads/ESIDB\\_Index\\_plan.pdf](https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf)). These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB.

In order to avoid conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the following:

- I note that the applicant intends to implement a drainage strategy to manage surface water runoff based on a series of SuDS features, including the use of swales and an infiltration basin, as per the Flood Risk Assessment and Drainage Strategy (Ingent Consulting Engineers, 2021). We recommend that the proposed SuDS features are designed and maintained in line with the [Non-Statutory technical standards for sustainable drainage systems \(SuDS\)](#). I note that the drainage strategy intends to mimic the existing regime and may include an overflow discharge to the River Gipping. I recommend that the Environment Agency, as regulator of main rivers, is consulted prior to any discharge of surface water to the River Gipping.
- I note that the applicant has not indicated how treated foul water from their site will be disposed of, beyond the use of a package treatment plant. If the applicant wishes to discharge foul water to an ordinary watercourse this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). However, if the applicant intends to discharge treated



Jane Marson (Chairman) Michael Paul (Vice-Chairman)

Phil Camamile (Chief Executive)

Constituted by The East Suffolk Internal Drainage Board Order 2008  
Statutory Instrument 2008 No 750



foul water to the main river (River Gipping), the Board is not the relevant regulator and the Environment Agency should be consulted.

- I am not aware of any riparian owned/maintained watercourses within or adjacent to the site boundary. However, this should be confirmed by the applicant. If the proposals do involve the alteration of a watercourse, consent would be required under the Land Drainage Act 1991 (and Byelaw 4).

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

Kind Regards,

Will

William Chandler  
Sustainable Development Officer  
Water Management Alliance

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

**Our ref:** AE/2021/126601/01-L01  
**Your ref:** DC/21/05596  
**Date:** 29 November 2021

Dear Sir/Madam

**PLANNING APPLICATION. CHANGE OF USE OF PART OF LAND TO USE AS A CONSTRUCTION AND AGRICULTURAL TRAINING FACILITY INCLUDING NEW TRAINING CENTRE AND ASSOCIATED CAR PARK AND HARDSTAND, EQUIPMENT/MACHINERY STORE AND SCAFFOLD AREA. CHANGE OF USE OF REMAINDER OF LAND TO USE FOR THE GRAZING OF HORSES AND SHEEP INCLUDING NEW STABLES AND STORAGE SHED. ASSOCIATED FENCING AND LANDSCAPING AND ALTERATIONS TO EXISTING ACCESS TO SITE LAND AT PIPPS FORD A14 SLIP OFF TO A140 CODDENHAM SUFFOLK IP6 8LJ**

Thank you for consulting us on the above application, we have reviewed the documents as submitted and can confirm that we have no objection to the proposed development. We have provided information below in relation to Flood Risk Activity Permits for the applicant below.

### **Flood Risk Activity Permit**

The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. The Gipping, is designated a 'main river'.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

We trust the above is useful.

Yours faithfully



**Miss Natalie Kermath  
Planning Advisor**



## National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Martin Fellows (Regional Director)  
Operations Directorate  
East Region  
National Highways  
[PlanningEE@highwaysengland.co.uk](mailto:PlanningEE@highwaysengland.co.uk)

To: Babergh and Mid Suffolk District Councils

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@highwaysengland.co.uk](mailto:spatialplanning@highwaysengland.co.uk)

**Council's Reference:** DC/21/05596

**National Highways Ref:** 92915

**Location:** Land at Pippas Ford, A14 off Slip to A140, Coddendam, Suffolk, IP6 8LJ

**Proposal:** Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Referring to the consultation on a planning application dated 13 October 2021, referenced above, in the vicinity of the A14 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~


Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

<b>Signature:</b> 	<b>Date:</b> 25 February 2022
<b>Name:</b> Eric Cooper	<b>Position:</b> Spatial Planning Manager
<b>National Highways</b> Highways England   Woodlands   Manton Lane   Bedford   MK41 7LW	

## **Annex A National Highway's assessment of the proposed development**

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

This response represents our formal recommendations with regards to DC/21/05596 and has been prepared by Eric Cooper.

This proposed development application site is located to the southwest of the A14 Junction 51 Beacon Hill Interchange. The existing site access is via a local road off the circulatory carriageway of the junction, adjacent to the A14 northbound exit slip road. National Highways is responsible for the A14 and its slip roads, whilst the junction is the responsibility of the local highway authority.

Further to our response of 10 December 2021, National Highways has held discussions on the impact of the proposals on the operation of the junction to ensure that it can operate safely with the development in place. These discussions have now concluded, and I am pleased that subject to the following condition, National Highways offers no objection.

- Prior to coming into beneficial use, the works as detailed on drawing Titled: Access Proposals, Drawing Number: 2003-444/001G Revision G shall have been completed to the satisfaction of the planning authority in consultation with National Highways and Suffolk County Council

Reason: To ensure that the A14 trunk road continues to serve its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements for road safety

It is requested that the following informative is added to any planning consent:

### **Third Party Works (Section 278 Agreements)**

If as part of development proposals, there is a need to alter the trunk road network either to provide access on to it or to provide improvements to the road and its junctions, in order to mitigate the impact of the development, then the developer will need to enter in an arrangement with National Highways to procure and deliver these works.

This is undertaken by entering into a Section 278 Agreement of the Highways Act, 1980, as amended by section 23 of the New Roads and Street Works Act 1991, with Highways England.

The Agreement provides a financial mechanism for ensuring delivery of the mitigation works identified and determined as necessary for planning permission to be granted. This protects the Public owned Company against the risk of carrying out the works without adequate funds being in place.

Following granting of planning consent, the developer should contact the Highways England to discuss taking these matters forward. In the first instance they should contact: [operationseastthirdpartyschemes@highwaysengland.co.uk](mailto:operationseastthirdpartyschemes@highwaysengland.co.uk)

There are a number of key points that should be noted in the delivery of highway works:

- It will be necessary to underwrite the whole cost of the works required under the S278 Agreement. This will include:
  - The preparation of the cost estimate by our Service Provider

National Highways employs the Service Provider who provides day to day operational support to maintaining and operating the trunk road network. The Cost Estimate is the initial estimate of all the costs associated with implementing the scheme and provides the initial basis for entering into a S278

agreement. This can be split into two stages – Stage 1 design checking and Stage 2 supervision

- o Review of the design of proposed works agreed at the planning stage.

Sometimes there is a significant delay between agreeing highway measures at the planning stage, receiving planning consent and implementation. The check is to ensure the proposed works are still appropriate in light of any changing circumstances.

- o Site supervision.

The cost of supervising any highway works to be undertaken. This is to ensure works are implemented in accordance with current standards and in a safe and appropriate manner

- o Temporary Traffic Management (if required)

Temporary Traffic Management is a system of road traffic signs, placement of traffic cones required to ensure that road works can be carried out safely whilst still allowing traffic to proceed in a safe manner.

- o Scheme works

The costs of the works

- o Road safety audits (RSAs)

There are four different stages of Road Safety Audits depending on the stage of implementation of the works. The audits ensure that the highway design is safe to use. RSA Stage 1 is an initial safety audit check undertaken as part of the planning application process. RSA Stage 2 is normally carried out prior to works on site commencing and Stage 3 is normally carried out once the works are complete. RSA Stage 4A & B is a check of the operation of the scheme once the works have been completed and are open to traffic. Usually Stage 4A 18 months and Stage 4B 42months after works completed.

- o Highway England's administration fee

This sum covers all the administrative costs associated with processing and progressing the S278 works through to completion

- o Maintenance commuted lump sum payment (CLS) (if required)

This sum covers the maintenance to be undertaken by Highways England relating to elements of the proposed highway scheme and is calculated on the basis of a 60 years evaluation period in accordance with Her Majesty's Treasury guidelines.

- Land Compensation Act 1973, Part 1 Claims (if required)

There is the potential for claims by adjoining property and/or land owners affected by the highway works under the Land Compensation Act 1973. This applies to individual property owners who consider they may have a right to compensation where the value of an interest in land is depreciated by physical factors caused by the highway works, such as an increase in traffic noise due to re-alignment of the carriageway and the provision of artificial lighting or traffic signals.

- It should be noted that before any works can take place, the S278 Agreement will need to be signed and all the estimated costs, including administrative costs and Agents fees, will have to be paid prior to the commencement of the highways works. National Highways is not allowed under statute to bear any cost associated with the drawing up of the Agreement, or related design and construction costs.

It is likely that any work on National Highway's Network will have to be carried out at night, we will do all we can to coordinate roadworks to reduce impact both on road users and to reduce costs

### **Further Information regarding S278 Agreements**

This is an initial guidance on the need for a S278 agreement. Further information on S278s can be found by contacting National Highways using the contact details above.

Date: 28 March 2022  
Our ref: 386645  
Your ref: DC/21/05596



Mid Suffolk District Council

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Sir/Madam,

**Planning consultation:** COU of part of land for construction & agricultural training facility, new training centre, car park & hardstand, equipment/machinery store & scaffold area. COU of remaining land for grazing horses & sheep, new stables & storage shed, fencing, landscaping & alterations to existing access

**Location:** Land at Pipp's Ford A14 Slip Off to A140 Coddensham Suffolk IP6 8LJ

Thank you for your consultation on the above dated 11 March 2022 which was received by Natural England on 11 March 2022

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

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

##### **NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

Natural England's generic advice on other natural environment issues is set out at Annex A.

#### **Sites of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

#### **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](https://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](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Loz Burrige  
Consultations Team

## Annex A – Additional advice

Natural England offers the following additional advice:

### Landscape

Paragraph 174 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 to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

### Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### Protected Species

Natural England has produced [standing advice](#)<sup>1</sup> 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 Site of Special Scientific Interest or in exceptional circumstances.

### Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)<sup>2</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

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

<sup>2</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>



### **Ancient woodland, ancient and veteran trees**

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Environmental gains**

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 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.

Natural England's [Biodiversity Metric 3.0](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.0](#) and is designed for use where certain criteria are met. It is available as a beta test version.

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).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.0](#) and is available as a beta test version.

### **Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

**Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

**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](#).

Growth, Highways and Infrastructure  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Chief Planning Officer  
Planning Services  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

Enquiries to: Dr Hannah Cutler  
Direct Line: 01284 741229  
Email: [Hannah.Cutler@suffolk.gov.uk](mailto:Hannah.Cutler@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2021\_05596  
Date: 14/10/21

For the Attention of Elizabeth Thomas

Dear Mr Isbell

**Planning Application DC/21/05596 – Land Adjoining A14 Slip Off To A140, Coddendam Suffolk: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. The Gipping Valley is dense with archaeological remains of all periods and this site is close to known cropmarks and finds, including Mesolithic finds and the important Coddendam-Baylam Roman Site. (CDD 003, 006, 060, BRK 104, 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.

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 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

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

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

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment

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

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

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).*

**INFORMATIVE:**

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, 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,

Hannah Cutler

Archaeological Officer  
Conservation Team

Your Ref: DC/21/05596  
Our Ref: SCC/CON/0737/22  
Date: 7 March 2022  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto: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: Vincent Pearce - MSDC

Dear Vincent

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/05596**

**PROPOSAL:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**LOCATION:** Land At PIPPS FORD, A14 Slip Off To A140, CODDENHAM, SUFFOLK IP6 8LJ

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

It is noted that following the previously requested Road Safety Audit and subsequent access design revisions, National Highways have now accepted the proposal and recommended a planning condition related to the access and associated highway works. SCC as local Highway Authority also accept and require the inclusion of that condition along with those listed below:

**Recommended conditions in addition to the National Highways access condition:**

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 002A and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

Condition: The use shall not commence until the area(s) within the site shown on drawing no. 1820/20/01 Rev N for the purposes of loading, unloading, manoeuvring and parking of vehicles has / have been provided and thereafter the area(s) shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient areas for vehicles to be parked are provided in accordance with Suffolk Guidance for Parking 2019 where on-street parking and or loading, unloading and manoeuvring would be detrimental to the safe use of the highway.

Condition: Before the development is commenced details of the areas and infrastructure to be provided for 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: In accordance with the current Suffolk Guidance for Parking.

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 including any system to dispose of the water. 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.

Condition: Before the development is commenced details of the areas to be provided for the storage and presentation for collection/emptying of refuse and 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 space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

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

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) 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.

**Notes:**

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

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

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing. For further information please visit:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>"

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**  
Growth, Highways and Infrastructure

Your Ref: DC/21/05596  
Our Ref: SCC/CON/4728/21  
Date: 2 November 2021  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto: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: Elizabeth Thomas - MSDC

Dear Elizabeth

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/05596**

**PROPOSAL:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**LOCATION:** Land At Pipp's Ford, A14 Slip Off To A140, Coddanham, Suffolk IP6 8LJ

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

**Holding objection until the following comment has been addressed:**

Whilst the proposal is potentially acceptable to the Highway Authority, the amendment to the existing highway access point to accommodate increased traffic flows is located on a very highly trafficked roundabout with a significant number of recorded injury accidents. The access point is very close to the existing A14 off slip and would be subject to intensive increased use (as training courses start and finish) at certain times. Subsequently, a stage 1 Road Safety Audit should be carried on the proposed amendment to the access point (taking into account the increased use), the first 8 metres of which, is within the existing highway boundary.

**Other comments:**

It is unclear as to exactly where the speed survey was carried out - the location of the loops should be shared to enable an assessment of the visibility to be made, which at 4.5m set back, would be a departure from standards.

It is also unclear exactly how many attendees and staff will be on-site in total during maximum occupancy, to enable a robust assessment of the parking provision to be made. The parking for staff (5 spaces) appears very low, given that 3-5 admin staff and up to 10 instructors will be employed.



Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**  
Growth, Highways and Infrastructure

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/F216244  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 14/10/2021

Dear Sirs

**LAND AT PIPPS FORD, A14 SLIP OFF TO A140, CODDENHAM, IP6 8LJ**  
**Planning Application No: DC/21/05596**  
**A CONDITION IS REQUIRED FOR FIRE HYDRANTS**  
**(see our required conditions)**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

### **Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

### **Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

/continued

OFFICIAL

We also recommend 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.

**Sprinklers Advised**

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appointed Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: [benelvinplanning@gmail.com](mailto:benelvinplanning@gmail.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: Water Officer  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 14 October 2021

**Planning Ref: DC/21/05596**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING  
ADDRESS:  
DESCRIPTION:  
HYDRANTS REQUIRED**

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

**If the Fire Authority is not consulted at the planning stage, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.**

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Created: September 2015

Enquiries to: Fire Business Support Team  
Tel: 01473 260588  
Email: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)



Dear Sir/Madam

### **Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development**

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

#### **Dispelling the Myths of Automatic Fire Sprinklers**

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

#### **Promoting the Benefits of Automatic Fire Sprinklers**

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.

## OFFICIAL

- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

### **The Next Step**

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Chief Fire Officer

Suffolk Fire and Rescue Service

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

**Sent:** 02 Mar 2022 01:53:44

**To:**

**Cc:**

**Subject:** FW: 2022-03-01 JS reply Land At PIPPS Ford, A14 Slip Off To A140, Coddenham, IP6 8LJ Ref DC/21/05596

**Attachments:**

---

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

**Sent:** 01 March 2022 15:29

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

**Cc:** Vincent Pearce <Vincent.Pearce@baberghmidsuffolk.gov.uk>

**Subject:** 2022-03-01 JS reply Land At PIPPS Ford, A14 Slip Off To A140, Coddenham, IP6 8LJ Ref DC/21/05596

Dear Vincent Pearce,

Subject: Land At PIPPS Ford, A14 Slip Off To A140, Coddenham, IP6 8LJ - Ref DC/21/05596

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/05596.

The following submitted documents have been reviewed and we recommend **approval subject to conditions** at this time:

- Flood Risk Assessment and Drainage Strategy Ref 2003-444 Rev A (Nov 2021)
- Designers Open SuDS Risk Assessment Ref 2004-444 Rev A
- Proposed Site Layout Plan ref 1820/20/01 N
- Drainage Strategy Ref 2003-444-003 Rev B

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

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated Nov 2021, ref: 2003-444 Rev A) shall be implemented as approved in writing by the local planning authority (LPA). The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

2. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

3. 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 LPA. 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:

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 or groundwater*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-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 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

Kind Regards

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

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

**Sent:** 03 Feb 2022 11:05:41

**To:**

**Cc:**

**Subject:** FW: 2022-02-03 JS Reply Land at Pipp's Ford, A14 Slip Off To A140, Coddendam IP6 8LJ Ref DC/21/05596

**Attachments:**

---

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

**Sent:** 03 February 2022 07:38

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

**Cc:** Elizabeth Thomas <Elizabeth.Thomas@baberghmidsuffolk.gov.uk>

**Subject:** 2022-02-03 JS Reply Land at Pipp's Ford, A14 Slip Off To A140, Coddendam IP6 8LJ Ref DC/21/05596

Dear Elizabeth Thomas,

Subject: Land at Pipp's Ford, A14 Slip Off To A140, Coddendam IP6 8LJ Ref DC/21/05596

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/05596.

The following submitted documents have been reviewed and we recommend maintaining a **holding objection** at this time:

- Flood Risk Assessment and Drainage Strategy Ref 2003-444 Rev A (Nov 2021)
- Designers Open SuDS Risk Assessment Ref 2004-444
- Proposed Site Layout Plan ref 1820/20/01 N

A holding objection is necessary because some of the points from the LLFA's previous consultation reply have not been addressed fully.

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

The points below detail the action required to overcome our current objection:-

1. Update the proposed site layout plan to include the SuDS basin (*note this document is with in the FRA as well as a standalone document Ref 1820/20/01 L*)
2. Resubmit the landscaping plans so that they include the SuDs features and included a five (5) year establishment plan.

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highway & Infrastructure

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

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

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Sent:** 02 February 2022 09:49

**To:** GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

**Subject:** MSDC Planning Re-consultation Request - DC/21/05596 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/05596 - Land At Pipp's Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** Vanessa Pannell <Vanessa.Pannell@baberghmidsuffolk.gov.uk>

**Sent:** 18 Oct 2021 12:11:19

**To:**

**Cc:**

**Subject:** 2021-10-18 JS Reply Land At Pippes Ford, A14 Slip Off To A140, Coddendam IP6 8LJ Ref DC/21/05596

**Attachments:**

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

**Sent:** 18 October 2021 08:32

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

**Cc:** Elizabeth Thomas <Elizabeth.Thomas@baberghmidsuffolk.gov.uk>

**Subject:** 2021-10-18 JS Reply Land At Pippes Ford, A14 Slip Off To A140, Coddendam IP6 8LJ Ref DC/21/05596

Dear Elizabeth Thomas,

Subject: Land at Pippes Ford, A14 Slip Off To A140, Coddendam IP6 8LJ Ref DC/21/05596

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/05596.

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Flood Risk Assessment and Drainage Strategy Ref 2003-444

A holding objection is necessary because there is some errors/discrepancies between the submitted documents

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

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

1. Update the FRA as the location plan is different to the submitted location plan.
2. Update the FRA drainage strategy drawings so that they reflect the proposed development layout
3. Resubmit the landscaping plans so that they include the SuDs features and included a five (5) year establishment plan.
4. Submit a designer's risk assessment for all open SuDs features

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highway & Infrastructure

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

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

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

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Sent:** 13 October 2021 11:59

**To:** GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

**Subject:** MSDC Planning Consultation Request - DC/21/05596

Please find attached planning consultation request letter relating to planning application - DC/21/05596 - Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Kind Regards

Planning Support Team

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

For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

Your Ref: DC/21/05596  
Our Ref: SCC/CON/1313/22  
Date: 13 April 2022  
Enquiries to: [william.manning@suffolk.gov.uk](mailto:william.manning@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: Jasmine Whyard

Dear Jasmine Whyard

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

**PROPOSAL:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed.

Associated fencing and landscaping and alterations to existing access to site

**LOCATION:** Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

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

Thank you for consulting us on this application, which is located in a mineral's consultation area. As the proposal is of a size lower than the safeguarding thresholds of 5Ha set out in policy MP10 of the Suffolk Minerals and Waste local plan. We, therefore, have no comments to make on this application.

If you have any questions about my comments, please do not hesitate to get in touch.

Yours sincerely,

**Billy Manning**  
**Career Grade Planning Officer**  
Planning Section  
Growth, Highways & Infrastructure

**From:** David Falk <david.falk@suffolk.gov.uk>

**Sent:** 27 April 2022 10:41

**Subject:** RE: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*- Land At Pipp's Ford, A14 Slip Off To A140, Coddanham

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE - REVISED**

**REF: DC/21/05596**

Thank you for your consultation concerning the above application.

**Following further discussions we can remove our holding objection to this application on the following basis:**

- **Coddanham Public Footpath 27 is maintained on its legal definitive alignment.**
- **Coddanham Public Footpath 27 has a minimum width of 1.5m.**
- **No structures are installed without proper permissions being granted.**
- **Any hedgerow is planted on the paddock side of fencing.**
- **As per bullet 7. below, any hedgerow is planted a minimum of 2.0m from the edge of the PROW and any fencing a minimum of 0.5m from the edge of the PROW.**

**The following points must also all be taken into account:**

1. **PROW MUST remain open, unobstructed, and safe for the public to use at all times, including throughout any construction period.** If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed (please see points 4 and 5 below).
2. PROW are divided into the following **classifications**:
  - Public Footpath – only for use on foot or with a mobility vehicle
  - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
  - Restricted Byway – use as per a bridleway, and by a 'non-motorised vehicle', e.g. a horse and carriage
  - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

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

3. The applicant, and any future owners, residents etc, must have **private rights to take motorised vehicles over a PROW** other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

4. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
  - **To apply for permission to carry out work on a PROW**, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. PLEASE NOTE, that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
  - **To apply for permission for structures** such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
5. **To apply for permission for a PROW to be stopped up or diverted** within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> PLEASE NOTE, that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
6. Under Section 167 of the Highways Act 1980 any **structural retaining wall** within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
7. Any **hedges adjacent to PROW** must be planted a minimum of 2.0 metres from the edge of the path in order to allow for annual growth. The landowner is responsible for the maintenance of the hedge and hedges must not obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any **fencing** should be positioned a minimum of 0.5 metre from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.
8. **There may be a further requirement to enhance the PROW network relating to this development. If this is the case, a separate response will contain any further information.**

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



Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 11 Apr 2022 11:53:02

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*- Land At Pipp's Ford, A14 Slip Off To A140, Coddendam

**Attachments:** ufm33\_Standard\_Re-consultation\_Letter.pdf

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

**Sent:** 08 April 2022 16:24

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

**Cc:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>; Annette Robinson <Annette.Robinson@suffolk.gov.uk>; Debbie Adams <Debbie.Adams@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*- Land At Pipp's Ford, A14 Slip Off To A140, Coddendam

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/21/05596 – FUL: Reason(s) for re-consultation: Please see document submitted 11.03.22**

Thank you for your consultation concerning the above application.

As previously highlighted, the proposed site does a public right of way (PROW): Coddendam Public Footpath 27. The Definitive Map for Coddendam can be seen at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Coddendam.pdf>.

**We object to this proposal on the following grounds:**

- **Our previous response dated 25 February 2022 included the following:**
  - **The public right of way should be separated from the Equestrian Area with open style post and rail fencing. Please note, fencing must be a minimum of 0.5m from the edge of the public right of way, effectively making a path width of a minimum of 2.5m.**
- **In addition, our previous response dated 15<sup>th</sup> October 2021 included the following:**
  - **The granting of planning permission is separate to any consents that may be required in relation to PROW.**
  - **It does not give authorisation for structures such as gates to be erected on a PROW and nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team: contact [prow.east@suffolk.gov.uk](mailto:prow.east@suffolk.gov.uk).**
- **Of the documents submitted 11.03.22 is 'Drawing Details: Proposed Site Plan – Number: 1820/20/01'. This does not appear to reflect the above requests.**
- **Four gates are depicted along Coddendam Public Footpath 27 which we do not authorise.**
- **As above, Coddendam Public Footpath 27 should be fenced off entirely from the Equestrian Area.**
- **The hedges depicted alongside Coddendam Public Footpath 27 by the 'Grass training area' should be field side of a fence beside the PROW. In addition, hedges must be a minimum of 2m from the edge of the PROW effectively making a corridor of a minimum 5.5m width.**

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

Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council

Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 11 March 2022 15:11

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*- Land At Pippes Ford, A14 Slip Off To A140, Coddendam

Please find attached planning re-consultation request letter relating to planning application - DC/21/05596 - Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 25 Feb 2022 02:50:56

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*Land At PIPPS Ford, A14 Slip Off To A140, Coddenham

**Attachments:** ufm33\_Standard\_Re-consultation\_Letter.pdf

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

**Sent:** 25 February 2022 12:58

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

**Cc:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>; Debbie Adams <Debbie.Adams@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Steve Kerr <Steve.Kerr@suffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*Land At PIPPS Ford, A14 Slip Off To A140, Coddenham

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/21/05596**

Thank you for your consultation concerning the above application.

The per our previous response of 15 October 2021, the proposed site does contain a public right of way (PROW): Coddenham Public Footpath 27. The Definitive Map for Coddenham can be seen at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Coddenham.pdf>

**We accept this proposal subject to the following:**

- **A detailed plot of public rights of way should be requested by the Applicant to ensure Coddenham Public Footpath 27 is accurately plotted on all relevant plans. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.**
- **The public right of way should be separated from the Equestrian Area with open style post and rail fencing. Please note, fencing must be a minimum of 0.5m from the edge of the public right of way, effectively making a path width of a minimum of 2.5m.**

**Furthermore, we ask that the following is taken into account:**

1. **PROW MUST remain open, unobstructed, and safe for the public to use at all times, including throughout any construction period.** If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed (please see points 4 and 5 below).
2. PROW are divided into the following **classifications**:
  - Public Footpath – only for use on foot or with a mobility vehicle
  - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
  - Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage
  - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

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

3. The applicant, and any future owners, residents etc, must have **private rights to take motorised vehicles over a PROW** other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

4. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
  - **To apply for permission to carry out work on a PROW**, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. PLEASE NOTE, that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
  - **To apply for permission for structures** such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
5. **To apply for permission for a PROW to be stopped up or diverted** within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> PLEASE NOTE, that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
6. Under Section 167 of the Highways Act 1980 any **structural retaining wall** within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
7. Any **hedges adjacent to PROW** must be planted a minimum of 2.0 metres from the edge of the path in order to allow for annual growth. The landowner is responsible for the maintenance of the hedge and hedges must not obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any **fencing** should be positioned a minimum of 0.5 metre from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.
8. **There may be a further requirement to enhance the PROW network relating to this development. If this is the case, a separate response will contain any further information.**

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

Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council  
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

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

From: [planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk) <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>

Sent: 02 February 2022 09:50

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Re-consultation Request - DC/21/05596 - FUL \*Land At Pippes Ford, A14 Slip Off To A140, Coddendam

Please find attached planning re-consultation request letter relating to planning application - DC/21/05596 - Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Kind Regards

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 15 Oct 2021 03:35:45

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/05596 \*Land at Pipp's Ford, A14 Slip off to A140 Coddenham

**Attachments:** ufm30\_Standard\_Consultation.pdf

---

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

**Sent:** 15 October 2021 15:08

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

**Cc:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Debbie Adams <Debbie.Adams@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/05596 \*Land at Pipp's Ford, A14 Slip off to A140 Coddenham

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/21/05596**

Thank you for your consultation concerning the above application.

The proposed site does contain a public right of way (PROW): Coddenham Public Footpath 27, as identified in the Applicant's plans. The Definitive Map for Coddenham can be seen at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Coddenham.pdf>. A more detailed plot of public rights of way can be provided. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.

**We accept this proposal but ask that the following is taken into account with specific attention to the following (see bullet 3 below):**

- **The granting of planning permission is separate to any consents that may be required in relation to PROW.**
- **It does not give authorisation for structures such as gates to be erected on a PROW and nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team: contact [prow.east@suffolk.gov.uk](mailto:prow.east@suffolk.gov.uk).**
- **The Applicant may want to discuss the option of diverting Coddenham Public Footpath 27 around the site by contacting [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk).**

1. PROW are divided into the following classifications:

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

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

2. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

3. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW. It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of**



a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:

- To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
- To apply for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.

4. **To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible** to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
5. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
6. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.
7. **There may be a requirement to enhance the PROW network relating to this development. If this is the case, a separate response will contain any further information.**

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

Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council  
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 13 October 2021 11:59

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/21/05596 \*Land at Pippes Ford, A14 Slip off to A140 Coddendam

Please find attached planning consultation request letter relating to planning application - DC/21/05596 - Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

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

**Sent:** 11 Mar 2022 03:37:40

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Re-consultation Request - DC/21/05596 - FUL

**Attachments:**

---

**From:** Chris Ward <Chris.Ward@suffolk.gov.uk>

**Sent:** 11 March 2022 15:37

**To:** Vincent Pearce <Vincent.Pearce@baberghmidsuffolk.gov.uk>

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

**Subject:** RE: MSDC Planning Re-consultation Request - DC/21/05596 - FUL

Dear Vincent,

Thank you for notifying me about the re-consultation. On reviewing the documents submitted, I have no comment to make.

Kind regards

**Chris Ward**

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

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

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

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

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Sent:** 11 March 2022 15:10

**To:** Chris Ward

**Subject:** MSDC Planning Re-consultation Request - DC/21/05596 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/05596 - Land At Pippis Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** BMSDC Planning Area Team Pink <PlanningPink@babberghmidsuffolk.gov.uk>

**Sent:** 05 Oct 2022 11:33:01

**To:**

**Cc:**

**Subject:** FW: DC/21/05596 Land at Pipp's Ford

**Attachments:**

---

**From:** David Pizzey <[David.Pizzey@babberghmidsuffolk.gov.uk](mailto:David.Pizzey@babberghmidsuffolk.gov.uk)>

**Sent:** 05 October 2022 10:53

**To:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>

**Subject:** DC/21/05596 Land at Pipp's Ford

Hi Jasmine

I have no objection to this application subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report, an appropriate condition should be used for this purpose. Although a small number of trees are proposed for removal, they are of limited public amenity value and/or poor condition and are not of sufficient arboricultural or landscape importance to warrant being a constraint.

Please let me know if you require any further input.

Kind regards

**David Pizzey**

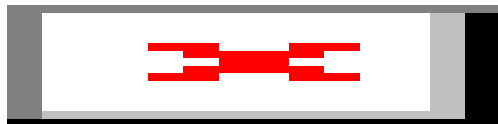
Arboricultural Officer

Tel: 01449 724555

[david.pizzey@babberghmidsuffolk.gov.uk](mailto:david.pizzey@babberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Babergh and Mid Suffolk District Councils – Working Together



---

**From:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>

**Sent:** 05 October 2022 09:42

**To:** David Pizzey <[David.Pizzey@babberghmidsuffolk.gov.uk](mailto:David.Pizzey@babberghmidsuffolk.gov.uk)>

**Subject:** DC/21/05596 Land at Pipp's Ford

Hi David,

We sent a consultation request to you for the above application which is due back on the 7<sup>th</sup> October. Is there any chance you would be able to get a response to me by tomorrow instead as I need to take the application to committee, and I have some tight timescales for getting it sorted? Thank you in advance!

Kind regards,

**Jasmine Whyard, BA (Hons), MSc**

Senior Planning Officer- Development Management

**Babergh and Mid Suffolk District Councils- Working Together**

Email: [jasmine.whyard@babberghmidsuffolk.gov.uk](mailto:jasmine.whyard@babberghmidsuffolk.gov.uk)

Tel: 01449724846 / 07547980983

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

**Sent:** 01 Apr 2022 10:16:19

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Re-consultation Request - DC/21/05596 - FUL

**Attachments:**

---

**From:** BMSDC Economic Development <BMSDCEconomicDevelopment@baberghmidsuffolk.gov.uk>

**Sent:** 31 March 2022 19:00

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

**Cc:** Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; Michelle Gordon <Michelle.Gordon@baberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Re-consultation Request - DC/21/05596 - FUL

Good Afternoon,

Thank you for this consultation.

Economic development support this application.

This application focuses on the development and provision of a new construction skills training facility, rather than provision of significant new employment, whilst commercial this use may not be best suited to an allocated employment site due to the outdoor nature of much of the training and delivery.

The construction industry is expected to experience and to support significant growth locally and nationally, with over £35bn of infrastructure projects anticipated for Norfolk and Suffolk over the next 15 years, this is growth is detailed in the Technical Skills legacy published by Suffolk Growth<sup>1</sup>. There were skills shortages already identified within the construction industry prior to additional pressures experienced following EU exit and recent pandemic, this application could be supportive in addressing these needs. I note that the applicant has included supporting statements that go some way to illustrating this.

The site itself is well connected to the highway network and within an easy distance of excellent public transport connections, enabling easy access of attendees. It's slight removal from the nearby settlement is helpful in reducing potential conflict with residential amenity.

<sup>1</sup> <https://www.suffolkgrowth.co.uk/technical-skills-legacy>

Kind Regards

Clare  
Sector and Skills – Economic Development and Regeneration team  
Babergh and Mid Suffolk District Councils – Working Together  
t: 01449 724880  
m: 07860827637  
e: [clare.free@baberghmidsuffolk.gov.uk](mailto:clare.free@baberghmidsuffolk.gov.uk)

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

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Sent:** 25 February 2022 11:32

**To:** BMSDC Economic Development <[BMSDCEconomicDevelopment@baberghmidsuffolk.gov.uk](mailto:BMSDCEconomicDevelopment@baberghmidsuffolk.gov.uk)>

**Subject:** MSDC Planning Re-consultation Request - DC/21/05596 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/05596 - Land At Pipp's Ford, A14 Slip Off To A140, Coddham, Suffolk IP6 8LJ

Kind Regards

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Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** BMSDC Planning Area Team Pink <PlanningPink@babermidsuffolk.gov.uk>

**Sent:** 21 Mar 2022 09:33:18

**To:**

**Cc:**

**Subject:** FW: DC/21/05596 - Air Quality

**Attachments:**

---

**From:** Jennifer Lockington <Jennifer.Lockington@babermidsuffolk.gov.uk>

**Sent:** 20 March 2022 22:04

**To:** Vincent Pearce <Vincent.Pearce@babermidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@babermidsuffolk.gov.uk>

**Cc:** BMSDC Planning Mailbox <planning@babermidsuffolk.gov.uk>

**Subject:** DC/21/05596 - Air Quality

Dear Vincent

YOUR REF: 21/05596

OUR REF: 304812

**SUBJECT:** Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ  
Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**Please find below my comments regarding air quality matters only.**

Thank you for your re-consultation on the above application.

The additional documents have no impact on air quality. Therefore, I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**

Senior Environmental Management Officer

**Babergh & Mid Suffolk District Councils - Working Together**

tel: 01449 724706

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Please note - I work Tuesdays and Wednesdays

---

**From:** Jennifer Lockington

**Sent:** 02 March 2022 22:10

**To:** Vincent Pearce <[Vincent.Pearce@babermidsuffolk.gov.uk](mailto:Vincent.Pearce@babermidsuffolk.gov.uk)>; BMSDC Planning Area Team Blue <[planningblue@babermidsuffolk.gov.uk](mailto:planningblue@babermidsuffolk.gov.uk)>

**Cc:** BMSDC Planning Mailbox <[planning@babermidsuffolk.gov.uk](mailto:planning@babermidsuffolk.gov.uk)>

**Subject:** DC/21/05596 - Air Quality

Dear Vincent

YOUR REF: 21/05596

OUR REF: 304082

**SUBJECT:** Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**Please find below my comments regarding air quality matters only.**

Thank you for your re-consultation on the above application.

The additional documents have no impact on air quality. Therefore, I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**

Senior Environmental Management Officer

**Babergh & Mid Suffolk District Councils - Working Together**

tel: 01449 724706

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Please note - I work Tuesdays and Wednesdays

---

**From:** Jennifer Lockington

**Sent:** 09 February 2022 14:24

**To:** Elizabeth Thomas <[Elizabeth.Thomas@babermidsuffolk.gov.uk](mailto:Elizabeth.Thomas@babermidsuffolk.gov.uk)>; BMSDC Planning Area Team Blue <[planningblue@babermidsuffolk.gov.uk](mailto:planningblue@babermidsuffolk.gov.uk)>

**Cc:** BMSDC Planning Mailbox <[planning@babermidsuffolk.gov.uk](mailto:planning@babermidsuffolk.gov.uk)>

**Subject:** DC/21/05596 - Air Quality

Dear Elizabeth

YOUR REF: 21/05596

OUR REF: 303106

**SUBJECT:** Land At Pippes Ford, A14 Slip Off To A140, Coddham, Suffolk IP6 8LJ

Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**Please find below my comments regarding air quality matters only.**

Thank you for your reconsultation on the above application. The additional documents do not affect my response.

I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**

Senior Environmental Management Officer

**Babergh & Mid Suffolk District Councils - Working Together**

tel: 01449 724706

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Please note - I work Tuesdays and Wednesdays

---

**From:** Jennifer Lockington

Page 139

**Sent:** 02 November 2021 15:22

**To:** Elizabeth Thomas <[Elizabeth.Thomas@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Thomas@baberghmidsuffolk.gov.uk)>; BMSDC Planning Area Team Blue <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>  
**Cc:** BMSDC Planning Mailbox <[planning@baberghmidsuffolk.gov.uk](mailto:planning@baberghmidsuffolk.gov.uk)>  
**Subject:** DC/21/05596 - Air Quality

Dear Elizabeth

YOUR REF: 21/05596

OUR REF: 299400

**SUBJECT:** Land At Pippes Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ  
Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**Please find below my comments regarding air quality matters only.**

Thank you for your consultation on the above application.

I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**  
Senior Environmental Management Officer  
**Babergh & Mid Suffolk District Councils - Working Together**  
tel: 01449 724706  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Please note - I work Tuesdays and Wednesdays



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

**Sent:** 02 Nov 2021 02:58:15

**To:**

**Cc:**

**Subject:** FW: DC/21/05596 re consultation

**Attachments:**

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**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>

**Sent:** 02 November 2021 14:54

**To:** Elizabeth Thomas <Elizabeth.Thomas@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

**Subject:** DC/21/05596 re consultation

Environmental Health -  
Noise/Odour/Light/Smoke

### **APPLICATION FOR PLANNING PERMISSION - DC/21/05596**

**Proposal:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

**Location:** Land At Pippys Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ

Thank you for reconsulting Environmental Protection on this application. I have reviewed the Noise and Vibration Impact Assessment, TECHNICAL REPORT, Ref:

35928-R2 dated: December 2020 and the subsequent addendum Ref:35928 dated: June 2021. Sound Solutions have considered all of the comments submitted by my colleague in relation to the plant, background noise levels. The background noise levels have been reviewed to take in to consideration Saturday noise levels due to the proposed hours of operation for the site.

Also considered are the mitigation from a bund and barrier around the site in relation to the topography of the site and surrounding noise sensitive premises. Noise from the types of plant proposed on site along with ATV's etc. likely to be used on site and the levels of operation have been reviewed.

I am satisfied that the addendum addresses the matters raised.

I have no objections to this proposal. However I would recommend that these are added as conditions to any permission granted based on the recommendations within the original noise report and the addendum submitted.

The consultants would like the scheme to be reconsidered following the addendum and its findings and are looking for support of the scheme based on the following methods of limiting the noise from the proposed activities on site Please control this by the following condition

- Prior to the use hereby permitted coming into beneficial use, a site management plan for on site activities shall be submitted and approved in writing by the LPA. The site management plan shall include methods to ensure the following are met:

- Maximum allowable power level sum for any plant in use  $\leq$  112 dB LWA.

- No more than six items of any plant in use at any one time.

- All plant to be throttled down to reflect training use and/or use low power modes.

- All plant to be shut down and not left idling when not in use.

- Exclusive use of white noise reversing alarms on all plant.
- Exclusive use of electric ATV and UTV vehicles.
- Correct placement, form and maintenance of a south west barrier of the developed site.

I would also ask that a further condition is added requiring independent testing prior to the site coming into beneficial use is added to demonstrate that the levels predicted are not exceeded.

- Prior to the use hereby permitted coming into beneficial use, A competent person shall ensure that the rating level of noise emitted from the site plant, equipment, machinery at the nearest noise sensitive premises identified in Sound Solutions TECHNICAL REPORT, Ref: 35928-R2 dated: December 2020, shall not exceed the predicted levels described within the subsequent addendum Ref:35928 dated: June 2021.

The assessment shall be made in accordance with the current version of British Standard 4142. The noise levels shall be determined at all boundaries near to noise-sensitive premises. Confirmation of the findings of the assessment shall be provided in writing to the local planning authority. Where further controls or mitigation are required to meet the predicted levels, a scheme of mitigation shall be submitted and demonstrated as sufficient and agreed in writing by the LPA prior to the use hereby permitted coming into beneficial use. All subsequent conditions shall comply with this standard.

- **Restriction of Location of Noisy Activities**

The construction and agricultural training facility activities hereby approved shall not be carried out anywhere on the site except within the buildings/area/indicated on the approved plans in order to comply with the initial noise condition.

*Andy*

**Andy Rutson-Edwards**, MCIEH AMIOA  
Senior Environmental Protection Officer  
**Babergh and Mid Suffolk District Council - Working Together**  
Tel: 01449 724727  
Email [andy.rutson-edwards@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>  
**Sent:** 22 Oct 2021 02:29:58  
**To:**  
**Cc:**  
**Subject:** FW: (299397) DC/21/05596. Land Contamination.  
**Attachments:**

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**From:** Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>  
**Sent:** 22 October 2021 13:51  
**To:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>  
**Cc:** Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>  
**Subject:** (299397) DC/21/05596. Land Contamination.

**EP Reference : 299397**  
**DC/21/05596. Land Contamination.**  
**Land at PIPPS FORD, A14 Slip Off To A140, CODDENHAM, IPSWICH, SUFFOLK.**  
**Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand,**

Many thanks for your request for comments in relation to the above application. I can confirm that I have no comments to make with respect to land contamination.

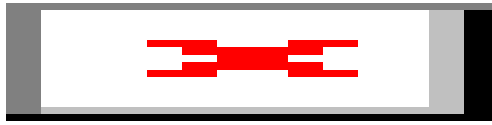
Kind regards

Nathan

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

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@babberghmidsuffolk.gov.uk](mailto:Nathan.pittam@babberghmidsuffolk.gov.uk)  
Work: 01449 724715  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 24 Feb 2022 10:50:56

**To:**

**Cc:**

**Subject:** FW: DC/21/05596

**Attachments:**

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**From:** Simon Davison <Simon.Davison@babberghmidsuffolk.gov.uk>

**Sent:** 23 February 2022 16:58

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

**Subject:** DC/21/05596

Dear Vincent,

### **APPLICATION FOR PLANNING PERMISSION - DC/21/05596**

**Proposal:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site.

**Location:** Land At Pipp's Ford, A14 Slip Off To A140, Coddham, Suffolk IP6 8LJ.

**Reason(s) for re-consultation:** Please see documents submitted 02.2.22

Many thanks for your request to comment on the application.

Upon review of the application the following condition must be met: No development shall commence above slab level until a scheme for the provision and implementation of water, energy and resource efficiency measures for the lifetime of the development shall be submitted to and approved, in writing, by the Local Planning Authority.

The scheme must include as a minimum to achieve:-

- Agreement of provisions to ensure the development is zero carbon ready
- An electric car charging point
- Agreement of heating for the office/conditioned areas
- Agreement of scheme for waste reduction
- Agreement of provisions to ensure no more than 105 litres per person per day is used

The scheme shall include a clear timetable for the implementation of the measures in relation to the first 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 and thereafter maintained.

**REASON:** To enhance the sustainability of the development through better use of water, energy and resources reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Kind regards

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

Mobile: 07874 634932

t: 01449 724728

email: [simon.davison@babberghmidsuffolk.gov.uk](mailto:simon.davison@babberghmidsuffolk.gov.uk)

w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

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

**Sent:** 01 Nov 2021 12:37:44

**To:**

**Cc:**

**Subject:** FW: DC/21/05596

**Attachments:**

---

**From:** Simon Davison <Simon.Davison@baberghmidsuffolk.gov.uk>

**Sent:** 01 November 2021 09:38

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

**Subject:** DC/21/05596

Dear Elizabeth,

#### **APPLICATION FOR PLANNING PERMISSION - DC/21/05596**

**Proposal:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site.

**Location:** Land At Pippys Ford, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ.

Many thanks for your request to comment on the application.

Upon review of the application the following condition must be met: No development shall commence above slab level until a scheme for the provision and implementation of water, energy and resource efficiency measures for the lifetime of the development shall be submitted to and approved, in writing, by the Local Planning Authority.

The scheme such include as a minimum to achieve:-

- Agreement of provisions to ensure no more than 105 litres per person per day is used
- Agreement of provisions to ensure the development is zero carbon ready
- Agreement of heating of each dwelling/building
- Agreement of scheme for waste reduction

It is recognised that the applicant wishes to install solar PV and battery storage to take the load off the diesel generator and this is to be encouraged. The Applicant suggests that they will meet the minimum requirements for insulation and will only exceed these if the budget allow. I would encourage the Applicant to work with the proposed insulation guidelines from the Future Homes Standard Consultation which would ensure a high-degree of insulation and minimise the on-going heating costs for the building, especially as the building will be electrically heated.

The scheme shall include a clear timetable for the implementation of the measures in relation to the first 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 and thereafter maintained.

**REASON:** To enhance the sustainability of the development through better use of water, energy and resources reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Kind regards

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

Mobile: 07874 634932

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email: [simon.davison@baberghmidsuffolk.gov.uk](mailto:simon.davison@baberghmidsuffolk.gov.uk)

w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/21/05596 Adj. A14 slip road to A140	
<b>2</b>	<b>Date of Response</b>	23.11.21	
<b>3</b>	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (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.	<ol style="list-style-type: none"> <li>1. I consider that the proposal would cause           <ul style="list-style-type: none"> <li>• less than substantial harm to a designated heritage asset because it would erode the rural character of the wider setting of a listed farmhouse.</li> <li>• the level of harm is rated very low.</li> </ul> </li> <li>2. The proposal would also cause a low level of harm to the significance of unlisted farm buildings at Pippes Ford.</li> <li>3. I recommend that these harms be weighed with any other harms and benefits in line with policy and the statutory duty relating to the setting of listed buildings.</li> </ol>	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The proposal is an amended version of the scheme refused under reference DC/21/00487. The principal revision is that the layout is adjusted so that one of the parking areas is moved to the eastern boundary. In terms of potential heritage impacts, my view is that the revision does not materially change the scheme's impact on heritage assets. The following comment is essentially repeated from the earlier application.</p> <p>The site lies adjacent to the slip road from the A14 westbound to the A140 roundabout, and slopes down generally to the west. Close to the south west corner of the site is a group of farm buildings converted to residential use. To their south west stands Pippes Ford, a listed farmhouse associated with the farm buildings. The farmhouse is somewhat secluded among trees, but more open towards to the farm buildings. As an open area of undeveloped land, the site makes a significant contribution to the setting of the historic farm buildings, and to the setting of the listed farmhouse itself. As buildings that historically had an intimate functional relationship with farmland around them, the open land contributes to appreciating their historic significance.</p> <p>To the north west of the site stands Pippins, listed at Grade II. Given the distance from the site, the closer position of the roundabout, and the line of tree growth to</p>	

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

		<p>the south, the site makes little contribution to the setting of this listed building.</p> <p>The proposal has two elements – a building and associated development providing training, and provisions for grazing for horses, with ancillary structures. The training building is towards the north east corner of the site, some 190m from the farm buildings, with grazing in the southern half. The building itself would be a rather functional structure with broad footprint and shallow roof pitch reaching 4.5m at the ridge. Similarly the scaffold tower and storage container would appear incongruous in the setting of historic buildings.</p> <p>Of more immediate concern would be panel fencing proposed at the boundary shared with the historic farm buildings, and close-boarded gates on the south boundary near the stable, which would adversely impact on the rural setting. There would also be panel fencing to the north east boundary, and close-boarded fence and gate to the entrance.</p> <p>In my view the proposal would have a low impact on the setting of Pippins, not resulting in harm to its significance. Impact on the setting of Pips Ford would also be low, resulting in harm at a very low level to the significance of the listed building. Impact on the setting of the farm buildings would be a little higher, with harm to their significance as undesignated assets at a low level.</p> <p>If the proposal receives a positive recommendation, it seems likely that my concerns on boundary treatments could be addressed through a landscaping scheme.</p>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<p><b>Recommended conditions</b></p>	

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





22 March 2022

Vincent Pearce  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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*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/21/05596  
**Location:** Land At Pipp's Ford A14 Slip Off To A140 Coddham Suffolk IP6 8LJ  
**Proposal:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed.

Dear Vincent,

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

**No objection subject to securing ecological mitigation and enhancement measures**

**Summary**

We have re-assessed the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021), relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats.

Furthermore, we have reviewed the additional information submitted with this application, including the Soft Landscaping Plans – Rev Po3 (wynne-williams associates Ltd, December 2021), the Landscape Management Plan (wynne-williams associates Ltd, December 2021).

In addition, we have reviewed the proposed site plan – Rev Q and the Existing And Proposed Site Sections A-A – Rev E (Medusa Design Ltd), submitted on the 11<sup>th</sup> March 2022.

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



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

The mitigation measures identified in Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021) should be secured and implemented in full. Therefore, a Construction Environmental Management Plan must be secured prior to commencement to avoid impacts upon the River Gipping and avoid impacts on Protected and Priority Species.

We also still recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

In addition, we support the proposed planting schedule and specification, as well as proposed aftercare measures for the soft landscaping features outlined within the submitted Landscape Management Plan. We are also pleased to see the measures proposed for the meadow mixtures.

However, we still recommend that bespoke ecological measures should be secured for this application, in line with the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021). This should be undertaken to secure net gains for biodiversity, as outlined under Paragraph 175d of the National Planning Policy Framework 2021. The finalised details for these measures should be secured as 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.

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. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY**



*“A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority, in line with the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021).*

*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.

## **2. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*“A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.”*

**Reason:** To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.



### **3. PRIOR TO BENEFICIARY USE: 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 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 conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson** ACIEEM BSc (Hons)  
Ecological Consultant  
[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

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

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



08 March 2022

Elizabeth Thomas  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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*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/21/05596  
**Location:** Land At Pippes Ford A14 Slip Off To A140 Coddensham Suffolk IP6 8LJ  
**Proposal:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed.

Dear Elizabeth,

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

**No objection subject to securing ecological mitigation and enhancement measures**

**Summary**

We have re-assessed the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021), relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats.

Furthermore, we have reviewed the additional information submitted with this application, including the Soft Landscaping Plans – Rev Po3 (wynne-williams associates Ltd, December 2021) and the Landscape Management Plan (wynne-williams associates Ltd, December 2021).

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

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



The mitigation measures identified in Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021) should be secured and implemented in full. Therefore, a Construction Environmental Management Plan must be secured prior to commencement to avoid impacts upon the River Gipping and avoid impacts on Protected and Priority Species.

We also still recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

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- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

In addition, we support the proposed planting schedule and specification, as well as proposed aftercare measures for the soft landscaping features outlined within the submitted Landscape Management Plan. We are also pleased to see the measures proposed for the meadow mixtures.

However, we still recommend that bespoke ecological measures should be secured for this application, in line with the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021). This should be undertaken to secure net gains for biodiversity, as outlined under Paragraph 175d of the National Planning Policy Framework 2021. The finalised details for these measures should be secured as 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.

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. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY**  
*"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority, in line with the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021).*



*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.

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- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.”*

**Reason:** To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.

## **3. PRIOR TO BENEFICIARY USE: 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 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 conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson** ACIEEM BSc (Hons)  
Ecological Consultant  
[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

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

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





12 November 2021

Elizabeth Thomas  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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*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.*

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**Application:** DC/21/05596  
**Location:** Land At Pipp's Ford A14 Slip Off To A140 Coddensham Suffolk IP6 8LJ  
**Proposal:** Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed.

Dear Elizabeth,

Thank you for consulting Place Services on the above application.

**No objection subject to securing ecological mitigation and enhancement measures**

**Summary**

We have reviewed the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021), relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats.

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

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

The mitigation measures identified in Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021) should be secured and implemented in full. Therefore, a Construction Environmental Management Plan must be secured prior to commencement to avoid impacts upon the River Gipping and avoid impacts on Protected and Priority Species.



We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

In addition, we support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d & 175d of the National Planning Policy Framework 2021. The finalised details for these measures should be secured as 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.

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. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY**

*"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority, in line with the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy Ltd, January 2021).*

*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*



- f) *Responsible persons and lines of communication.*
- g) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) *Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

## **2. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*“A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) *Purpose and conservation objectives for the proposed enhancement measures;*
- b) *detailed designs to achieve stated objectives;*
- c) *locations of proposed enhancement measures by appropriate maps and plans;*
- d) *persons responsible for implementing the enhancement measures;*
- e) *details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.”*

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

## **3. PRIOR TO BENEFICIARY USE: 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 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 conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), 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** ACIEEM BSc (Hons)  
Ecological Consultant  
[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

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

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



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

11/10/2022

For the attention of: Jasmine Whyard

**Ref: DC/21/05596 Land At PIPPS FORD, A14 Slip Off To A140, Coddendam, Suffolk IP6 8LJ**

Thank you for re-consulting us on the above-referenced planning application for the change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site.

This letter should be read alongside our original consultation response letter dated 05/05/2022 and subsequent reconsultation response letters dated 07/07/2022 and 02/08/2022. We have reviewed the following submitted document(s):

- 'Land at PIPPS FORD Landscape and Visual Appraisal' (Dated: June 2022)
- Proposed Site Plan (Dwg No. 1820/20/01 Rev. U)
- Landscape Sections (Dwg No. 2017-WWA-00-XX-DR-L-0400 Rev P01)
- Soft Landscaping Plan 1 (Dwg No. 2017-WWA-00-XX-DR-L-300 Rev. P03)
- Soft Landscaping Plan 2 (Dwg No. 2017-WWA-00-XX-DR-L-301 Rev. P05)
- Soft Landscaping Plan 3 (Dwg No. 2017-WWA-00-XX-DR-L-302 Rev. P04)
- Soft Landscaping Plan 4 (Dwg No. 2017-WWA-00-XX-DR-L-303 Rev. P01)
- PIPPS PARKS Outline Specification, Management & Maintenance Plan (Dated: September 2022) (Document Ref. 2017-WWA-XX-XX-L-0600 Rev. P05)
- Arboricultural Impact Assessment & Method Statement (Document Ref. CA22/013 Rev. 1)

**Site Context**

The application site comprises a broadly rectangular-shaped parcel to the south-west of the A14 and south / south-east of the River Gipping. The site also lies to north-east of Grade II Listed PIPPS FORD (formerly Pip's Farm) and the associated buildings (i.e., The Old Barn, Lower Barn, Oak Barn and The Stables). Despite the presence of the A14, the surrounding area is predominantly rural, with the site adjoining a network of agricultural land, woodland and woodland shaws, located approximately 2 km south-east of the town of Needham Market.

The northern / north-western boundaries of the site are defined by the River Gipping and intervening vegetation and trees. The eastern boundary of the site is defined by an macadam surfaced road and intervening conifer vegetation. The road can be accessed to the north from Beacon Hill Interchange. The southern boundary of the site is formed by an gravelled track road and intervening trees and scrub vegetation. A stable building exists to the south-east corner of the site. The south-western corner is formed by vegetation and fencing associated with the curtilage The Old Barn. The western boundary lies contiguous with an arable field separated by an existing timber post and rail fence. A Public Right



of Way (PRoW) footpath (Ref. E-197 027/0) extends through the site in a broadly north-west to south-east direction and connects to footpath (Ref. E-197 028/0) to the south.

### **National Planning Policy Framework**

The National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities & Local Government (MHCLG) and last updated in July 2021. The NPPF includes for the conservation and enhancement of the natural environment by protecting and enhancing “*valued landscapes*” and sites of biodiversity or geological value / soils. Recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and other ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

### **Local Planning Policy**

Needham Market is listed within Policy CS1: ‘Settlement Hierarchy’ of the Core Strategy DPD (2008) as a Key Service Centre, though the site itself falls outside of the settlement boundary and therefore within the ‘countryside’ as defined in the adopted Mid Suffolk Local Plan (MSLP) (1998). Therefore, the proposals are subject to Policy CS2: ‘Development in the Countryside and Countryside villages’ of the Core Strategy DPD which restricts development to defined categories, one of which is for agriculture and forestry.

The MSLP Proposals Maps also identify the site as a Special Landscape Area and the proposals must therefore have regard to Policy CL2 ‘Development within Special Landscape Areas’ of the MSLP which states that within Special Landscape Areas, development should be sensitively designed, with high standards of layout, materials and landscape, and particular care taken to safeguard landscape quality.

The proposals should comply with Policy CS5: ‘Mid Suffolk’s Environment’ of the Core Strategy DPD which states that “*the Council will protect and conserve landscape qualities taking into account the natural environment...*” and also sets out to protect the district’s “*most important components and to encourage development that is consistent with conserving its overall character*”. The proposed development should also be compliant with Policy GP1 ‘Design and Layout of Development’ of the MSLP which requires that proposals should maintain or enhance the character and appearance of their surroundings

### **Review of the submitted documents**

#### General

The application has been supported by a Landscape and Visual Appraisal (LVA) undertaken by Wynne-Williams Associates. It appears that the LVA has not been updated to reflect the latest amendments however, as previously noted the LVA has been generally carried out in accordance with the principles set out within the ‘Guidelines for Landscape and Visual Impact Assessment’ Third Edition (GLVIA3) prepared by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA). It is noted that LI Technical Guidance Note (TGN) ‘Assessing the Value of Landscapes Outside National Designations’ 02-21 also appears to have been referenced within the LVA (Para 5) which is welcomed. The inclusion of this guidance is appreciated as it builds on the details within GLVIA3 and introduces additional factors that should be considered as part of assessments and demonstrates the importance of the different factors used to determine landscape value.

The viewpoint photography looks generally to be in line with the LI’s Technical Guidance Note (TGN) 06/19: ‘Visual Representation of Development Proposals’. We note that Type 1 (Annotated Viewpoint Photographs) have been used however which is welcomed. As acknowledged in the LVA (Para 2), the site visit and photography used to inform the assessment were undertaken on the 26<sup>th</sup> May 2022 (late-Spring) during fuller leaf cover. Therefore, it is noted that visibility of the Site would be greater in the Winter (where deciduous trees have little leaf cover) than illustrated in some of the photography presented in LVA. Though winter views would have been appreciated for all fieldwork and photography, the judgements appear to have been reviewed on the basis that this constraint is considered which is welcomed.

The assessment includes a desktop study, a review of the landscape and visual baseline, an appraisal of landscape and visual effects and suggested mitigation proposals. The Site's characteristics are suitably described and the range of views that are available are appropriately summarized.

#### Review of landscape character

The LVA (Section 4) has identified the landscape baseline of the site as including the National Character Area (NCA) 86: South Suffolk and North Essex Clayland as defined by Natural England and the Suffolk Landscape Character Assessment (SLCA) which identifies the site as being located within Landscape Character Area (LCA) 15: Rolling Estate Farmlands. The Site and its surroundings are considered in several different landscape character assessments, which from our records, have all been referenced in the baseline review. That said, only the character of the site and its immediate surroundings has been assessed as a landscape receptor, whereas we would expect other landscape receptors, such as the landscape character areas included in the baseline review to also be included

Nevertheless, we do agree that though the site and the surrounding landscape is designated at the local level and in isolation, the site's landscape condition is considered 'ordinary' due to intrusive elements including infrastructure which means that the area has the ability to accommodate change (LVA Paras 5.1 & 6.1). We also agree that the overall importance of effect on the site as a landscape receptor would not be deemed significant and unlikely to be a determining issue.

#### Review of visual impact

Visual effects are a result of the sensitivity of visual receptors (people who will experience changes to existing views) to the proposed development and the magnitude of those changes. The appraisal has identified visual receptors within the Study Area that are likely to have visibility of the Proposed Development. These include [but are not limited to]: public footpath(s) 121\_26, 121\_27, 121\_28, 121\_31, 121\_33, 121\_34, 121\_43, 121\_102, 121\_105, the Gipping Valley River Path, National Cycle Network Route 51, the A14 slip roads, and representative views from the Grade II Listed Pipp's Ford and Grade I Listed Park and Gardens at Shrubland Hall.

On review, it has been judged that on completion of the development after 15 years, there would be some adverse visual effects but only in the immediate proximity of the site. For example, the appraisal has judged that the importance of effects after 15 years on the Gipping Valley River Path would be 'moderate adverse' given the change in character to an outlook that's suburban. Generally speaking, we agree with the methodology and support the majority of the visual effects judged. Where our judgements may differ, these are not deemed substantial and would not alter the overall stance on the proposed development.

#### Further Actions

Notwithstanding the matters raised above, if minded for approval, we would advise the following landscape matters and recommendations should be taken into consideration as part of the design development:

- We would also recommend that Urban Design Advice be sought with regards to the layout, form, scale, design, appearance, materials and detailing of the proposed training centre, telehandler tower, stables, containers and temporary buildings to ensure that the design of buildings responds to the character of the area and its sustainable aspirations are being achieved.
- An amended 'Outline Specification, Management & Maintenance Plan' has been provided which is appreciated. Generally, the report is considered too generalised, for example we would expect aims and objectives to be provided for the respective landscape features or components requiring different forms of maintenance. Where detailed appropriately, the Outline Specification, Management and Maintenance Plan should aim to encourage constructive conservation and where possible should aim to improve local habitats.



- A larger proportion of the northern, north-western and eastern boundaries of the site should be retained as woodland shaw / belt. We would also expect the planting of native tree species and the creation of an 'eco-tone' of native scrub / thicket and wildflower planting as a green buffer to form a stronger edge. Trees and woodlands are key components of green infrastructure and can help create resilient, sustainable places to live in. Management and creation of woodlands should be given further consideration as part of the development of the site.
- Trees and vegetation will be essential to help provide cooler spaces across the development through shading. The leaves and branches of trees and plants can help reduce the amount of solar radiation that penetrates through tree canopies, although the amount of sunlight transmitted varies depending on species. As such, careful consideration of tree species' projected height and canopy spread, tree and plant requirements, the types of leaves, berries and flowers it produces, and its siting will all be important factors in determining the design of cool spaces. We would advise that preference is given to native planting, though there may be situations where non-native species may provide similar climate benefits. We would recommend that trees are planted at regular intervals and / or with regular spacing to provide valuable form shading.
- One of the key characteristics noted within the LCA includes 'organic patterns of fields'. We would expect that hedgerows are naturalised to create more organic lines. This can be accomplished by providing scalloped edge and the provision of native thicket / scrub and wildflower planting. We would also expect a greater provision of tree lined boundaries, to further soften the built form of development in views and to provide additional biodiversity and green infrastructure enhancements.
- We would expect that the design development to be carried out in accordance with [inter alia] Secured by Design Commercial (2015).
- We would expect to see naturalistic enhancement of the Public Right of Way (Ref. E-197 027/0) that runs through the site. Careful consideration should be given to its location and setting to ensure that the development does not prejudice the PRoW and ensuring that it remains open, unobstructed and safe for the public to use at all times, including throughout the construction phases of development.
- No hard landscape plans have been provided. Please provide details of all external paved or otherwise hard surfaced / landscaped areas, including existing and finished levels shown as contours with cross-sections, plans and sections, build-up information, materials and construction measures to ensure the protection of retained trees, hedgerows, and vegetation.
- The proposed parking areas should be designed to provide safe and secure parking and access, whilst also providing suitable soft and hard landscaping to ensure the space is of high quality. It is advised that porous asphalt solutions should be explored where feasible. Details of demarcation of parking bays and / or pedestrian pathways has also not been provided and it is advised that passive and sensitive solutions for traffic management should be explored. Please provide hard landscaping details, including levels, details of demarcation and any typical build-up information where relevant.
- The proposed materials palette for structures / buildings, boundary treatments and surfaces of hard and soft landscaping should ensure that due regard is given to colour, texture and finish to mitigate any potential visual impact they may have on the surrounding landscape and is sympathetic to the surrounding settlement and read in context with their particular environment of the site.
- Details of root barrier systems have not been provided. It is advised that details of root barrier systems should be submitted for trees in proximity to hard surfaces / landscaped areas. Please provide further details of the proposed root barrier membranes for the trees along the road frontage to allow for successful establishment.
- It is noted that the SuDS basin to the north of the site would have little value other than visual



amenity. The aesthetic appeal of the SuDS features plays an important role in ensuring multifunctionality. Careful consideration should be given to the ground contouring, planting and inlet and outlet design to maximise the amenity value. A standard approach of precast concrete and galvanised handrail for inlets / outlets should be avoided. To improve biodiversity the attenuation area should be combined with a range of vegetation types such as wildflowers and other nectar rich plants, grasses of various heights, drought tolerant species as well as marginal aquatics and wet grassland. Trees and shrubs should be used on slopes and basin perimeters where appropriate.

- Forest Research (Forestry Commission) have been published research to help improve our understanding of how trees will respond to the many environmental factors associated with climate change. We would advise that the knowledge and outcomes of this research are embedded into the scheme to ensure that the scheme considers climate change adaptation from the onset. Further information regarding the regional changes in England in tree species suitability can be found online here: <https://www.forestresearch.gov.uk/research/climate-change-impacts/climate-change-impacts-and-adaptation-in-englands-woodlands/regional-changes-in-england-in-tree-species-suitability-resulting-from-climate-change/east-england/>
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, but in certain urban and residential situations, better results might be achieved by the use of naturalised trees and shrubs, which are not necessarily native but are the correct tree for site conditions and would add landscape and arboricultural value.
- Where amenity grassland (low biodiversity value) is to be proposed, this should be replaced where possible by features with high biodiversity value (e.g., amenity grassland with bulbs / naturalised grassland and flowering lawns).

In the event that approval of this application is forthcoming then the following conditions should also be considered:

**1. IMPLEMENTATION: SOFT LANDSCAPING.**

All planting comprised in the approved details of landscaping shall be carried out in the first planting season following the commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species (unless the Local Planning Authority gives written consent for any variation).

**2. PRIOR TO COMMENCEMENT OF DEVELOPMENT: HARD LANDSCAPING SCHEME.**

No development (including demolition, earthworks, or vegetation clearance) shall take place until details of a hard landscaping scheme, phased in relation to any phasing of the development for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas; hard surfacing materials; minor artefacts and structures (for example street furniture, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

**3. IMPLEMENTATION: LANDSCAPE MANAGEMENT PLAN**

The 'Pipps Parks Outline Specification, Management & Maintenance Plan' (Dated: September 2022) (Document Ref. 2017-WWA-XX-XX-L-0600 Rev. P05) including its long-term objectives,

management responsibilities and maintenance schedules and timetables shall be carried out in accordance with the approved details and timetable. The Outline Specification, Management & Maintenance Plan shall be maintained, adhered to, and updated every five years in writing with the Local Planning Authority (unless the Local Planning Authority gives written consent for any variation).

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

Kind regards,

Lewis Reynolds BA (Hons) PGCert MA  
Senior Landscape Consultant

**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

07/07/2022

For the attention of: Jasmine Whyard

**Ref: DC/21/05596 Land At Pipp's Ford, A14 Slip Off To A140, Coddham, Suffolk IP6 8LJ**

Thank you for re-consulting us on the above-referenced planning application for the change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site.

This letter should be read alongside our original consultation response letter dated 05/05/2022. We have reviewed the following submitted document(s):

- 'Land at Pipp's Ford Landscape and Visual Appraisal' (Dated: June 2022)

**Site Context**

The application site comprises a broadly rectangular-shaped parcel to the south-west of the A14 and south / south-east of the River Gipping. The site also lies to north-east of Grade II Listed Pipp's Ford (formerly Pip's Farm) and the associated buildings (i.e., The Old Barn, Lower Barn, Oak Barn and The Stables). Despite the presence of the A14, the surrounding area is predominantly rural, with the site adjoining a network of agricultural land, woodland and woodland shaws, located approximately 2 km south-east of the town of Needham Market.

The northern / north-western boundaries of the site are defined by the River Gipping and intervening vegetation and trees. The eastern boundary of the site is defined by an macadam surfaced road and intervening conifer vegetation. The road can be accessed to the north from Beacon Hill Interchange. The southern boundary of the site is formed by an gravelled track road and intervening trees and scrub vegetation. A stable building exists to the south-east corner of the site. The south-western corner is formed by vegetation and fencing associated with the curtilage The Old Barn. The western boundary lies contiguous with an arable field separated by an existing timber post and rail fence. A Public Right of Way (PRoW) footpath (Ref. E-197 027/0) extends through the site in a broadly north-west to south-east direction and connects to footpath (Ref. E-197 028/0) to the south.

**National Planning Policy Framework**

The National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities & Local Government (MHCLG) and last updated in July 2021. The NPPF includes for the conservation and enhancement of the natural environment by protecting and enhancing "valued landscapes" and sites of biodiversity or geological value / soils. Recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and other ecosystem services



including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

## Local Planning Policy

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The proposals should comply with Policy CS5: 'Mid Suffolk's Environment' of the Core Strategy DPD which states that *"the Council will protect and conserve landscape qualities taking into account the natural environment..."* and also sets out to protect the district's *"most important components and to encourage development that is consistent with conserving its overall character"*. The proposed development should also be compliant with Policy GP1 'Design and Layout of Development' of the MSLP which requires that proposals should maintain or enhance the character and appearance of their surroundings

## Review of the submitted documents

### General

The application has been supported by a Landscape and Visual Appraisal (LVA) undertaken by Wynne-Williams Associates. Generally, the LVA has been carried out in accordance with the principles set out within the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) prepared by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA). It is noted that LI Technical Guidance Note (TGN) 'Assessing the Value of Landscapes Outside National Designations' 02-21 also appears to have been referenced within the LVA (Para 5) which is welcomed. The inclusion of this guidance is appreciated as it builds on the details within GLVIA3 and introduces additional factors that should be considered as part of assessments and demonstrates the importance of the different factors used to determine landscape value.

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The assessment includes a desktop study, a review of the landscape and visual baseline, an appraisal of landscape and visual effects and suggested mitigation proposals. The Site's characteristics are suitably described and the range of views that are available are appropriately summarized.

### Review of landscape character

The LVA (Section 4) has identified the landscape baseline of the site as including the National Character Area (NCA) 86: South Suffolk and North Essex Clayland as defined by Natural England and the Suffolk Landscape Character Assessment (SLCA) which identifies the site as being located within Landscape Character Area (LCA) 15: Rolling Estate Farmlands. The Site and its surroundings are

considered in several different landscape character assessments, which from our records, have all been referenced in the baseline review. That said, only the character of the site and its immediate surroundings has been assessed as a landscape receptor, whereas we would expect other landscape receptors, such as the landscape character areas included in the baseline review to also be included

Nevertheless, we do agree that though the site and the surrounding landscape is designated at the local level and in isolation, the site's landscape condition is considered 'ordinary' due to intrusive elements including infrastructure which means that the area has the ability to accommodate change (LVA Paras 5.1 & 6.1). We also agree that the overall importance of effect on the site as a landscape receptor would not be deemed significant and unlikely to be a determining issue.

### Review of visual impact

Visual effects are a result of the sensitivity of visual receptors (people who will experience changes to existing views) to the proposed development and the magnitude of those changes. The appraisal has identified visual receptors within the Study Area that are likely to have visibility of the Proposed Development. These include [but are not limited to]: public footpath(s) 121\_26, 121\_27, 121\_28, 121\_31, 121\_33, 121\_34, 121\_43, 121\_102, 121\_105, the Gipping Valley River Path, National Cycle Network Route 51, the A14 slip roads, and representative views from the Grade II Listed Pipp's Ford and Grade I Listed Park and Gardens at Shrubland Hall.

On review, it has been judged that on completion of the development after 15 years, there would be some adverse visual effects but only in the immediate proximity of the site. For example, the appraisal has judged that the importance of effects after 15 years on the Gipping Valley River Path would be moderate adverse given the change in character to an outlook that's suburban. Generally speaking, we agree with the methodology and support the majority of the visual effects judged. Where judgements may differ, these are not deemed significant and would not alter the overall stance on the proposed development.

### Further Actions

Notwithstanding the matters raised above, if minded for approval, we would advise the following landscape matters and recommendations should be taken into consideration as part of the design development

A revised 'Proposed Site Plan' (Dwg No. 1820/20/01 Rev. R) has been submitted within the LVA for review. The plan provides an illustrative arrangement of the development. In our judgement the site has a number of landscape and visual constraints, these include but are not limited to:

- We would also recommend that Urban Design Advice be sought with regards to the layout, form, scale, design, appearance, materials and detailing of the proposed training centre, telehandler tower, stables, containers and temporary buildings to ensure that the design of buildings responds to the character of the area and its sustainable aspirations are being achieved.
- An Arboricultural Survey and Report has not been provided but would have been appreciated in order to give us a greater understanding of the impact on existing trees and hedgerows affected by the proposal. If an arboricultural assessment is to be undertaken, it should be in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and should provide details on trees and shrubs quality, those to be retained and / or removed, the impact on them and any constraints.
- Whilst it is noted that an 'Outline Specification, Management & Maintenance Plan' has been provided. The report is too generalised, for example the proposed bunding will require specific protocols for management to ensure successful plant establishment. Furthermore details of its build-up has not been provided and therefore it is unclear whether this soil will be sourced externally or from within the site itself. Management of grassland for the paddocks will require a different approach to that of the SuDS basin which has also not been included within the report. We would therefore require the submission of a Landscape Management Plan which

includes details of all long term design objectives, management responsibilities, maintenance schedules and periods for all soft landscaping.

- A larger proportion of the northern, north-western and eastern boundaries of the site should be retained as woodland shaw / belt. We would also expect the planting of native tree species and the creation of an 'eco-tone' of native scrub / thicket and wildflower planting as a green buffer to form a stronger edge. Trees and woodlands are key components of green infrastructure and can help create resilient, sustainable places to live in. Management and creation of woodlands should be given further consideration as part of the development of the site.
- One of the key characteristics noted within the LCA includes 'organic patterns of fields'. We would expect that hedgerows are naturalised to create more organic lines. This can be accomplished by providing scalloped edge and the provision of native thicket / scrub and wildflower planting. We would also expect a greater provision of tree lined boundaries, to further soften the built form of development in views and to provide additional biodiversity and green infrastructure enhancements.
- We would expect to see naturalistic enhancement of the Public Right of Way (Ref. E-197 027/0) that runs through the site. Careful consideration should be given to its location and setting to ensure that the development does not prejudice the PRoW and ensuring that it remains open, unobstructed and safe for the public to use at all times, including throughout the construction phases of development.
- No planting specification has been included on the Proposed Site Plan. It is advised that there is insufficient information provided and therefore is not acceptable. 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 / vole guards) and any management regimes (including watering schedules) to support establishment.
- The proposed parking areas should be designed to provide safe and secure parking and access, whilst also providing suitable soft and hard landscaping to ensure the space is of high quality. It is advised that porous asphalt solutions should be explored where feasible. Details of demarcation of parking bays and / or pedestrian pathways has also not been provided and it is advised that passive and sensitive solutions for traffic management should be explored. Please provide hard landscaping details, including levels, details of demarcation and any typical build-up information where relevant.
- Details of root barrier systems have not been provided. It is advised that details of root barrier systems should be submitted for trees in proximity to hard surfaces / landscaped areas. Please provide further details of the proposed root barrier membranes for the trees along the road frontage to allow for successful establishment.
- It is noted that the SuDS basin to the north of the site would have little value other than visual amenity. The aesthetic appeal of the SuDS features plays an important role in ensuring multifunctionality. Careful consideration should be given to the ground contouring, planting and inlet and outlet design to maximise the amenity value. A standard approach of precast concrete and galvanised handrail for inlets/outlets should be avoided. To improve biodiversity the attenuation area should be combined with a range of vegetation types such as wildflowers and other nectar rich plants, grasses of various heights, drought tolerant species as well as marginal aquatics and wet grassland. Trees and shrubs should be used on slopes and basin perimeters where appropriate.
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, but in certain urban and residential situations, better results might be achieved by the use of naturalised trees and shrubs, which are not necessarily native but are the correct tree for site conditions and would add landscape and arboricultural value.



- Where amenity grassland (low biodiversity value) is to be proposed, this should be replaced where possible by features with high biodiversity value (e.g., amenity grassland with bulbs / naturalised grassland and flowering lawns).

In the event that approval of this application is forthcoming then the following conditions should also be considered:

**1. PRIOR TO COMMENCEMENT OF DEVELOPMENT: SOFT LANDSCAPING SCHEME.**

No development (including demolition, earthworks, or vegetation clearance) shall take place until a scheme of soft landscaping for the site drawn to a scale of not less than 1:200 has been submitted to and approved in writing by the Local Planning Authority. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

**2. PRIOR TO COMMENCEMENT OF DEVELOPMENT: HARD LANDSCAPING SCHEME.**

No development (including demolition, earthworks, or vegetation clearance) shall take place until details of a hard landscaping scheme, phased in relation to any phasing of the development for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas; hard surfacing materials; minor artefacts and structures (for example furniture, play equipment, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

**3. PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN**

No development above ground level shall take place until a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules and periods for all soft landscape areas together with a timetable for the implementation of the landscape management plan, has been submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out in accordance with the approved details and timetable.

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

Kind regards,

Lewis Reynolds BA (Hons) PGCert PGDip  
Senior Landscape Consultant

**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

05/05/2022

For the attention of: Jasmine Whyard

**Ref: DC/21/05596 Land At Pipp's Ford, A14 Slip Off To A140, Coddham, Suffolk IP6 8LJ**

Thank you for consulting us on the Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site.

This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

From a landscape perspective, we have reviewed the following documents:

- 'Proposed Site Plan' (Dwg No. 1820/20/01 Rev Q);
- 'Existing and Proposed Site Sections A-A' (Dwg No. 1820/20/02 Rev E);
- 'Proposed Floors Plans & Elevations' (Dwg No. 1820/20/03 Rev E);
- 'Existing Site Plan and Location Plan' (Dwg No. 1820/20/04 Rev B);
- 'Existing and Proposed Site Sections B-B & Proposed Stable and Storage Floor Plans (Dwg No. 1820/20/05 Rev E);
- 'Soft Landscaping Plan 1' (Dwg No. 2017-WWA-00-XX-DR-L-300 Rev P02);
- 'Soft Landscaping Plan 2' (Dwg No. 2017-WWA-00-XX-DR-L-301 Rev P03);
- 'Soft Landscaping Plan 3' (Dwg No. 2017-WWA-00-XX-DR-L-302 Rev P03);
- 'Landscape Sections' (Dwg No. 2017-WWA-00-XX-DR-L-0400 Rev P01); and
- 'Pipp's Park Outline Specification, Management & Maintenance Plan' (Dated: December 2021)

## Site Context

The application site comprises a broadly rectangular-shaped parcel to the south-west of the A14 and south / south-east of the River Gipping. The site also lies to north-east of Grade II Listed Pipp's Ford (formerly Pip's Farm) and the associated buildings (i.e., The Old Barn, Lower Barn, Oak Barn and The Stables). Despite the presence of the A14, the surrounding area is predominantly rural, with the site adjoining a network of agricultural land, woodland and woodland shaws, located approximately 2 km south-east of the town of Needham Market.

The northern / north-western boundaries of the site are defined by the River Gipping and intervening vegetation and trees. The eastern boundary of the site is defined by an macadam surfaced road and intervening conifer vegetation. The road can be accessed to the north from Beacon Hill Interchange. The southern boundary of the site is formed by an gravelled track road and intervening trees and scrub vegetation. A stable building exists to the south-east corner of the site. The south-western corner is



formed by vegetation and fencing associated with the curtilage The Old Barn. The western boundary lies contiguous with an arable field separated by an existing timber post and rail fence. A Public Right of Way (PRoW) footpath (Ref. E-197 027/0) extends through the site in a broadly north-west to south-east direction and connects to footpath (Ref. E-197 028/0) to the south.

### **Local Planning Policy**

Needham Market is listed within Policy CS1: 'Settlement Hierarchy' of the Core Strategy DPD (2008) as a Key Service Centre, though the site itself falls outside of the settlement boundary and therefore within the 'countryside' as defined in the adopted Mid Suffolk Local Plan (MSLP) (1998). Therefore, the proposals are subject to Policy CS2: 'Development in the Countryside and Countryside villages' of the Core Strategy DPD which restricts development to defined categories, one of which is for agriculture and forestry.

The MSLP Proposals Maps also identify the site as a Special Landscape Area and the proposals must therefore have regard to Policy CL2 'Development within Special Landscape Areas' of the MSLP which states that within Special Landscape Areas, development should be sensitively designed, with high standards of layout, materials and landscape, and particular care taken to safeguard landscape quality.

The proposals should comply with Policy CS5: 'Mid Suffolk's Environment' of the Core Strategy DPD which states that *"the Council will protect and conserve landscape qualities taking into account the natural environment..."* and also sets out to protect the district's *"most important components and to encourage development that is consistent with conserving its overall character"*. The proposed development should also be compliant with Policy GP1 'Design and Layout of Development' of the MSLP which requires that proposals should maintain or enhance the character and appearance of their surroundings

### **Review of the submitted documents**

We do have reservations regarding the proposal and the likely impacts it would have on the local landscape. The importance of understanding the landscape character of all landscapes in England is recognised in the NPPF. Landscape character assessment is the process which can identify these intrinsic values and unique characteristics of the diverse landscapes in the UK. Natural England have produced a framework of 159 countrywide landscape profiles for England, resulting in the 'National Character Areas' (NCAs). Countryside Character Volume 6: East of England identifies the site as lying within NCA 86: South Suffolk and North Essex Clayland.

The key characteristics of the South Suffolk and North Essex Clayland include [but are not limited to]: an undulating chalky boulder clay plateau dissected by numerous river valleys, giving a gentle sloping topography in the lower, wider valleys and steeper slopes in the narrower upper parts; fragments of chalk soils with a calcareous character, which also influences the character of the semi-natural vegetation cover; watercourses wind slowly across flood plains, supporting wet, fen-type habitats and grazing marshes; lowland wood pasture and ancient woodlands and a rich diversity of flowering plants; large, often ancient hedgerows which link woods and copses, forming wooded skylines; the agricultural landscape is predominantly arable with a wooded appearance, with some pasture on the valley floors; field patterns are irregular despite rationalisation, with much ancient countryside surviving; dispersed settlement pattern of scattered farmsteads and small settlements around 'tyes' (commons) or strip greens; winding, narrow and sometimes sunken lanes are bounded by deep ditches, wide verges and strong hedgerows; and a strong network of public rights of way which provide access to the area's archetypal lowland English countryside.

The relevant Landscape Character Assessment (LCA) for the site includes the 'Suffolk Landscape Character Assessment' (SLCA) which identifies the application site as being located within the LCA 15: Rolling Estate Farmlands. The character area as described in the SLCA largely reflects the characteristics of the application site, which includes gently sloping valley sides and plateau fringes, generally deep loamy soils, organic pattern of fields modified by later realignment, important foci for early settlement, coverts and plantations with some ancient woodlands, landscape parks with a core woodland pasture.

The SLCA notes the landscape sensitivity and change of the sloping valley side landscape type found across Suffolk, which exhibits some local variation dependent on the characteristics of the adjoining landscape types. However, the unifying theme is a readily apparent landed estate character. Development management for the Rolling Estate Farmlands recognises that the visual impact of new vertical elements is increased by the landform. New buildings are likely to have a significant impact on both the character and visual amenity of the valley floor and valley side landscape types. The setting of specific features and elements within the landscape, such as small-scale enclosure patterns can also be significantly damaged.

The SLCA also notes that the proliferation of post and rail fencing and subdivision of land into small paddocks can have a significant negative landscape impact. Mitigation strategies in terms of design, layout and stocking rates should be employed where possible. The management guidelines for the Rolling Estate Farmlands which are considered of relevance also include: reinforcement of the historic pattern of sinuous field boundaries; recognise localised areas of late enclosure hedges when restoring and planting hedgerows; maintaining and increasing the stock of hedgerows; maintaining the area of woodland cover; and maintaining and restoring historic parklands and their features.

The site also lies within close proximity to LCA 26: Valley Meadowlands and therefore is considered of relevance owing to the potential indirect effects. The character of the Valley Meadowlands is described as a flat landscape of alluvium or peat on valley floors, grassland divided by a network of wet ditches, occasional carr woodland and plantations of poplar, occasional small reedbeds, unsettled, cattle grazed fields and a number of fields converted to arable production. The landscape sensitivity and change of the Valley Meadowlands is described as flat valley floor landscapes that are still largely dominated by grazing land, punctuated by small carr woodlands and willow plantations. There is an occasional scattering of farmsteads and other notable features, landscapes are mostly narrow and enclosed by the valley sides, but they can be profoundly affected by changes to the management of land and the construction buildings on the valley sides.

The development management for this area emphasises that the construction of new buildings on the valley sides, or changes of land use, can easily have an adverse affect on the setting of this landscape. If these changes are to be permitted, the highest standards of design and effective mitigation strategies should be applied to minimise the detrimental impact on both the visual amenity and landscape character of the valley floor. Construction of buildings that project above the skyline should be avoided, while repositioning the proposal or adding a planting scheme behind the building can be partially successful. The SLCA notes [among others] that development and land use change and the introduction of horse grazing are key forces for change with the Valley Meadowlands.

The planning application has not been supported by a Landscape and Visual Appraisal (LVA), though we have made the professional judgement, that given the exaggerated visual impact of the height of new buildings (i.e., timber training building, stables, storage shed) and structures (telehandler training tower, shipping container, temporary cabins) within the context of the gently sloping valley sides of the River Gipping and its plateau fringes, as well as the sub-division of the site to agricultural training facility and horsiculture would disrupt the organic pattern of the fields and pasture, the introduction of new car parking areas, access road, roller and scaffold areas, crushed concrete hardstand / surfacing, which also results in an increase of activity of HGVs, equipment and machinery, and other vehicles (i.e., visitors, deliveries / goods, employees, etc) within the area, and the culmination of artefacts associated with the proposed changes of use (e.g., generators, PV panels, bollards, fencing, lighting, man-made bunding, artificial SuDS basin, signage, manure storage, waste and general clutter, etc) all of which would develop over time, would have an adverse and eroding impact on the landscape character, qualities and visual resources of the area.

Overall, given our concerns regarding adverse impacts on landscape character and the site's rural countryside location as well as insufficient supporting information, we are of the judgement that the application does not comply with Policies CS1, CS2 and CS5 of the Core Strategy DPD and Policies CL2 and GP1 of the MSLP, and therefore at conflict with the NPPF. As such, we cannot be supportive of the application.

However, if minded for approval, we would advise the below recommendations are taken into consideration.

A 'Proposed Site Plan' (Dwg No. 1820/20/01 Rev Q) has been submitted for review. The plan provides an illustrative arrangement of the development. In our judgement the site has a number of landscape and visual constraints which should be addressed as part of the design development, these include but are not limited to:

- Given our concerns that the proposal will have an adverse impact on the landscape character, we would expect a Landscape and Visual Appraisal (LVA) that follows the principles set out in the third edition of 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3) to be submitted. Preferably all fieldwork should be carried out during the winter months to assess impact on worst case scenario. All visual representation in any submitted LVA should also be in line with 'The Visual Representation of Development Proposals Technical Guidance Note' (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.
- Whilst a 'Supporting Statement' has been provided, we would also expect a Design and Access Statement (DAS) to be provided which follows the guidelines set out by Ministry of Housing, Communities & Local Government (MHCLG) 'National Design Guide' and is informed by, and addresses, the 'ten characteristics of well-designed places', as such the design rationale has not adequately been explained or defined within the submitted application. We would also recommend that Urban Design Advice be sought with regards to the layout, form, scale, design, appearance, materials and detailing of the proposed training centre, telehandler tower, stables, containers and temporary buildings to ensure that the design of buildings responds to the character of the area and its sustainable aspirations are being achieved.
- An Arboricultural Survey and Report has not been provided but would have been appreciated in order to give us a greater understanding of the impact on existing trees and hedgerows affected by the proposal. If an arboricultural assessment is to be undertaken, it should be in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and should provide details on trees and shrubs quality, those to be retained and / or removed, the impact on them and any constraints.
- Whilst it is noted that an 'Outline Specification, Management & Maintenance Plan' has been provided. The report is too generalised, for example the proposed bunding will require specific protocols for management to ensure successful plant establishment. Furthermore details of its build-up has not been provided and therefore it is unclear whether this soil will be sourced externally or from within the site itself. Management of grassland for the paddocks will require a different approach to that of the SuDS basin which has also not been included within the report. We would therefore require the submission of a Landscape Management Plan which includes details of all long term design objectives, management responsibilities, maintenance schedules and periods for all soft landscaping.
- A larger proportion of the northern, north-western and eastern boundaries of the site should be retained as woodland shaw / belt. We would also expect the planting of native tree species and the creation of an 'eco-tone' of native scrub / thicket and wildflower planting as a green buffer to form a stronger edge. Trees and woodlands are key components of green infrastructure and can help create resilient, sustainable places to live in. Management and creation of woodlands should be given further consideration as part of the development of the site.
- One of the key characteristics noted within the LCA includes 'organic patterns of fields'. We would expect that hedgerows are naturalised to create more organic lines. This can be accomplished by providing scalloped edging and the provision of native thicket / scrub planting. We would also expect a greater provision of tree lined boundaries, to further soften the built form of development in views and to provide additional biodiversity and green infrastructure enhancements.

- We would expect to see naturalistic enhancement of the Public Right of Way (Ref. E-197 027/0) through the site. Careful consideration should be given to its location and setting to ensure that the development will be screened from the footpath.
- No planting specification has been included on the Proposed Site Plan. It is advised that there is insufficient information provided and therefore is not acceptable. 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 / vole guards) and any management regimes (including watering schedules) to support establishment.
- The proposed parking areas should be designed to provide safe and secure parking and access, whilst also providing suitable soft and hard landscaping to ensure the space is of high quality. It is advised that porous asphalt solutions should be explored where feasible. Details of demarcation of parking bays and / or pedestrian pathways has also not been provided and it is advised that passive and sensitive solutions for traffic management should be explored. Please provide hard landscaping details, including levels, details of demarcation and any typical build-up information where relevant.
- Details of root barrier systems have not been provided. It is advised that details of root barrier systems should be submitted for trees in proximity to hard surfaces / landscaped areas. Please provide further details of the proposed root barrier membranes for the trees along the road frontage to allow for successful establishment.
- It is noted that the SuDS basin to the north of the site would have little value other than visual amenity. The aesthetic appeal of the SuDS features plays an important role in ensuring multifunctionality. Careful consideration should be given to the ground contouring, planting and inlet and outlet design to maximise the amenity value. A standard approach of precast concrete and galvanised handrail for inlets/outlets should be avoided. To improve biodiversity the attenuation area should be combined with a range of vegetation types such as wildflowers and other nectar rich plants, grasses of various heights, drought tolerant species as well as marginal aquatics and wet grassland. Trees and shrubs should be used on slopes and basin perimeters where appropriate.
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, but in certain urban and residential situations, better results might be achieved by the use of naturalised trees and shrubs, which are not necessarily native but are the correct tree for site conditions and would add landscape and arboricultural value.
- Where amenity grassland (low biodiversity value) is to be proposed, this should be replaced where possible by features with high biodiversity value (e.g., amenity grassland with bulbs / naturalised grassland and flowering lawns).

In the event that approval of this application is forthcoming then the following conditions should also be considered:

**1. PRIOR TO COMMENCEMENT OF DEVELOPMENT: SITE DEVELOPMENT SCHEME.**

No development shall take place until a scheme, hereafter referred to as the Site Development Scheme, shall have been submitted to and approved in writing by the local planning authority. The Site Development Scheme shall include a timetable for its implementation and details of:

- a. The means of foul and surface water drainage of the site;
- b. The facilities for, and location of, the storage and collection of refuse and recycling;
- c. External lighting on the boundary of, and within the site;
- d. Detailed boundary treatment plan that clearly shows the position of new fencing / hedging in relation to existing and proposed planting;
- e. Measures for the protection of trees and hedges on the application site that are to be

- retained.
- f. The internal layout of the site (notwithstanding the 'Proposed Site Plan'), including details of the Public Right of Way, hardstanding / hard surfacing; access roads; parking areas; amenity grass; gates, fencing and other boundary treatments; vehicle turning space of sufficient size to accommodate waste / recycling vehicles, agricultural vehicles and that of emergency / fire services;
  - g. Details of tree, hedge and shrub planting, including details of species, plant sizes, proposed numbers, and densities.

The approved Site Development Scheme shall be carried out and completed in accordance with the approved timetable. Upon implementation of the approved Site Development Scheme, that scheme shall thereafter be retained.

**2. PRIOR TO COMMENCEMENT OF DEVELOPMENT: SOFT LANDSCAPING SCHEME.**

No development (including demolition, earthworks, or vegetation clearance) shall take place until a scheme of soft landscaping for the site drawn to a scale of not less than 1:200 has been submitted to and approved in writing by the Local Planning Authority. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

**3. PRIOR TO COMMENCEMENT OF DEVELOPMENT: HARD LANDSCAPING SCHEME.**

No development (including demolition, earthworks, or vegetation clearance) shall take place until details of a hard landscaping scheme, phased in relation to any phasing of the development for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas; hard surfacing materials; minor artefacts and structures (for example furniture, play equipment, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

**4. PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN**

No development above ground level shall take place until a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules and periods for all soft landscape areas together with a timetable for the implementation of the landscape management plan, has been submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out in accordance with the approved details and timetable.

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

Kind regards,

Lewis Reynolds BA (Hons) PGCert PGDip  
Senior Landscape Consultant

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

**Sent:** 30 Mar 2022 02:44:29

**To:**

**Cc:**

**Subject:** FW: DC/21/05596 - Consultation Response

**Attachments:**

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

**Sent:** 30 March 2022 14:27

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

**Subject:** RE: DC/21/05596 - Consultation Response

Good afternoon

As the site does not involve any public open space, we do not have any comments to make.

Regards

Nick Elliott

Public Realm Officer

Babergh and Mid Suffolk District Councils – Working Together


(M) 07860 829546

(T) 01473 296340

[www.babergh.gov.uk](http://www.babergh.gov.uk)

[www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/21/05596	
<b>2</b>	<b>Date of Response</b>	23/02/2022	
<b>3</b>	<b>Responding Officer</b>	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Ensure that the training facility is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around the site with ease.</p> <p>Attached is the latest waste guidance for new developments.</p>  <p>SWP Waste Guidance v.21.docx</p> <p>The road surface and construction must be suitable for a RCV to drive on. Waste collections would need to be made from the site and not at the end of the private road as this joins a major around about.</p> <p>Waste and recycling arising from the training facility will need to be collected as trade waste.</p>	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		

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.

7	<b>Recommended conditions</b>	Meet the conditions in the discussion.
---	-------------------------------	--

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



10 November 2021

Vincent Pearce  
Planning Officer  
Mid Suffolk District Council  
Endeavour House, 8 Russell Rd,  
Ipswich, IP1 2BX

Dear Mr Pearce,

**DC/21/05596 Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site. Land At Pippes Ford A14 Slip Off To A140 Coddenham Suffolk IP6 8LJ**

I am writing on behalf of the Suffolk Preservation Society (SPS) regarding the proposals at Pippes Ford having been contacted by concerned residents regarding the impacts of the scheme. SPS understands that an identical scheme (DC/21/00487) was refused earlier this year and that this application is to allow additional material to be considered.

We note that the previous reasons for refusal included the lack of justification for the principle of development and information on flooding, as well as the impact of the development on the landscape and the natural environment and residential amenity. We are also aware of serious concerns regarding traffic safety and PROW access. SPS would like to raise our concerns regarding the impact of the proposals on this special landscape.

### **Impact on the Gipping Valley landscape**

The site is located within remote and detached countryside with the River Gipping to the south/west. On visiting the site, it is notable that although the A14/ A140 intersection is close by, the serene, remote character of the area remains intact and it is arguably highly sensitive to further degradation. SPS therefore has serious concerns regarding the intrusion of the proposed major development into this tranquil area.

The topography of the site, which falls from east to west, will render the proposed industrial use of the site highly visible within the Gipping Valley landscape. The proposed use of fencing to screen some of the views into the site will have limited effect due to the slope of the site and will itself introduce an alien, highly inappropriate feature into this attractive area. The 30m X 20m training centre and associated parking is at the highest point of the site and the quantum of equipment to

be introduced on the site, including scaffold towers, large construction and farming vehicles as well as cranes, will entirely change the appearance of the site, to the detriment of the wider area.

SPS also has concerns regarding these impact on Pippis Ford, a grade II listed C16th farmhouse located to the south/east of the site including associated farm buildings, some of which are identified as non-designated heritage assets, directly adjacent to the boundary. Although close to a major highway, the setting of Pippis Ford retains a strong sense of remoteness and seclusion. The applicant identifies that the setting of Pippis Ford will be impacted by the proposals at a low level but relies entirely on the visual impact of the scheme in this assessment. SPS is concerned that an overreliance on simple intervisibility does not take into account the impact of introducing a distinctly industrial land use into the original rural setting of the heritage assets. Although partially screened, the buildings, equipment and additional noise, lighting and heavy vehicular movements will impact on how the heritage assets are experienced and requires further assessment.

In conclusion, whilst SPS is wholly supportive of economic development schemes which create varied local jobs, it remains that these proposals are inappropriate on this sensitive site. The decision notice for the previous application highlighted that the visual amenity of the River Gipping is of significance to public benefit. It goes on to conclude that *the application has failed to demonstrate how the proposal sensitively integrates with the character of this rural area and the prevailing landscape characteristics. Due to the sloped terrain this major proposal would be prominent and dominant especially with all the associated paraphernalia operation and use.* SPS does not consider that the applicant has now provided any amendments or justification to change this conclusion.

We therefore see no reason for the local authority to amend its decision based on the landscape harm that the development would bring to the wider area and urge that the scheme is again refused. We trust that you will find these comments helpful in the consideration of this application.

Yours sincerely,



**Bethany Philbidge**  
**BSc (Hons) MSc MRTPI**  
**Planning Officer**

Cc: Needham Market Town Council  
Coddensham Parish Council  
Babergh Mid Suffolk Heritage team  
Ward Councillor

# Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At PIPPS Ford A14 Slip Off To A140 Coddendam Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## Customer Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds, Suffolk IP30 9ET

## Comment Details

Commenter Type: Amenity Group

Stance: Customer objects to the Planning Application

Comment Reasons:

- Development too high
- Landscape Impact
- Overlooking

Comment: Further to Stowmarket Ramblers comments on 3rd November 2021 we would like to express our very real concerns that this application would have on the enjoyment of walking the Gipping Valley Path in this area. This path is one of Suffolk's premier routes and should be protected against intrusive developments. The plans shows a 9 metre high tower which will be easily seen from the Gipping Valley Path which is just the other side of the adjacent river.

Although the new plans display Coddendam Footpath No.27, it is shown crossing a training area, which it is not clear if machinery will have to negotiate across this path. The path also crosses an equestrian area which could bring walkers into contact with horses either loose or being schooled.

# Comments for Planning Application DC/21/05596

## Application Summary

Application Number: DC/21/05596

Address: Land At Pippes Ford A14 Slip Off To A140 Coddham Suffolk IP6 8LJ

Proposal: Planning Application. Change of use of part of land to use as a construction and agricultural training facility including new training centre and associated car park and hardstand, equipment/machinery store and scaffold area. Change of use of remainder of land to use for the grazing of horses and sheep including new stables and storage shed. Associated fencing and landscaping and alterations to existing access to site

Case Officer: Vincent Pearce

## Customer Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds, Suffolk IP30 9ET

## Comment Details

Commenter Type: Amenity Group

Stance: Customer objects to the Planning Application

Comment Reasons:

- Application is lacking information

Comment: The Footpath Committee of Stowmarket Ramblers have viewed this application and can find no reference to Public Footpath No. 27 and to how this path is accommodated within these proposals.

If the route of this path is to be altered it must be via a Definitive Map Modification Order (DMMO) and put in place before any construction starts. A permissive path will not be acceptable.

## MEMBER REFERRAL TO COMMITTEE

(Completed form to be sent to Case Officer and Chief Planning Officer – Sustainable Communities)

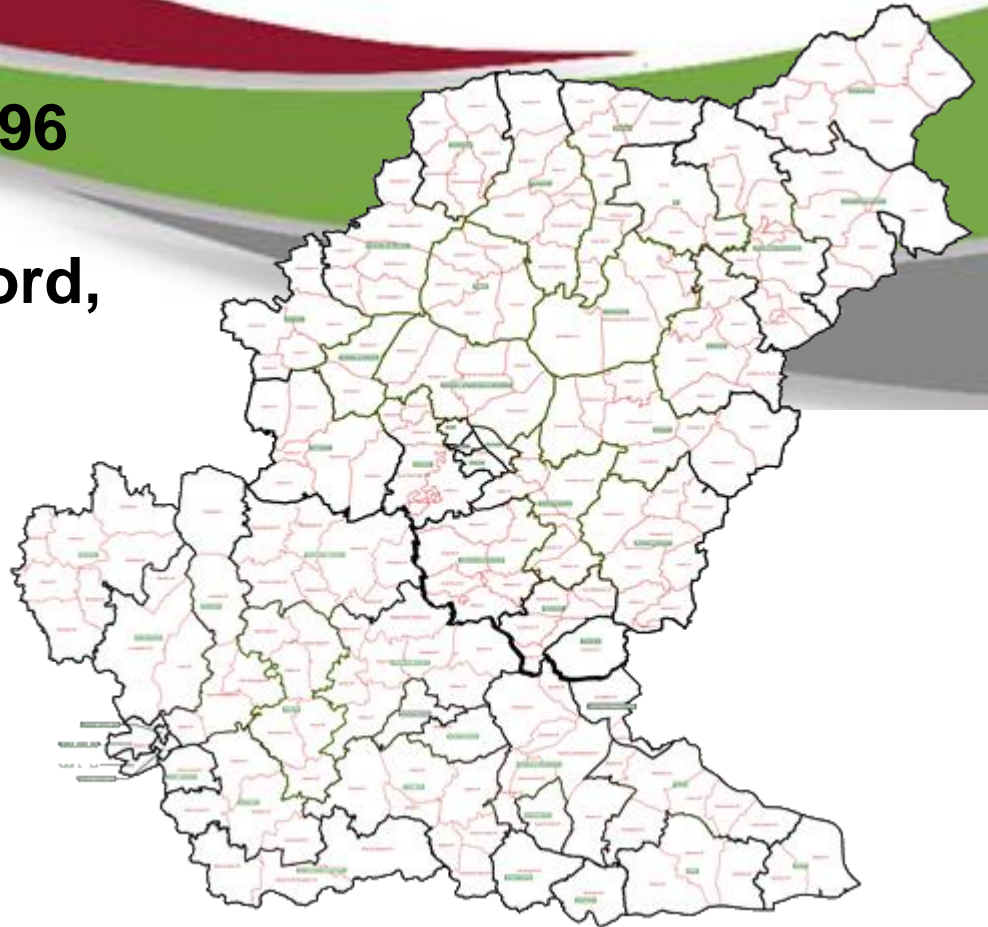
Planning application reference	21/05596 (previously 21/00487)
Parish	Coddenham
Member making request	John Whitehead & Tim Passmore
Please describe the significant policy, consistency or material considerations which make a decision on the application of more than local significance	Views along the River Gipping footpath are valued beyond the parish. Public right of way across the application site has been disregarded It is in a Special Landscape Area Concern expressed by adjacent parish (Needham Mkt)
Please detail the clear and substantial planning reasons for requesting a referral	Inappropriate and unsustainable commercial development in an open rural area. Poorly designed characterless development in an SLA Personal privacy issues – 12m high Plus noise aspects
Please detail the wider District and public interest in the application	Special Landscape Area Visible from River Gipping riverbank footpath Public right of way over the land
If the application is not in your Ward please describe the very significant impacts upon your Ward which might arise from the development	N/A
Please confirm what steps you have taken to discuss a referral to committee with the case officer	Various e-mails exchanged and then telephone conversation over Teams to discuss concerns  This form submitted by e-mail on 8th November 2021 – day 27 after validation to meet deadline.

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**Application No: DC/21/05596**

**Address: Land At Pipp's Ford,  
A14 Slip Off To A140,  
Coddanham**

Page  
87







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## Aerial Map – wider view

Slide 3



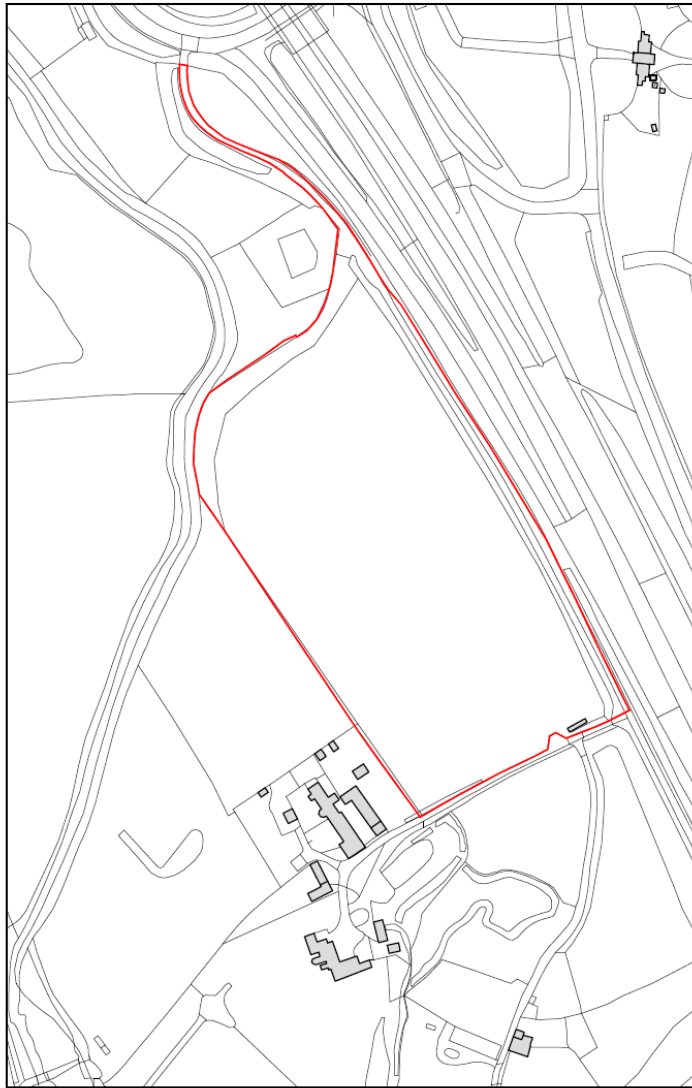
Page 189

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# Site Location Plan

Slide 4





# Constraints Map

..... Footpath

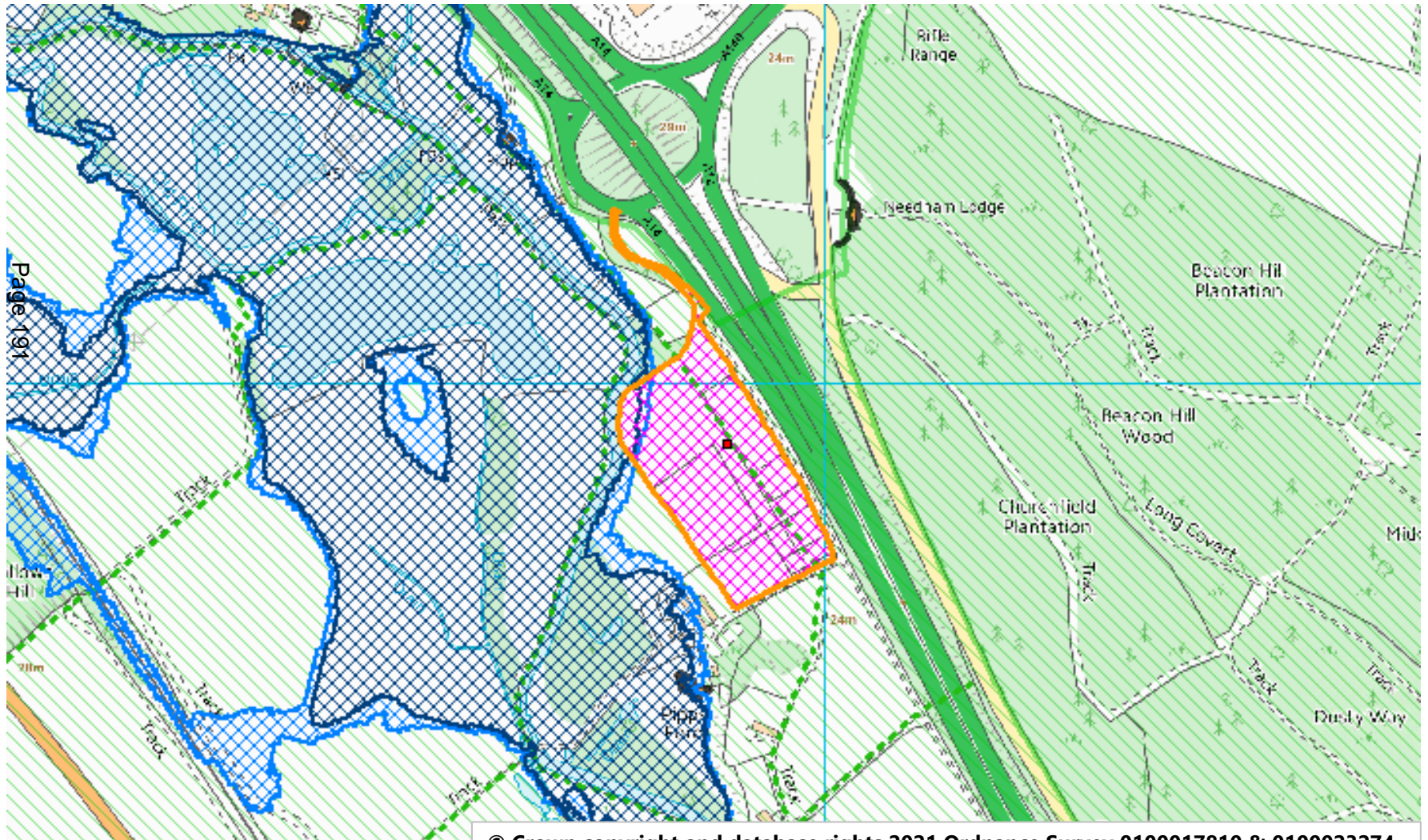
Special Landscape Area

Flood Zone 2

Flood Zone 3

Listed Buildings

Grade II



# Proposed Site Plan



Rev. 02 16.08.2022 - Drawing Complete

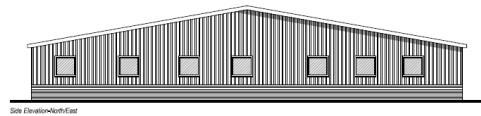
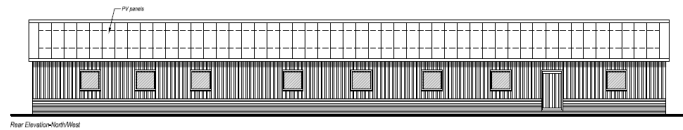
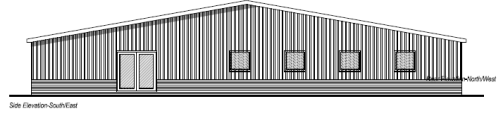
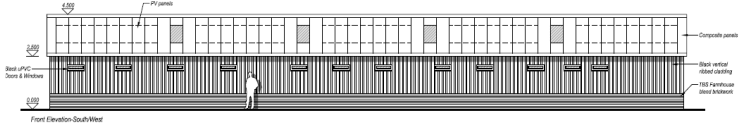
Source

Planning

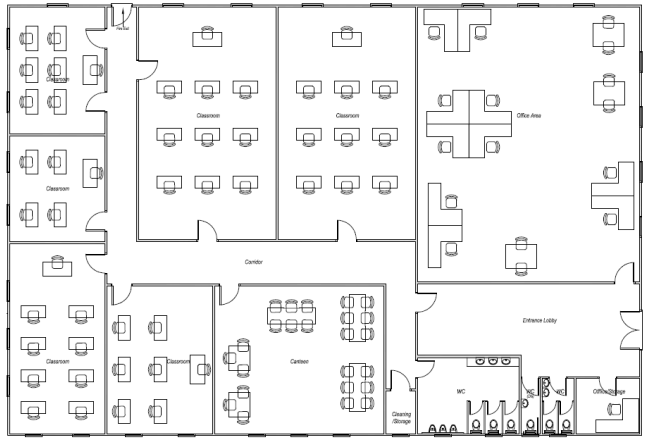
**Medusa Design Ltd**  
Architectural Designers  
Babergh House, 38 Cross Street,  
Babergh, Suffolk, CO11 1JG  
Tel: 01787 883338  
Email: info@medusadesign.co.uk  
Web Site: www.medusadesign.co.uk



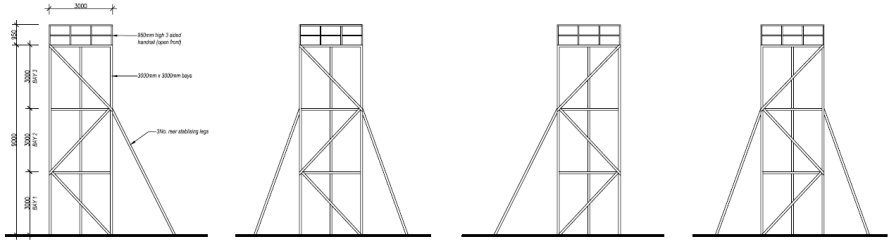
# Proposed Plans and Elevations- Training Centre and Telehandler



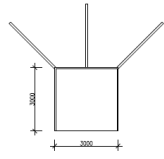
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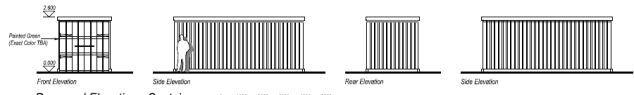
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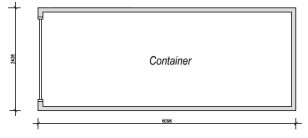
Telehandler Training Tower - Elevations  
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Telehandler Training Tower - Plan  
Scale: 1:100



Proposed Elevations-Container  
Scale: 1:100



Proposed Floor Plan-Container  
Scale: 1:50

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Rev: E: 27/08/2021 - Amended To Clients Comments

Status: **Planning**

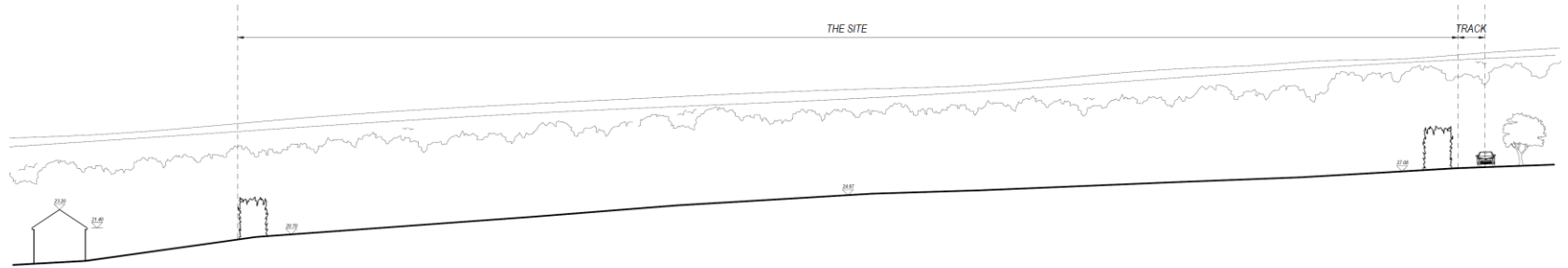
**Medusa Design Ltd**  
Architectural Designers  
Lambert Hill Farm, 30, Church Street,  
Sudbury, Suffolk, CO10 2DL,  
Tel: 01797 681239  
E-Mail: info@medusadesign.co.uk  
Web: www.medusadesign.co.uk

Client: Construction Training Services

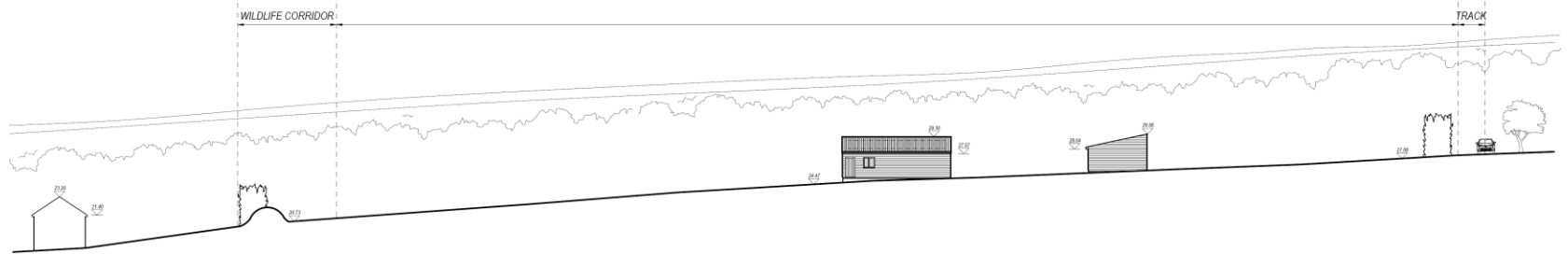
Project: Proposed Development

Drawing Details: Proposed Floors Plans & Elevations

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Number: 1820/20/03		Rev: E

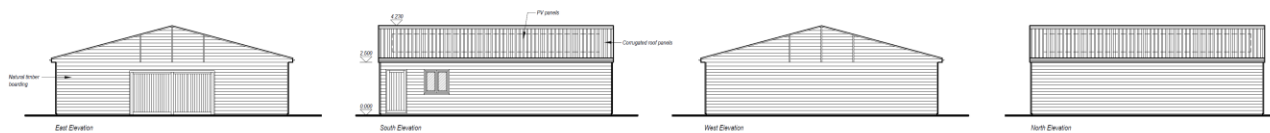


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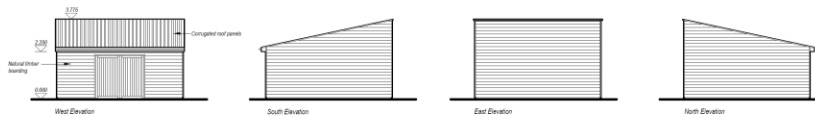


Proposed Site Section  
Scale: 1:200

Page 194



Proposed Elevations - Stable Block  
Scale: 1:100



Proposed Elevations - Storage Shed  
Scale: 1:100

Date: 10.03.2022 - Amended To Client Comments

Slides

**Planning**

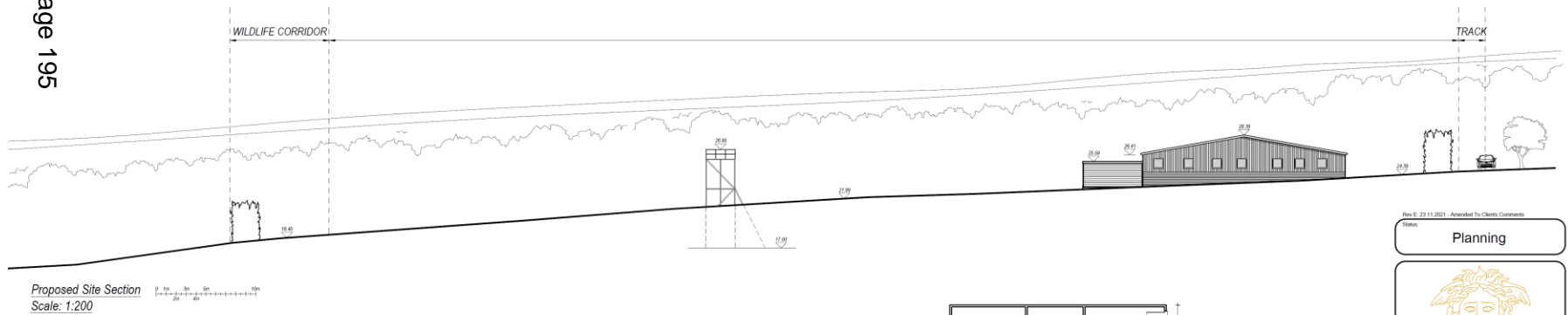
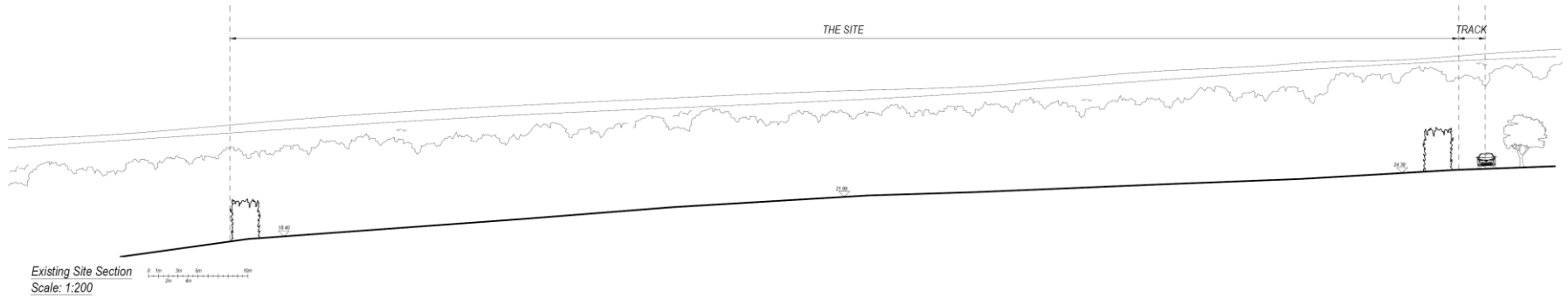
**Medusa Design Ltd**  
Architectural Designers  
Enterprise House, 38 Cross Street,  
Sudbury, Suffolk, CO10 2DL  
Tel: 01787 883339  
E-Mail: info@medusadesign.co.uk  
Web Site: www.medusadesign.co.uk

Client:  
Construction Training Services

Project:  
Proposed Development

Drawing Details:  
Existing And Proposed Site Sections A-A

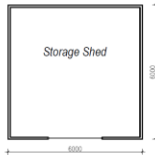
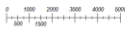
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Number:	1820/20/02	Rev: E



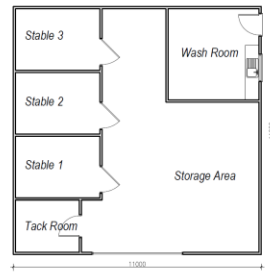
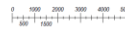
Page 195



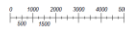
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Proposed Storage Shed  
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Proposed Stable  
Scale: 1:100



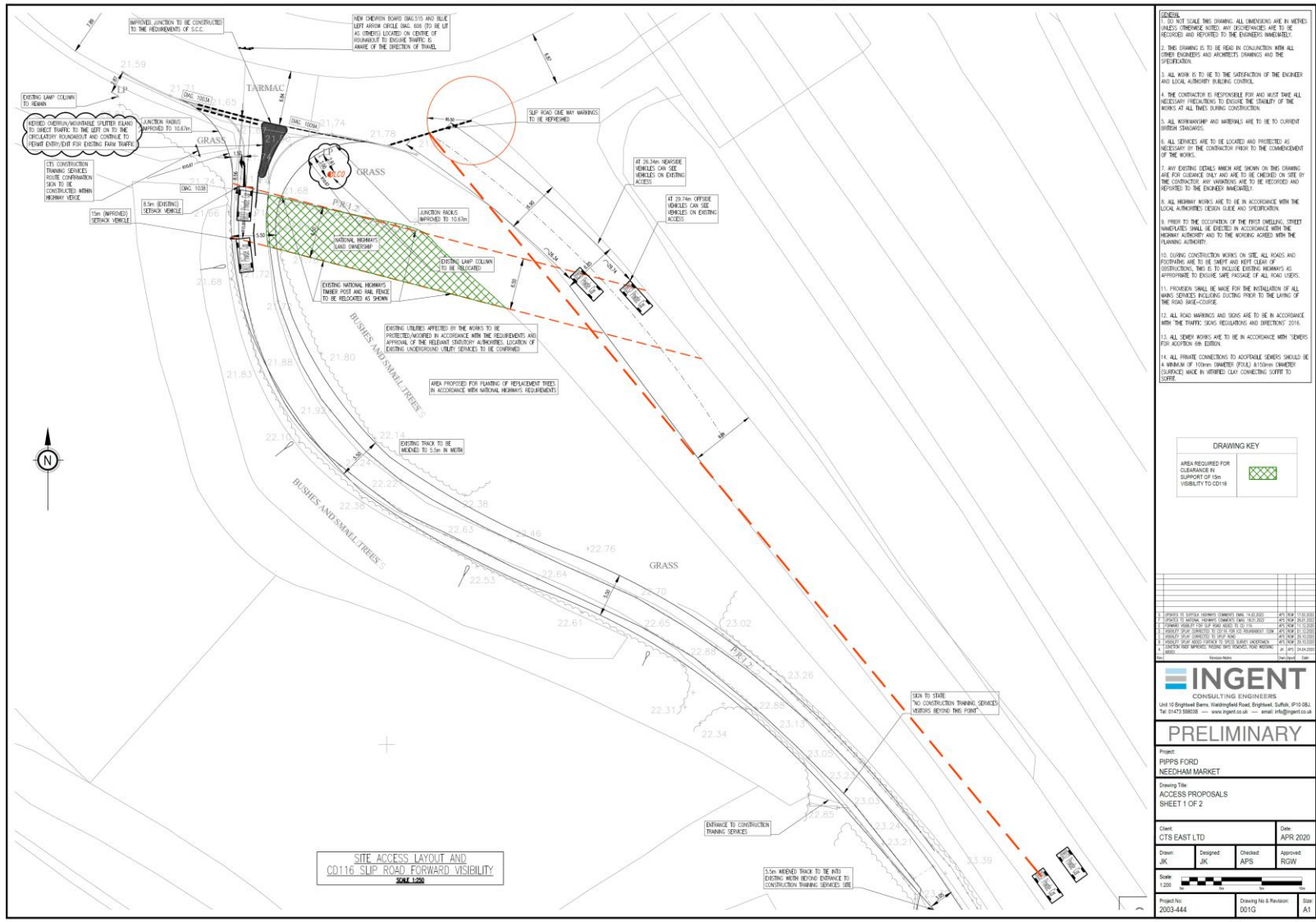
Rev E: 23/11/2021 - Amended To Clients Comments  
**Planning**

**Medusa Design Ltd**  
 Architectural Designers  
 Estover House, 30 Cross Street,  
 Sudbury, Suffolk, CO10 1DL  
 Tel: 01787 883339  
 E-Mail: info@medusadesign.co.uk  
 Web Site: www.medusadesign.co.uk

Client Construction Training Services	
Project Proposed Development	
Drawing Details Existing And Proposed Site Sections B-B & Proposed Stable and Storage Floor Plans	
Date Jan 2021	Scale 1:100 & 1:200 @ A1
Number 1820/20/05	Drawn STC Rev. E

# Access proposal – sheet 1

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  4. THE CONTRACTOR IS RESPONSIBLE FOR AND MUST TAKE ALL NECESSARY PRECAUTIONS TO ENSURE THE STABILITY OF THE WORKS AT ALL TIMES DURING CONSTRUCTION.
  5. ALL WORKMANSHIP AND MATERIALS ARE TO BE TO CURRENT BRITISH STANDARDS.
  6. ALL SERVICES ARE TO BE LOCATED AND PROTECTED AS NECESSARY BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF THE WORKS.
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  8. ALL HIGHWAY WORKS ARE TO BE IN ACCORDANCE WITH THE LOCAL AUTHORITY DESIGN GUIDE AND SPECIFICATION.
  9. PRIOR TO THE OCCUPANCY OF THE FIRST CHANGING STREET IMAGINATION SHALL BE EFFECTED IN ACCORDANCE WITH THE HIGHWAY AUTHORITY AND TO THE WORKING AGREED WITH THE PLANNING AUTHORITY.
  10. DURING CONSTRUCTION WORKS ON SITE, ALL ROADS AND FOOTPATHS ARE TO BE MARKED AND KEPT CLEAR OF OBSTRUCTIONS. THIS IS TO INCLUDE EXISTING HIGHWAYS AS APPROPRIATE TO ENSURE SAFE PASSAGE OF ALL ROAD USERS.
  11. PROVISION SHALL BE MADE FOR THE INSTALLATION OF ALL MAIN SERVICES INCLUDING DUCTING PRIOR TO THE LAYING OF THE ROAD MAKE-COURSE.
  12. ALL ROAD MARKINGS AND SIGNS ARE TO BE IN ACCORDANCE WITH THE TRAFFIC SIGNS REGULATIONS AND DIRECTIONS 2016.
  13. ALL SITE WORKS ARE TO BE IN ACCORDANCE WITH 'GENERS FOR HIGHWAYS' AND EDITION.
  14. ALL PRIVATE CONNECTIONS TO ADJOINING OWNERS SHOULD BE A MINIMUM OF 100mm (DIAMETER SPOLA) 100mm DIAMETER (DIAMETER) LAID IN APPROVED LAY CONFORMING SUITABLE TO USE.



1	ISSUED TO SUPPLY DRAWING NUMBER: 2003-444	DATE: 20/04/2020	BY: JAK	CHKD: JAK
2	ISSUED TO SUPPLY DRAWING NUMBER: 2003-444	DATE: 20/04/2020	BY: JAK	CHKD: JAK
3	ISSUED TO SUPPLY DRAWING NUMBER: 2003-444	DATE: 20/04/2020	BY: JAK	CHKD: JAK
4	ISSUED TO SUPPLY DRAWING NUMBER: 2003-444	DATE: 20/04/2020	BY: JAK	CHKD: JAK
5	ISSUED TO SUPPLY DRAWING NUMBER: 2003-444	DATE: 20/04/2020	BY: JAK	CHKD: JAK

**INGENT**  
CONSULTING ENGINEERS  
Unit 10 Digheath Barn, Wainfield Road, Digheath, Suffolk, IP10 0BL  
Tel: 01473 596038 — www.ingent.co.uk — email: info@ingent.co.uk

**PRELIMINARY**

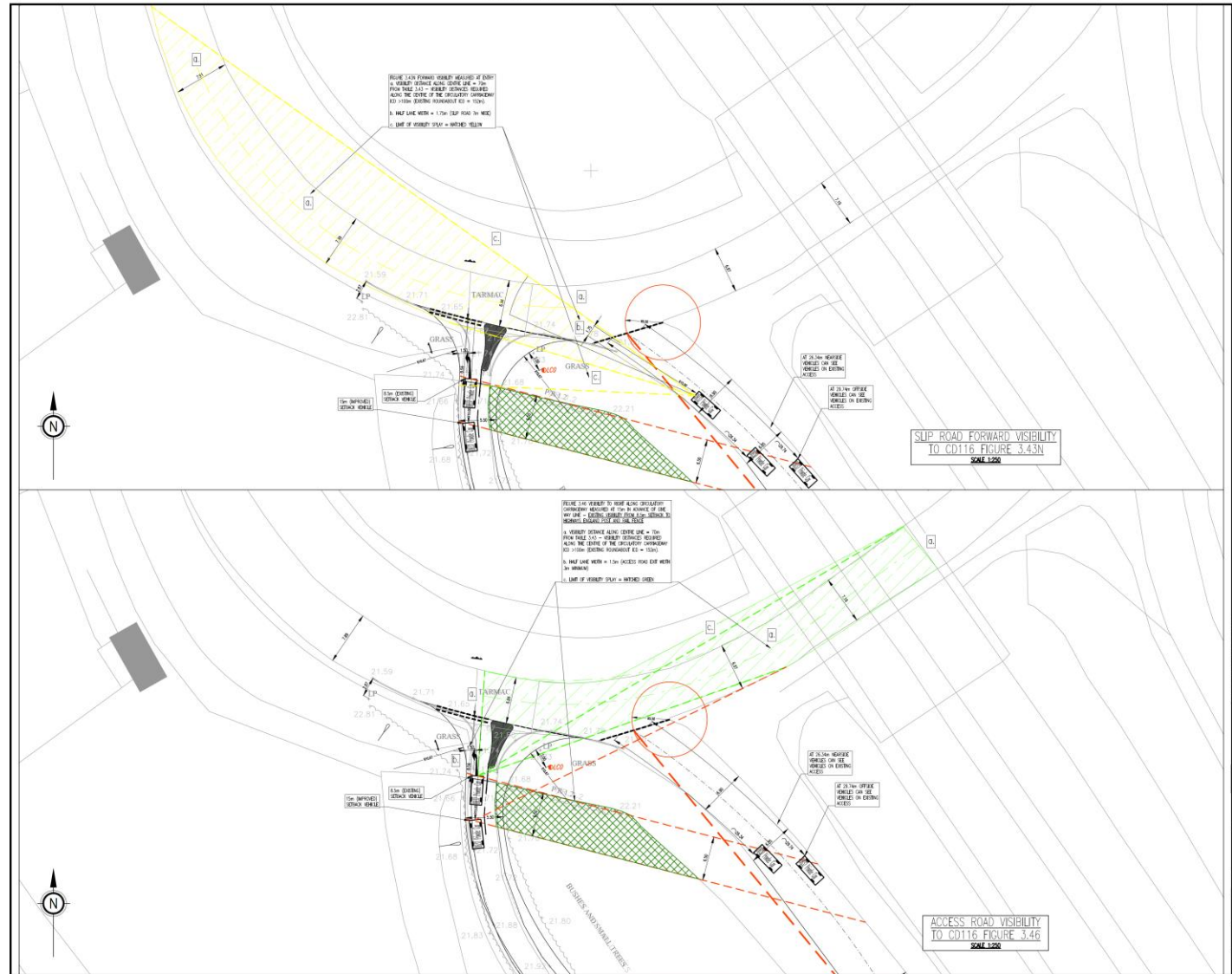
Project: PIPPS FORD NEEDHAM MARKET  
Drawing Title: ACCESS PROPOSALS SHEET 1 OF 2

Client: CTS EAST LTD	Date: APR 2020		
Drawn: JK	Designed: JK	Checked: APS	Approved: RGW
Scale: 1:500			
Project No: 2003-444	Drawing No & Revision: 0010	Sheet: 11	Of: 11



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- THE CONTRACTOR IS RESPONSIBLE FOR AND MUST TAKE ALL NECESSARY PRECAUTIONS TO ENSURE THE STABILITY OF THE WORKS AT ALL TIMES DURING CONSTRUCTION.
- ALL WORKMANSHIP AND MATERIALS ARE TO BE TO CURRENT BRITISH STANDARDS.
- ALL REPAIRS ARE TO BE LOCATED AND PROTECTED AS NECESSARY BY THE CONTRACTOR PRIOR TO THE COMMENCEMENT OF THE WORKS.
- ANY EXISTING DETAILS WHICH ARE SHOWN ON THIS DRAWING ARE FOR GUIDANCE ONLY AND ARE TO BE CHECKED ON SITE BY THE CONTRACTOR. ANY VARIATIONS ARE TO BE RECORDED AND REPORTED TO THE ENGINEER IMMEDIATELY.
- ALL NEARBY WORKS ARE TO BE IN ACCORDANCE WITH THE LOCAL AUTHORITY DESIGN GUIDE AND SPECIFICATION.
- PRIOR TO THE OCCUPATION OF THE FIRST TRAVELLING STREET ROADWORK SHALL BE EXECUTED IN ACCORDANCE WITH THE HIGHWAY ACTIVITY AND TO THE WORKING AGREED WITH THE PLANNING AUTHORITY.
- WORKING CONSTRUCTION WORKS ON THE ALL SEAS AND PROTECTIVE ARE TO BE SILENT AND KEPT CLEAN AT ALL TIMES. THIS IS TO INCLUDE EXISTING HIGHWAYS AS APPROPRIATE TO ENSURE THE PROTECTION OF ALL ROAD USERS.
- PROVISION SHALL BE MADE FOR THE INSTALLATION OF ALL MANS SERVICES FOLLOWING DUCTING PRIOR TO THE LAYING OF THE ROAD INFRASTRUCTURE.
- ALL ROAD MARKINGS AND SIGNS ARE TO BE IN ACCORDANCE WITH THE TRAFFIC SIGNS REGULATIONS AND ORDINANCE 2016.
- ALL SEWER WORKS ARE TO BE IN ACCORDANCE WITH SEWERS FOR ADOPTION IN ENGLAND.
- ALL PRIVATE CONNECTIONS TO ADAPTABLE SERVICES SHOULD BE A MINIMUM OF 100mm DIAMETER (PUSH) 475mm DIAMETER (PULL) MAKE IN WITNESSED CLAY CONNECTING SIGHT TO SEWER.

**DRAWING KEY**

AREA REQUIRED FOR CLEARANCE IN SUPPORT OF ROAD VISIBILITY TO CD116

**INGENT CONSULTING ENGINEERS**  
 Unit 10 Brightwell Barn, Widdingham Road, Brightwell, Suffolk, IP10 0BU  
 Tel: 01473 598238 — www.ingent.co.uk — email: info@ingent.co.uk

**PRELIMINARY**

Project: PIPERS FORD NEEDHAM MARKET

Drawing Title: ACCESS PROPOSALS CD116 ROUNDABOUT VISIBILITY SHEET 2 OF 2

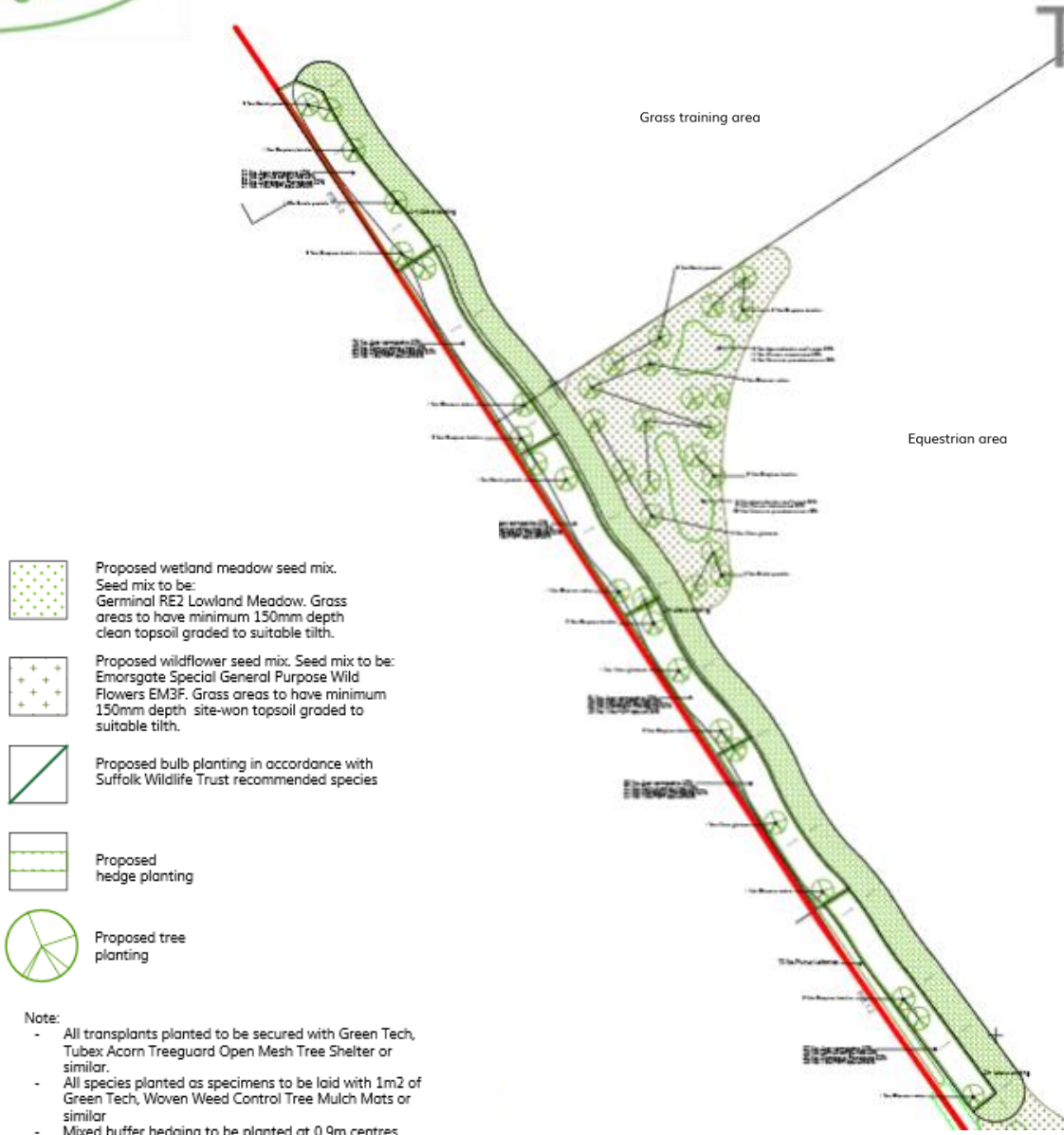
Client: CTS EAST LTD Date: APR 2020






Drawn: JK Designed: JK Checked: AFS Approved: RGW

Scale: 1:250

Project No: 2003-444 Drawing No & Revision: 002A Size: A1

# Soft Landscaping Plan



- 
 Proposed wetland meadow seed mix. Seed mix to be: Germinal RE2 Lowland Meadow. Grass areas to have minimum 150mm depth clean topsoil graded to suitable tilth.
- 
 Proposed wildflower seed mix. Seed mix to be: Emorsgate Special General Purpose Wild Flowers EM3F. Grass areas to have minimum 150mm depth site-won topsoil graded to suitable tilth.
- 
 Proposed bulb planting in accordance with Suffolk Wildlife Trust recommended species
- 
 Proposed hedge planting
- 
 Proposed tree planting

- Note:
- All transplants planted to be secured with Green Tech, Tubex Acorn Treeguard Open Mesh Tree Shelter or similar.
  - All species planted as specimens to be laid with 1m<sup>2</sup> of Green Tech, Woven Weed Control Tree Mulch Mats or similar
  - Mixed buffer hedging to be planted at 0.9m centres
  - Prunus lusitanica hedge to be planted at 0.4m centres



# Soft Landscaping Plan 3



Proposed wetland meadow seed mix. Seed mix to be: Germinal RE2 Lowland Meadow. Grass areas to have minimum 150mm depth clean topsoil graded to suitable tilth.



Proposed wildflower seed mix. Seed mix to be: Emarsgate Special General Purpose Wild Flowers EM3F. Grass areas to have minimum 150mm depth site-won topsoil graded to suitable tilth.



Proposed bulb planting in accordance with Suffolk Wildlife Trust recommended species



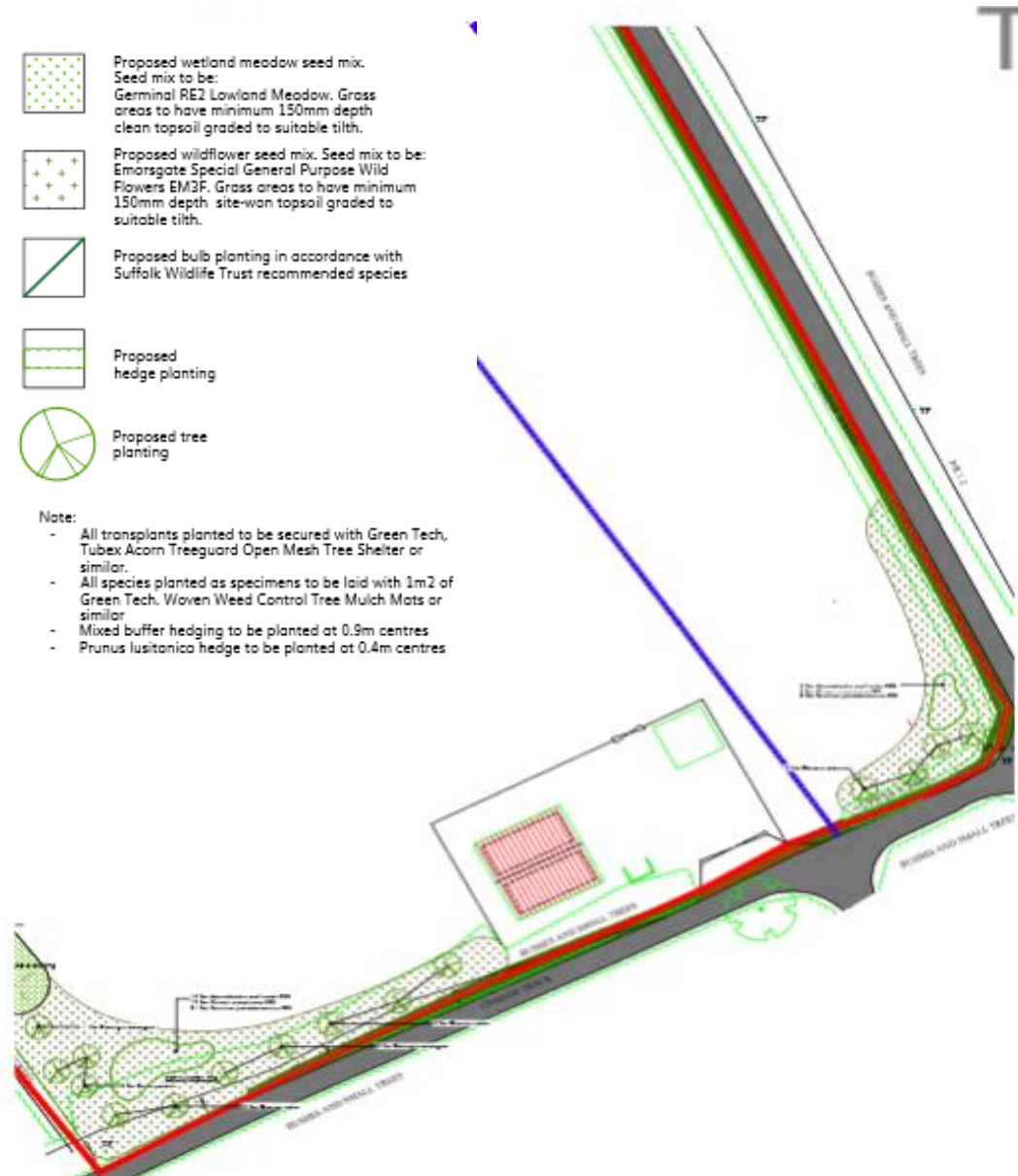
Proposed hedge planting



Proposed tree planting

**Note:**

- All transplants planted to be secured with Green Tech, Tubex Acorn Treeguard Open Mesh Tree Shelter or similar.
- All species planted as specimens to be laid with 1m<sup>2</sup> of Green Tech. Woven Weed Control Tree Mulch Mats or similar
- Mixed buffer hedging to be planted at 0.9m centres
- *Prunus lusitanica* hedge to be planted at 0.4m centres



# Agenda Item 7c

## Committee Report

**Item No:** 7C

**Reference:** DC/21/06824

**Case Officer:** Mahsa Kavyani

**Ward:** Stradbroke & Laxfield.

**Ward Member/s:** Cllr Julie Flatman.

---

## **RECOMMENDATION –GRANT PLANNING PERMISSION WITH CONDITIONS**

---

### **Description of Development**

Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

### **Location**

Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

**Expiry Date:** 03/10/2022

**Application Type:** FUL - Full Planning Application

**Development Type:** Major Large Scale - All Other

**Applicant:** C E Davidson Farms Ltd.

**Agent:** Mr Jonny Rankin

**Parish:** Stradbroke

**Site Area:** 3.5 hectares

### **Density of Development:**

Gross Density (Total Site): N/A

Net Density (Developed Site, excluding open space and SuDs): N/A

**Details of Previous Committee / Resolutions and any member site visit:** None

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

**Has the application been subject to Pre-Application Advice:** No

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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

The Head of Economy considers the application to be of a controversial nature.

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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### **Summary of Policies**

FC01 - Presumption In Favour Of Sustainable Development

FC01\_1 - Mid Suffolk Approach To Delivering Sustainable Development  
CS02 - Development in the Countryside & Countryside Villages  
CS03 - Reduce Contributions to Climate Change  
CS05 - Mid Suffolk's Environment  
GP01 - Design and layout of development  
T10 - Highway Considerations in Development  
T09 - Parking Standards  
CL08 - Protecting wildlife habitats  
CL13 - Siting and design of agricultural buildings  
CL14 - Use of materials for agricultural buildings and structures  
CL15 - Livestock buildings and related development  
H16 - Protecting existing residential amenity  
CL17 - Principles for farm diversification

Additional guidance and relevant documents:

- Environmental Permitting (England and Wales) Regulations (2016);
- Conservation of Habitats and Species Regulations (2017);
- Habitats Directive;
- Countryside and Rights of Way Act 2000;
- Natural Environment and Rural Communities Act (2006);
- Environmental Protection Act (1990);
- Wildlife and Countryside Act (1981);
- Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations (1999); and
- National Planning Policy Framework.
- National Planning Policy Guidance

### **Neighbourhood Plan Status**

This application site is within a Neighbourhood Plan Area.

The Neighbourhood Plan is currently at:-

Stage 7: Adoption by LPA

Accordingly, Stradbroke Neighbourhood Plan has full weight.

Below policies are relevant and directly apply in this case.

- POLICY STRAD1: DEVELOPMENT STRATEGY AND PRINCIPLES
- POLICY STRAD2: DESIGN PRINCIPLES
- POLICY STRAD4: UTILITIES PROVISION
- POLICY STRAD5: FLOOD MITIGATION
- POLICY STRAD11: HISTORIC ENVIRONMENT & DESIGN
- POLICY STRAD12: LIGHT POLLUTION
- POLICY STRAD13: EMPLOYMENT PROVISION



## **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 Councils (Appendix 3)**

**Stradbroke Parish Council** latest response (submitted 16 August 2022): OBJECT

##### 1. Water

a. The covering letter submitted with the updated Environment Statement states the development would not require a new supply, however this does not address the matter as the Water Cycle Study for Babergh and Mid Suffolk states: “ESW commented that the supply headroom in its Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development”. The additional reports do not address the increased demand for water in this non-household development.

b. The applicant’s agent also states that: “this is before any additional provision via rainwater harvesting”. The Parish Council can find no reference in the submitted documents to rainwater harvesting. The flood risk assessment prepared in June 2021 by Plandescil identifies on p.18, point 6.6, that surface water runoff from the proposed hardstanding (2.071ha including roofs, yard, and access) will discharge into an attenuation system which will outfall into the ditch on the northern boundary of the site via a flow control. In addition, the report identifies on p.17 that “rainwater harvesting could be provided, however due to the end use, the re-use of the water is unlikely”.

##### 2. Odour

a. P.14 of the submitted Odour Assessment notes at point 3.6.5 that the odour impacts during the clear out periods were not represented within the model used to determine whether there would be any impact on the surrounding properties. This includes the odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed.

b. P.35 of the Transport Assessment shows that the clear out process for the proposed 6 sheds will take place over 2 days, this combined with the days required to clear the existing 9 sheds could mean the highest level of odour emissions could be reached on a considerable number of days in every year, yet has not been modelled. Therefore, given that peak emissions are likely to be significantly higher than at other times it is necessary for the applicant to provide details about the upper limits of these emissions in order for the impacts of the clear-out process of the sheds to be assessed.

c. The odour assessment accepts that the clear out process will result in increased odour emissions, therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is therefore not certain that Policy CL17 will not be breached as there is no evidence that there will be no materially detrimental effect on nearby residential amenity.

In addition, there is no reference to the scale of odour emissions that may arise over the full rearing cycle or over the different times of the year.

d. East Suffolk Council commissioned an independent review of an odour impact assessment submitted to support a planning application for 3 poultry units, this review has highlighted flaws in the methodology of that report which the Parish Council feel are also reflected in the methodology used to prepare the odour report submitted in relation to this application.

e. The applicant's agent has pointed out the responsibility for odour management rests with the Local Planning Authority. Therefore the Parish Council would urge officers to carry out the same rigorous investigations as East Suffolk Council to verify the outcomes of the submitted odour report. Once this has been undertaken the views should be sought of Mid Suffolk's Environmental Protection Officers on the potential detrimental effect on nearby residential amenity of the peak emissions during clear out days and the increased emissions through the growing cycle and the impact these would have over the course of the year.

f. Odour assessment: on pages 10 & 15, footnotes 12 & 14 reference IPPC SRG 6.02 (Farming) - Odour Management at Intensive Livestock installations, EA, 2003 – this guidance does not contain the information referenced on the pages. Mid Suffolk officers will need to ensure that the correct guidance has been evaluated and referenced.

### 3. Waste (litter and water)

a. The agent's covering letter for the environmental statement highlights on p.1, 3rd bullet point, that there is a letter of undertaking from the applicant in relation to the muck arising and an upcoming contract with Melton Renewable Energy UK Limited. The attached letter states the following: "Please accept this letter as confirmation of our intention to send all muck generated from the proposed poultry houses..... for use in the generation of electricity at either Eye or Thetford ...." The applicant goes on to qualify this statement with another as follows: "Although the specific destination of the muck remains a commercial decision subject to future contract negotiations ....".

b. The statements above from the applicant do not prevent spreading of the waste nearby the site should that become more convenient or economic. Odour and dust impacts from the spreading of the waste are therefore a foreseeable indirect effect of the proposed development in the absence of a condition or planning obligation ensuring that the waste will in fact be delivered to Eye or Thetford Power Stations. Particularly given that the permitting documents previously submitted by the Parish Council show the intention for the disposal of litter is as follows: "At the end of the rearing periods after chickens have been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel."

c. The Parish Council notes from documents submitted to East Suffolk Council that the Environment Agency make explicitly clear that the amenity impacts arising from waste management are to be dealt with by the Local Planning Authority.

d. The recently submitted documents do not address the issue of disposal of waste water and therefore the Parish Council reiterates the following:

i. The Transport Assessment in Table 4.1 on p.14 states that there will be 2 x artic of waste water per cycle (7.5 cycles per annum). Each load carries 30,000 litres (p. 34 Annex E Transport Assessment) giving an annual total of 450,000 litres of waste water.

ii. Point 6.18 (p.43) of the Environment Statement states that the waste water from cleaning the units will be taken from site in sealed tankers – the report is silent on the destination of the waste water.

iii. As part of the submitted EA permitting documents it is stated that: "Dirty water spread on land under the control of a separate farming business and a written agreement is in place."

iv. None of the documentation submitted identifies where the separate farming business is situated and there is no evidence submitted that the waste water would be treated or that the spreading of waste water on land would not have a detrimental environmental impact.

### 4. Highways

a. The Parish Council notes the copies of recent correspondence between the applicant's agent and Suffolk County Council Highways in which the holding objection has been removed.



b. The Parish Council notes from this correspondence that Suffolk County Council Highways stated the following: "The impact upon the B1118 in Stradbroke is a greater concern but as this forms part of the Suffolk Lorry Route network and not all of the (modest number of) HGV journeys involve this route, it is something we will have to accept."

c. The Parish Council continues to seek reassurance from both Mid Suffolk and Suffolk County Councils that the risk posed to pedestrians of an HGV mounting the only pavement to enable vehicles to pass each other on the B1118 in the village (Queens Street) has been thoroughly and rigorously reviewed as the emails from highways do not show this to be the case. There is no evidence submitted that this application can mitigate the impact on highway safety of the additional vehicle movements on the B1118, which is not in accordance with NPPF paragraph 110.

*Officer Note : The applicant has informed the officer that they will provide clarity on matters of water ahead of committee, also they have pointed out that odour arising from the clean down is modelled at max emission rate (to represent worst case).*

### **Horham & Athelington Parish Council: OBJECT**

#### 1) HGV Movements and Cumulative Impact

Current Situation HGVs associated with the Cranswick (Crown) poultry feed mill, which is situated in Denham, currently route through Horham travelling east to Stradbroke and beyond and south to Worlingworth and beyond, transporting poultry feed to Cranswick's large network of intensive poultry units in the region; the HGVs return via the same routes. Horham residents have noticed a significant increase in the number of HGVs travelling through the village within the last two years, since Crown Milling began operating from the site in Denham and it must be pointed out that the poultry feed lorries have been witnessed travelling in both directions through the village, not, as claimed in the applicant's Environment Statement (S5.43) that: "... Denham Mill operates a one-way system with traffic routing in via Hoxne and leaving toward Horham via Fennings Farm." The B1117 runs through Horham and is not a designated HGV route on the SCC Lorry Route Network. In fact, HGVs travelling between Horham and Stradbroke have to negotiate a tight double bend just outside the Horham village 30mph sign which necessitates HGVs crossing the central white line on the bends. In addition, increased HGV movements on the route between Horham and Stradbroke have been a major contributing factor to the collapse of the high roadside bank near the bridge over Chickering Beck in 2020, where the road width is narrower. Temporary traffic lights had to be installed by SCC Highways, as only a narrow section of the carriageway was passable and remained in place for over a year (between late 2020 and 2021) until finally being removed in December 2021. However, this stretch of road is on an incline and frequently experiences water run-off from adjoining fields during periods of heavy rain, which in turn causes road surface water to rapidly course downhill towards the Beck. This, in addition to increasing HGV movements will lead to further erosion of the roadside bank and will become an ongoing problem and potential road safety hazard.

#### Proposed HGV Movements

With regard to planning application DC/21/06824, the Parish Council notes that S5.41 of the Environment Statement states: "The following elements and their location are offered as informative and based on existing contracts (they are of course subject to the market and contracts in the event of planning permission): Feed – Denham Mill (30%) and Kenninghall Mill (70%)". Given the applicant's caveat in brackets and the fact that Denham Mill is situated closest to the application site, it is safe to assume that 30% of the additional 674 HGV movements of feed per year will represent the minimum increase in HGV traffic through Horham and surrounding villages. Denham Mill (Crown Milling) acquired an Environmental Permit in 2021 to increase the production of poultry feed, resulting in nearly 20,000 HGV movements a year. The growing number of HGVs associated with this business, travelling through Horham, has had a detrimental impact on the living conditions of local residents on The Street, especially with regard to the enjoyment of gardens and outdoor space, where conversations are curtailed when two or three lorries pass in quick succession. An increase in HGV traffic associated with this planning application will have a further detrimental impact on the amenity of residents of Horham. The Environmental Statement S2.8 Table 2

includes the following SCC Highways (31.3.21) recommendation in the Scoping Report: “The application should consider any impacts the additional traffic generated by the development will have on the highway network when the facility is in production....” “A Transport Management Plan will also be required. Once the details are supplied, mitigation may be required on the existing highway within surrounding villages; including Eye Town centre.” The Parish Council is of the view that the applicant’s Transport Assessment does not provide adequate analysis of the cumulative impact of HGV movements on routes between surrounding villages, specifically Horham and including Denham, Stradbroke and Hoxne. The Transport Assessment does not address how highway safety issues highlighted by Denham Parish Council (concerning the significant increase in the volume of HGVs accessing and leaving the poultry feed mill in Denham and the resulting detrimental impact on the amenity of residents and rising highway safety concerns), Stradbroke Parish Council (concerning restricted two-way HGV movements and the impact on highway safety on Queen Street) and Hoxne Parish Council (concerning the number of vehicle collisions along Chickering Road (B1118) Hoxne, near the entrance to the Depperhaugh Care Home – see SCC Highways Report, November 2019) can be mitigated. With regard to the SCC Highways Report on Chickering Road (B1118), it should be noted that HGVs transporting poultry feed to and from the mill in Denham, access and exit the B1118 via a junction near the Depperhaugh Care Home, by way of a single carriageway, narrow lane, classified ‘C’ road, also known as Chickering Road. According to the SCC Highways report there were seven collisions in the 5 year period to 2019, two classified as ‘serious’ near the entrance to the Depperhaugh Care Home. The applicant’s Environment Statement (S5.25) states that “Links or junctions that exhibit 1 accident per annum are considered to be significant” and continues “Taking this into consideration, it is therefore considered that there are no existing highway safety issues on the local highway network”. S5.26 “... there are no highway safety issues that the development is expected to exacerbate.” The Parish Council is of the opinion that the proposed development will exacerbate the highway safety issues already identified by Denham, Hoxne and Stradbroke and will exacerbate the problem of roadside erosion on the stretch of the B1117 between Horham and Stradbroke. The planning application does not identify how the proposed development will meet the requirement of NPPF para.110(d) and is contrary to Policies CL15 and CL17 of the Local Plan.

#### Waste

The Parish Council wishes to bring attention to the fact that there is a lack of information concerning the destination of waste from the application site. The Variation to the Environmental Permit for the facility states: “Litter will be exported from the installation. Records will be kept of the quantities and the date of transfer, for example to a power station for recovery or third party for spreading on land and the names and addresses of the receiving farms.” The removal of waste litter from the application site will generate significant numbers of HGV movements and if not destined for power stations, will be spread on land (unspecified in the supporting documentation for the planning application) which does not belong to the applicant. Legal judgement in the cases of *Squire v Shropshire Council* and *Keating v East Suffolk Council* requires that the land destined for the spreading of poultry waste must be identified, for direct and indirect environmental effects to be properly assessed. This lack of information concerning the removal of waste (both poultry litter and waste water) reinforces the Parish Council’s view that the applicant’s Transport Assessment does not provide adequate analysis of the cumulative impact of HGV movements on routes between surrounding villages, specifically Horham and including Denham, Stradbroke and Hoxne.

3) Water usage This planning application will have a very high demand for water. Whilst high water consumption by the poultry meat processing factory on Eye Airfield has been accounted for in the Water Cycle Study (2020), the high demand for water by an increasing number of intensive poultry units supplying the meat factory have not. Moreover, the Statement of Common Ground between BMSDC and Essex & Suffolk Water (2020) makes clear that that Essex & Suffolk Water “is unable to provide water in the current ...plan period for new non-domestic processing activities” and that to be able to support such ‘non domestic’ water consumption would “require investment in infrastructure or water transfer, which would unlikely be operational until 2027”. This planning application may put residential development plans at risk but the issue has not been addressed in any of the supporting documentation for the planning application.

## Summary

Whilst not a formal consultee, Horham & Athelington Parish Council wish to object to planning application DC/21/06824, on the basis of concerns relating to planning matters outlined above.

### **Fressingfield Parish Council: SUPPORT**

The council noted the fact that HGV traffic would not flow through Fressingfield and recognises the positive effect on the local economy due to the growth in the chicken-economy.

The council recommends approval of this application.

### **National Consultee (Appendix 4)**

#### **Historic England: NO COMMENTS**

##### **Natural England: NO OBJECTION**

- Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

#### **The Environment Agency: No objections**

#### **Odour**

We have noted the clarification provided by the applicant on the number of broilers that the farm will house - being 530,000 operationally (rather than 570,000 as in the Environmental Permit). Therefore, we now consider this aspect of the odour modelling to be appropriate. Although the odour emissions from the gable end fans are not included in the Odour Modelling and Assessment, we would suggest that you consider this in your assessment of this application, that they are used during hot weather (depending on the age of the broilers) and that these are the days when residents tend to either be outside in their gardens or have house windows open.

### **County Council Responses (Appendix 5)**

#### **Archaeology: COMMENTS**

- There is high potential for below ground heritage assets.
- No grounds for refusal.
- Conditions to secure archaeological investigation and recording if permission granted.

#### **Fire and Rescue: COMMENTS**

- Development must comply with Building Regulations for access and fire fighting facilities.
- Sprinkler system should be considered.

#### **SCC Flood and Water Management: COMMENTS**

Recommend approval subject to conditions.

#### **Highways: NO OBJECTIONS**

Further to additional correspondence and information from the applicant's consultants, a further site visit and consideration of the proposal, we are no longer in a position to uphold an objection on this proposal. Whilst the proposal will generate a modest increase in HGV traffic, it is not at a level that we could maintain

an objection upon as having a severe or unacceptable impact (NPPF 111). It should also be noted that significant parts of the identified routes form part of the Suffolk Lorry Route network.

Travel Plan Officer: NO COMMENTS

### **Internal Consultee Responses (Appendix 6)**

Heritage and Design Officer: COMMENTS

This application is for the erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development).

The heritage statement accompanying the application describes the impact of the scheme on the nearby designated and undesignated heritage assets. It concludes that the development would result in less than substantial harm to the significance of the Grade II Listed Old Hall Cottage (List UID: 1182816) and that this harm would be at the lower end of the scale. This impact is due to the visibility= of the proposed sheds, within the wider setting of the Listed cottage. The Heritage Statement also concludes that there would be no impact on the significance of the other heritage assets, due to separation and the lack of visibility.

In general, I agree with this assessment of the scheme's visual impact. However, the impact on a heritage assets setting cannot be limited to views alone. Other environmental factors, such as noise, increased traffic, vibrations, dust, light, etc, all will have an impact on the setting of a heritage asset. The Noise Impact Assessment was carried out by Matrix Acoustic Design Consultants and while their assessment does not specifically target the nearby heritage assets, in general they can be considered to be included within the areas assessed. The noise impact assessment states that the majority of transport movements will occur during the working day (07:00 – 20:00hrs), presumably with a minority of further movements also occurring outside of the working day hours. It also states that "the cumulative noise emissions from roof extract fans with the addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels." I conclude from this that there will be a low level of negative impact, due to noise and traffic, particularly on heritage assets closest to the development site.

An assessment of the impact of odours was carried out by Redmore Environmental. The assessment area covered included the majority of the designated and non-designated heritage assets and the subsequent report concludes that the "predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant." I conclude from this that there is likely to be a negligible impact on the setting and significance of the heritage assets, from the odours associated with the operation of the development.

Therefore, the scheme would potentially result in a low level of less than substantial level of harm to the nearby designated heritage assets, due to the negative effect on environmental factors (noise) on their setting, along with a low level of less than substantial level of harm resulting from the detrimental visual impact specifically on the Grade II Listed Old Hall Cottage.

The national Planning Policy Framework (NPPF) states that any harm to, or loss of, the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification (paragraph 200). In paragraph 206 the NPPF states that local planning authorities should look for opportunities for new development within the setting of heritage assets, to "enhance or better reveal their significance". Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. I do not find

that the proposed development enhances or preserves the positive elements of the setting of the nearby heritage asset and I do not believe the negative impacts of the scheme could be successfully mitigated.

Therefore, the result of the development would be a low level of less than substantial harm to the nearby heritage assets, which would need to be weighed against the public benefits of the proposal, in accordance with Paragraph 202 of the NPPF.

Waste Management Officer: NO COMMENT

Place Services- Ecology

Objections for the required additional information upon statutory designated sites (Chippenhall Green Site of Special Scientific Interest) has been withdrawn. Conditions have been recommended.

Environmental Health Officer (Noise/Odour/Light, etc): COMMENTS

Having reviewed the sites planning history and associated planning documentation we would offer the following observations.

- Pixley Farm currently operates as a poultry farm with 9 sheds housing approximately 259,000 birds. Each growing cycle is 38 days with 7.5 cycles per year.
- There are a number of residential dwellings in the locality which are privately owned and occupied. The closest of these is approximately 415 metres to the east.
- A Scoping Opinion was issued in April 2021.
- This service provided the following comments in respect of the scoping opinion; Having reviewed the submitted proposal and the Parker Planning Services scoping report dated March 2021 I am satisfied that the odour and ammonia methodology is acceptable. Can I ask that the consultants confirm whether the assessed levels will incorporate the existing on site poultry houses to show the overall effect from the site as the combined emissions will form part of the same operation.
- The units would be ventilated with ridge mounted fans. Gable end fans are also proposed to be used when temperatures exceed 28 degrees or in the event of ridge fan failure.
- An odour assessment has been undertaken by Redmore Environmental (13th October 2021), which outlines: "potential odour releases were defined based on the size and nature of the existing and proposed rearing operations. These were represented within a dispersion model produced using ADMS-5. Impacts at sensitive receptors in the vicinity of the site were quantified, the results compared with the relevant odour benchmark levels and the significance assessed in accordance with the IAQM guidance. Predicted odour concentrations were below the relevant EA odour benchmark level at all receptor locations for all modelling years. The significance of predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.
- The site is permitted by the Environment Agency (Permit No EA/EPR/BP3633UQ/V006).
- Waste will be removed directly from sheds onto covered lorries, there is no interim site storage.
- A diverter valve will direct foul water arising from site to sealed underground storage tanks pending removal by contractor from site.
- No details have been provided in relation to storage or disposal of dead birds.
- An Ammonia assessment has been provided by C.E Davidson
- A noise assessment in accordance with BS4142:2014 has been undertaken by Matrix Acoustic Consultants (May 2021). The report concludes that:
  - The BS4142 noise impact of the extract fans and transport activities during the day and evening will be low (with the contribution of the gable end fans) to very low (without the gable end fans).

- During the night the aggregate ambient noise ingress via an open window of the roof extract fans and transport activities have been established to be below the existing underlying noise environment and >10dB below BS8233's noise ingress limits for bedrooms (limits are applicable to road traffic and continuous operating plant).
- Background noise levels at Positions 1, 3 and 4 are:
  - • Day (07:00 – 20:00hrs): LA90 36dB
  - • Evening and night (20:00 – 07:00hrs): LA90 26dB
  - • Night (23:00 – 07:00hrs): LA90 23dB
- The individual maximum noise events generated by the HGVs loading/unloading will result in noise ingress levels via an open window below LA<sub>max,F</sub> 45dB. In accordance with ProPG (2017) this indicates a negligible noise impact with regard to sleep disturbance.
- We therefore conclude that during the night the absolute noise levels will result in a very low noise impact.
- The Rating Levels of the roof extract fans will be at highest 10dB below the typical background noise levels during the day and evening, and result in an inaudible 3dB noise ingress.
- addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels.
- The cumulative noise impact of the enlarged poultry development will be low day and night.

*Officer Note: Disposal of fallen stock/dead birds are covered by Animal By-Products (Enforcement) (England) Regulations 2013. This is the governing body that deals with this matter and the applicant is responsible for the safe and legal collection disposal of the fallen stock (dead livestock).*

*They can either make arrangements for the fallen stock to be disposed of at an approved premises, or they can use the National Fallen Stock Company (NFSCo).*

Environmental Health Officer (Contamination): NO OBJECTION

Environmental Health Officer (Air Quality): NO OBJECTION

## **B: Representations**

At the time of writing this report 5 letters/emails/online comments have been received. It is the officer opinion that this represents 5 objections. A verbal update shall be provided as necessary.

Views are summarised below:-

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

- Negative impact of additional HGV traffic.
- Impact on pedestrian and highway safety.
- Road network condition / capacity unsuitable.
- Poor visibility, speed limit ignored.
- Odours, smell of ammonia.
- MSDC has a duty of care for communities and heritage.
- Cumulative impact of poultry industry in the locality.
- HGVs travelling on narrow roads with no passing places.
- HGV movements already have negative impacts on the quality of life of local residents.
- Concerns not all HGV traffic generation is being assessed.
- Disagreement with SCC Highways consultation advice.
- Disposal of dead birds

## **PLANNING HISTORY**

**REF:** DC/21/01541                    SCOPING OPINION PROPOSED DEVELOPMENT: 6no POULTRY HOUSES WITH ASSOCIATED ADMIN BLOCKS, FEED BINS AND ANCILLARY EQUIPMENT

**REF:** DC/21/01541                    SCOPING OPINION PROPOSED DEVELOPMENT: 6no POULTRY HOUSES WITH ASSOCIATED ADMIN BLOCKS, FEED BINS AND ANCILLARY EQUIPMENT

**REF:** 1083/09                    Erection of 2 No. Chicken Sheds.                    **DECISION:** REC

**REF:** 0539/88                    Erection of two poultry houses and feed bins with alteration to existing access                    **DECISION:** GTD 08.08.1988

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## **PART THREE – ASSESSMENT OF APPLICATION**

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### **1. The Site and Surroundings**

1.1 The application site is a part of an existing poultry operation comprising 9no. poultry sheds with a 259,000-bird maximum stocking density at Fennings Farm, Pixey Green, approximately 2.1km to the south west of Fressingfield and 2.5km to the north east of Stradbroke. The site is approximately 7.5 km to the south of the town of Harleston (Norfolk) and 10km from Eye (Suffolk). Fennings Farm is accessed from a minor road running between the B1118 (Battersea Hill) to the west and Stradbroke Road to the east.

1.2 There are some residences and commercial properties in the area surrounding the site of the proposed poultry houses at Fennings Farm. The closest residential property is Fennings Farm (formerly White House Farmhouse), which is under the applicant's ownership and lies approximately 145m to the south-east; thereafter North Lane Cottage 415m to the east is the closest non-involved residence. There are several other residences, farmsteads, and commercial properties further afield.

1.3 The character of the surrounding area is predominantly open and rural, as noted with a limited number of interspersed residential and agricultural buildings to the south-east of the site. The site is heavily screened from public views from the public highway by existing mature vegetation.

### **2. The Proposal**

2.1 The proposal is for the "Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development." Planning permission is sought for the 6no. sheds as extension to the existing 9no. shed Poultry Production Facility at Fennings Farm. The 6no. proposed additional sheds would have a potential 308,000 bird capacity, with each shed holding up to 51,300 birds. This would increase the number of birds on site from 259,000 at present to 565,000 overall. The chickens would be hatched in the shed and grown to 38 days old and there would be approximately 7.5 flocks per annum. Each of the proposed poultry sheds is 110.5m x 22.9m. The proposed poultry houses would be ventilated by 18no. high speed ridge or roof fans per shed, with backup ventilation provided by gable end fans.

2.2 The development comprises the following elements:

- 6 Poultry Houses to accommodate 308,000 birds (each shed to accommodate up to 51,300 birds) 16,908.81m<sup>2</sup>
- Admin Block 118.86m<sup>2</sup>
- Feed Bins; and
- Ancillary Development\*

\* Drains, Attenuation Pond, subterranean dirty water tanks, hardstanding – as per Site Layout Drawing DRAWING NO: CED-LAY2

*Officers Note: Maximum capacity of chickens per shed is as per the submitted ammonia report; 48,913. The previously referenced January 20<sup>th</sup> 2022, has been superseded by various addendums to the ES in line with operational requirements (industry standard stocking levels)*

### **3. The Principle of Development**

3.1 The NPPF sets out the primary focus for planning practice with the aim of achieving sustainable development. This involves consideration of the three overarching objectives of social, economic and environmental factors in determining planning applications.

3.2 As an agricultural expansion proposal, this application is for an economic development, the principle of which is supported, in general, by paragraphs 81 and 84 which state:

*“Planning...decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.” (para 80)*

*Planning...decisions should enable:*

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses; (para 83)*

3.3 This positive emphasis must, however, be balanced with the concurrent objectives of supporting the health, social and cultural wellbeing of local communities and the need to protect and enhance the natural, built, and historic environment.

3.4 Saved policies, CS2, CS5, CL15 & CL17 of the Development Plan reflect the objectives of the NPPF as noted above, supporting appropriate agricultural and economic development subject to all material considerations. Policies STRAD 1 and STRAD13 of the NDP also echo this objective. Neighbourhood Plan policy STRAD 1 requires developments to be focused within the Settlement Boundary, and the proposal is a departure from this limb of the policy, the proposal nonetheless complies with the later limb for the provision of commercial premises in compliance with STRAD 13. The main issues for consideration include highway safety, landscape impact, heritage, residential amenity, pollution and other amenity impacts, flood risk and drainage and ecology. Subject to compliance with the detailed requirements of these policies, the proposal is supportable in principle.

3.5 Having regard to the scale, nature and location of the proposal, where there is a nearby and existing poultry production operations (Ebdens farm situated less than a 1 mile away to the south-east of the site), it is also appropriate to consider the cumulative impact of the proposal. Consideration has been given to the cumulative impacts arising from the proposal in context with existing and permitted livestock operations



in the northern part of the Mid Suffolk District including the practical supply chain impacts of these operations. Each of these issues is discussed in the following sections of this report.

#### **4. Highway Safety**

4.1 The majority of objections from local residents and parish councils include concerns relating to the impact of traffic movements to and from the site, particularly HGVs, on highway safety including pedestrians, residents, and other road users.

4.2 Policy CL15 addresses livestock buildings and related development and provides that:

*“Proposals for livestock buildings and associated structures, such as slurry tanks and lagoons will not be permitted where they significantly intrude into the landscape, materially injure residential amenity, where the local road system cannot accommodate the flow of traffic generated by the proposal, or where appropriate measures are not included for the containment and disposal of effluent.”*

4.3 Local Plan policy CL17 similarly addresses road safety and supports farm diversification proposals providing:

*“There is no excessive traffic generation or adverse effect on the free flow and safety of traffic”*

4.4 Policy T10 requires consideration of the following:

*“- The provision of safe access to and egress from the site*

*- the suitability of existing roads giving access to the development, in terms of the safe and free flow of traffic and pedestrian safety;*

*- whether the amount and type of traffic generated by the proposal will be acceptable in relation to the capacity of the road network in the locality of the site;*

*- the provision of adequate space for the parking and turning of cars and service vehicles within the curtilage of the site;*

*- whether the needs of pedestrians and cyclists have been met, particularly in the design and layout of new housing and industrial areas. Cycle routes and cycle priority measures will be encouraged in new development.”*

4.5 Neighbourhood Plan Policy STRAD 13 similarly requires:

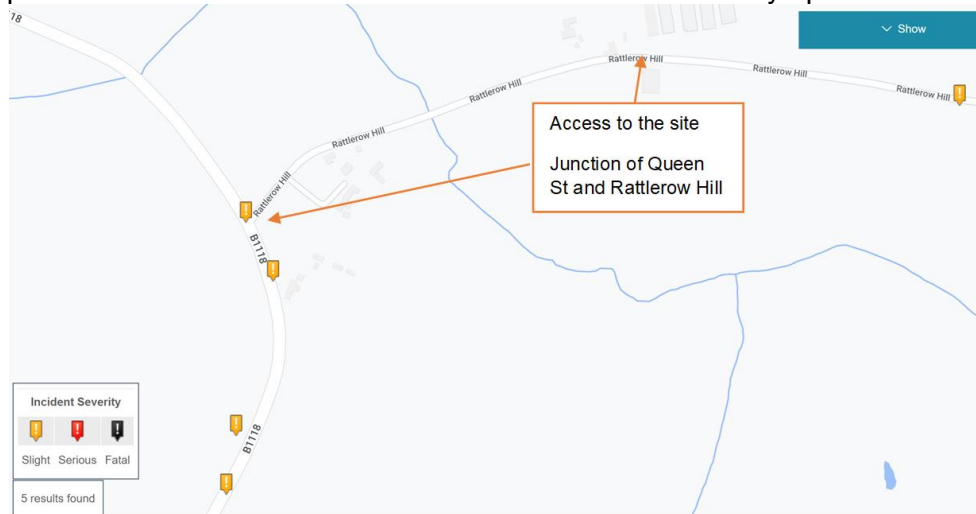
*“the activities to be undertaken on the premises will not result in significant increase in heavy goods vehicular traffic on the roads in the vicinity of the premises or elsewhere in and around the parish.”*

4.6 The NPPF states:

*“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.” (para 111)*

4.7 The proposed development will make use of an existing access (Rattlerow Hill) serving the farm complex. Rattlerow Hill is a single carriageway which is a classified road (C514) which runs on an east to west alignment between the junction with the B1118 and Stradbroke Road. It is subject to the national

speed limit which for a single rural road is 60mph. It is unlit and there are soft grass verges. It has been provided that the current access from onto Rattlerow Hill, and its junction with B1118, has been in use for a number of years without any fatal incidents. The data available on Governments Crashmap website confirms this, which shows just 2no. 'slight' vehicular accidents in the vicinity of the existing access in the 22-year data period from 1999 to 2020 inclusive. Neither are immediately upon the site access.



A. Crashmap data

4.8 The application documents include a transport assessment (TA) produced by The Transportation Consultancy Ltd (ttc) which describes the anticipated traffic and highways impacts of the proposal. The report calculates a total (which includes Bales, Nest Equipment, Eggs, Gas Tanker, General Waste, Hook Loader, Feed, Dead Hook Loader, Moffett, Birds Out, Muck, Cleaning Equipment Tractor, Wash Water, Fogging and Staff) of 258 vehicle trips, which will be generated per flock cycle (over a 7-week period) the maximum trip generation would occur every 6th week in the cycle, where 82 vehicle movements would be generated over a 7-day period. In regard to a daily traffic generation, the first day of the 6th week period would generate 22 vehicle movements throughout the course of the day, which result in a maximum of 44 two-way vehicle trips throughout the flock cycle. The majority of traffic generated through the remaining flock cycle is low, the following highest daily traffic generation occurs on 2nd day of the 5th week where 34 two-way vehicle trips are generated. The first four weeks of the flock cycle generate 10 and 12 two-way vehicle movements respectively.

4.9 The peak traffic generated by the proposed will be a maximum of 44 vehicle movements over the course of a day every 7 weeks at various times during the day. As a comparison the daily and current traffic flows along Rattlerow Hill have been recorded as 926 vehicle and the maximum vehicles movements would therefore equate to an increase of 4.7% on total daily traffic levels, this is not a significant increase.

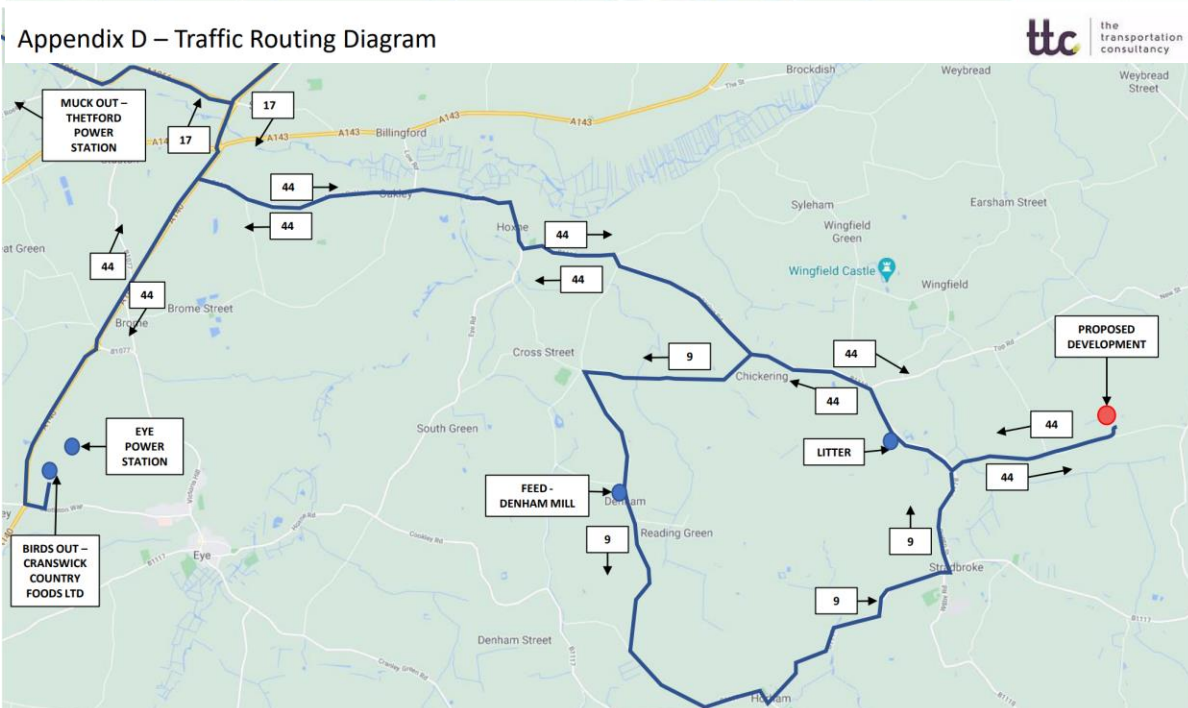
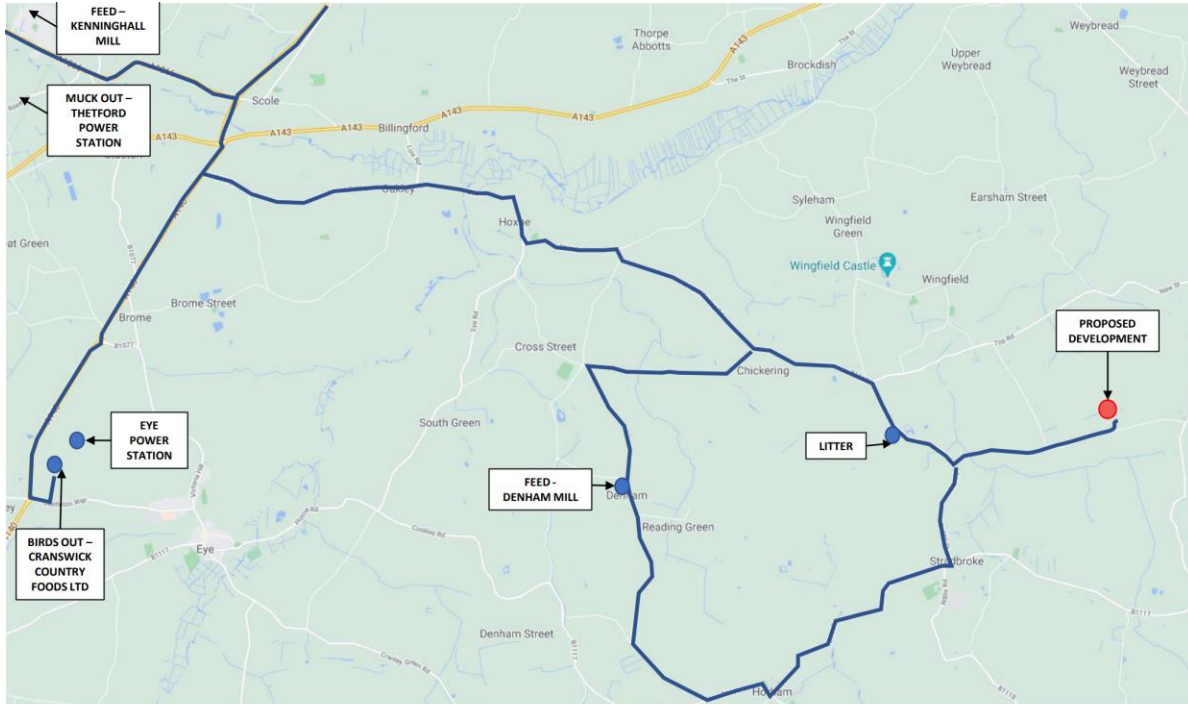
4.10 The applicant has provided that all traffic associated with the poultry farm will route to site from the wider transport network via the existing Fennings Farm vehicle access onto Rattlerow Hill.

4.11 Operational routes and their destinations are outlined below;

- Feed – Denham Mill (30%) and Kenninghall Mill (70%)
- Litter Supplier – Chapman Quality Bedding (Near Rattlerow Farms)
- Muck – Thetford Power Station & Eye Airfield Industrial Estate Power Station
- Birds Out – Cranswick Country Foods Ltd, Eye Airfield Industrial Estate

4.12 Suffolk County Council Highways have considered the estimated increase and likely concentration of traffic movements over the growing cycle and have advised that, whilst in comparison to the existing operation there will be an increase of traffic for the site itself there is not considered to be a severe impact

on the highway network. They have also considered the impact of HGV movements through the local settlements, also the concerns raised by local residents. The SCC Highways Officer has advised that the number and timing of movements from this proposal is such that does not justify the refusal of planning permission on transport grounds. Conditions are recommended to secure a construction management plan, appropriate visibility for the amended access works and a transport plan to agree appropriate HGV routing for the operation, also a Deliveries Management Plan has been recommended. (Please note below illustrations Appendix D which demonstrates the routes and number of HGV movements to and from the site over the 7-week cycle.)



Appendix D – Traffic Routing Diagram - Maximum Daily Traffic over 7-week Flock Cycle



4.13 SCC Highways do not advise that the estimated traffic generation is excessive or there would be any unacceptable impact on the safety of pedestrians and free flow of traffic. Although they have identified that there are narrow sections on Rattlerow Hill (bridge and section close to the application site access), given the forecast additional HGV trips and existing traffic flows, they have withdrawn their objection in this regard. They have noted the impact upon the B1118 in Stradbroke however as this forms part of the Suffolk Lorry Route network and not all of the (modest number of) HGV journeys involve this route, similarly they have accepted the proposal.

4.14 This position differs from that expressed by parish councils and some local residents as summarised above. Amongst other matters, attention has been drawn to the narrow width of parts of the network, to the absence of footpaths, to the incidence on the roads and junctions with limited visibility. Concerns are particularly felt at the section where B1118 Queen Street meets Rattlerow Hill (below illustration), where the existing circumstance of HGV and other traffic movements on the local road network is considered to be harmful to the safety and amenity of local residents. It is felt that this proposal would further exacerbate the harm experienced by these communities. Above (A. Crashmap) is the Crashmap extract which demonstrates all incidents (5 in total) in the past 10 years, all of which have been slight.

4.15 It is also relevant to have regard to the context in which this proposal is being considered, that being a predominantly rural area where the local economy is characterised by agricultural operations.

4.16 Regard also has been had to the cumulative impact of the proposed development on highway safety in the context of the existing circumstances of the area and together with existing and permitted livestock operations in the northern part of the Mid Suffolk District including the practical supply chain impacts of these operations in terms of vehicle movements. It is certainly the case that the road network in parts of the system is of insufficient width to allow two vehicles to pass, especially if one or both are an HGV. However, by the standard of traditional rural roads, there are reasonable levels of forward visibility, with straight stretches, and a relatively open landscape. Where narrow bends occur, they are of limited extent, and the nature of the road tends to encourage caution in all circumstances. As noted previously there are no record of fatal incidents in the past 10 years. Additionally, limited and dispersed settlement in the vicinity, would restrict both the number of pedestrians, and the likelihood of parked cars and vehicles emerging from side turnings.

4.17 In considering all of the above it is necessary to determine whether the highway impact is unacceptable, or the residual cumulative impacts severe. SCC Highways do not conclude so on either count. The matter has previously been considered at appeal in which Inspectors have commented that:

*'the term 'severe' sets a high bar for intervention via the planning system in traffic effects arising from development' and that 'the critical elements in assessing whether the impact was severe were firstly, increase in the number of vehicles likely to be generated by the proposed development in relation to the capacity of the road to accommodate such an increase, both in terms of free-flow of traffic and highway safety, [and]...the ability for pedestrians to cross the main road conveniently and safely and the ease of vehicles to gain access to the main road from side streets and access points'.*

4.18 In this case there is no indication that the increase in the number of vehicles generated by the development would exceed the capacity of the local road network which is, generally, lightly trafficked at most times. Further, there is no indication that there will be additional and significant wait times or other congestion would result from the traffic generation of the proposal. In terms of pedestrian safety, it is considered that drivers would be adequately aware of the likelihood of pedestrians when travelling through the area . such that the impact on pedestrian safety is not considered to be significantly different to the existing circumstance.

4.19 In assessing the overall highway safety impacts of the proposal, in terms of the NPPF and development plan considerations, it is concluded that the proposal would not result in excessive traffic generation, would not be unacceptable in relation to the capacity of the local road network, would not result in an unacceptable impact on highway safety or a severe impact on the highway network when considered cumulatively with other development in the area.

4.20 Further, development can be adequately controlled such as to secure safe access, parking and turning and vehicle routing for the operation as well as other suitable conditions as recommended by SCC Highways Officer. On this basis the proposal is considered to be acceptable on highway safety grounds and in compliance with policies CL15, T10 and para 111 of the NPPF.

## 5. Landscape, Design & Character impact

5.1 NPPF paragraph 130(c) states that planning decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. The NPPF states that local authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

5.2 Local Plan Policy GP1 calls for proposals to, amongst other matters, maintain and enhance the character and appearance of their surroundings. Policy CS5 of the Core Strategy seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the district's most important components and encouraging development that is consistent with conserving its overall character.

5.1 The prevailing character of the surrounding landscape is that of generally open, rolling, arable land interspersed with residential and agricultural buildings. Fennings Farm is an existing and established poultry production farm that has been operating for many years and has become part of the landscape character in this part of the countryside.

5.2 The site is screened from public views by the topography of the surrounding landscape as well as existing built development, bunding and some mature vegetation.

5.3 The scale, design and materials of the proposed buildings are typical of modern agricultural developments, similar to those that exist in the wider landscape and a more modern version, but similar style, to the existing poultry shed buildings at Fennings Farm. Each building will have windows based on 3% floor area to latest RSPCA standards. The pitch of the roof will be 12.5 degrees, the height to the eaves will be 2.2m, and the height to the ridge 5.1m. Lighting will consist of personnel lights above doorways for health and safety reasons and directional LED floodlighting above vehicle doorways. No other lighting is proposed.

5.4 The application documents include illustration which demonstrates a strip of 240x40sqm landscaping that has been recently planted(B). This combined with the presence of other mature vegetation surrounding the site results in a reduced impact upon the landscape character. Additionally, the presence of poultry production units is not out of keeping in this part of the countryside.

5.5 Modern agricultural buildings such as those proposed here are a common feature within the rural working landscape of this part of the district as noted above and the location of the 6 units in close proximity to the existing 9 units will be observed as one operations . There is not considered to be an unacceptable cumulative visual impact arising from this proposal in context with other development in the landscape. The development conforms with the criteria of GP01 and CL14 of the Local Plan.



5.6 Overall there is not considered to be any unacceptable visual impact subject to conditions to secure appropriate landscaping. (Recent tree planting has been demonstrated and can be observed in below illustration)

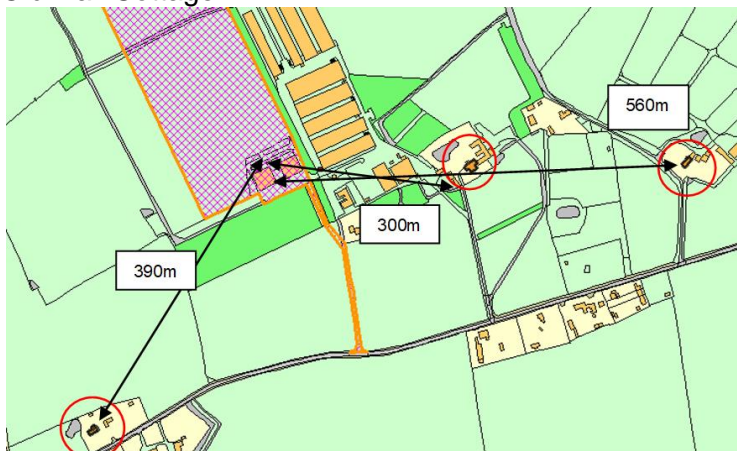


*B. Present landscaping*

**6. Heritage**

6.1 Section 66 (1) of the Planning (LCBA) Act 1990 requires local authorities to give special attention to the desirability of preserving or enhancing the character or appearance of listed buildings, including setting.. In addition, paragraph 199 makes clear that ‘...When considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset’s conservation...’

6.2 There are no heritage assets within the site itself but there are a number of listed buildings within the wider landscape, including Grade II listed Fennings Farmhouse, formerly White House Farmhouse, North Lane Farmhouse and Old Hall Cottage.



*C. Distances to nearest GII listed assets*

6.3 The BMSDC Heritage Officer advises that, having regard to the character of the landscape, the site falls within the setting of these listed buildings. They agree with the findings of the submitted Heritage Impact Assessment in terms of visual impact of the proposal which concludes that the development would result in less than substantial harm to the significance of the Grade II Listed Old Hall Cottage (List UID: 1182816) and that this harm would be at the lower end of the scale. This impact is due to the visibility of the proposed sheds, within the wider setting of the Listed cottage. However, they assert that the impact on a heritage assets setting cannot be limited to views alone. Other environmental factors, such as noise, increased traffic, vibrations, dust, light, etc, all will have an impact on the setting of a heritage asset.

6.4 The Noise Impact Assessment was carried out by Matrix Acoustic Design Consultants and while their assessment does not specifically target the nearby heritage assets, in general they can be considered to be included within the areas assessed. The noise impact assessment states that the majority of transport movements will occur during the working day (07:00 – 20:00hrs), presumably with a minority of further movements also occurring outside of the working day hours. It also states that “the cumulative noise emissions from roof extract fans with the addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels.” As a result there will be a low level of negative impact, due to noise and traffic, particularly on heritage assets closest to the development site.

6.5 An assessment of the impact of odours was carried out by Redmore Environmental. The assessment area covered included the majority of the designated and non-designated heritage assets and the subsequent report concludes that the “predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.” As a result of these findings, there is a negligible impact on the setting and significance of the heritage assets, from the odours associated with the operation of the development.

6.6 The scheme would result in a low level of less than substantial level of harm to the nearby designated heritage assets, due to the negative effect on environmental factors on their setting, along with a low level of less than substantial level of harm resulting from the detrimental visual impact specifically on the Grade II Listed Old Hall Cottage. Therefore and based on the above assessment, the development would cause a low level of less than substantial harm to the nearby heritage assets, which would need to be weighed against the public benefits of the proposal, in accordance with Paragraph 202 of the NPPF.

6.7 Paragraph 202 of the NPPF requires that a finding of less than substantial harm must be weighed against the public benefits of the proposed development. The proposal would create an expansion to an existing and established business, which would bring tangible economic benefits across the district, which are considered to outweigh the low level of less than substantial harm as identified by the Heritage Officer. The proposal would be in line with Local Development Plan policy HB1, and paragraph 199 & 202 of the NPPF.

6.8 The SCC Archaeology officer advises that there is high potential for the site to have archaeological assets due to its location and that finds have been recorded on adjacent land. SCC has raised no objection to the proposal and recommends conditions to secure an appropriate scheme of archaeological investigation and recording for the site.

## 7. Residential and other amenity impacts

7.1 The nature of the operation is such that it has the potential to give rise to residential amenity impacts in terms of noise, smell, disturbance, etc. Whilst the site is located in the countryside it is in fairly close proximity to the northern part of Stradbroke along Queen St such that disturbance from associated traffic

movements has the potential to affect these residents. There are also number of more isolated properties closer to the site.

7.2 Noise: The most likely sources of noise impact from this type of operation is associated with vehicle movements, including the use of forklifts and the use of extraction fans used for ventilation of the buildings.

7.3 The application documents include a noise impact assessment which established the background noise levels at the nearest dwellings to the site and compared this to the levels of noise expected to be generated by the operation of the proposed development. The cumulative noise impact of the existing and proposed additional poultry units has been established to be low.

7.4 The MSDC Environmental Health Officer advises that the scale and nature of the proposal is regulated by the Environment Agency environmental permitting scheme, such that noise impacts are controlled through that process. The Environment Agency have made no comments regarding the noise impacts of the proposal. On the basis of this advice and the findings of the noise impact assessment the proposal is not considered to have an unacceptable noise impact.

7.5 Odour: As an agricultural operation the proposed development has the potential to emit odours that arise from the keeping of live animals. The submitted Odour Assessment has identified that there is the potential for odour releases from the ridge mounted fans serving the proposed poultry sheds during normal operation (such fans also serve the existing poultry sheds). The operation would be subject to control through the Environmental Permitting regime administered by the Environment Agency which includes consideration of airborne pollutants. The NPPF advises that, whilst planning decisions should not seek to duplicate controls that exist in other regimes and those regimes must be assumed to be effective, it is necessary for the planning process to consider whether the proposed use of the land is appropriate and that includes consideration of the impact of any odours on the amenity of people living and working in the locality.

7.6 In assessing the impact of odour from the proposal on the amenity of the locality regard has been had to Guidance on the assessment of odour for planning version 1.1 (IAQM, 2018).

7.7 The impact of odour from the development is assessed in context with the existing odour impacts from other operations (Ebdens Farm is located approximately 750m south-east of Fennings Farm) in the area on the health and living conditions of the community.

7.8 The application documents include an odour and ammonia assessment for the proposal. These documents explain that predicted odour concentrations were below the relevant EA odour benchmark level at all receptor locations for all modelling years. The significance of predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.

7.9 The Environment Agency has withdrawn their earlier objection to the proposal however they have noted that the odour emissions from the gable end fans are not included in the Odour Modelling and Assessment, that considered in the assessment of this application. They have recommended that they are used during hot weather (depending on the age of the broilers) and that these are the days when residents tend to either be outside in their gardens or have house windows open.

7.10 It is noteworthy that para. 3.2.2 of the submitted Odour report already provides that although the poultry sheds include gable end fans, these will only activate when the outside temperature exceeds 28 C. (normally occurring in months of July and early August). As such, use of the gable end fans is not considered to represent normal operation. i.e., in terms of the potential for significant effects arising from gable end fan usage. Additional information was provided by the applicant on 9<sup>th</sup> Sep 2022, and included



that cooling systems will be installed in the proposed sheds. These will provide additional control of internal temperatures during hot weather and limit the requirement for use of the gable end fans in extreme conditions. On similar sites where comparable cooling systems have been installed, external temperatures have reached 41°C and appropriate conditions have been maintained within buildings without the requirement for additional ventilation. Information provided by the Applicant indicates that for the existing buildings on site which do not include cooling systems, gable end fans are utilised for approximately 10-hours on 10-days per year during hot weather. This represents only 1.14% of the total number of hours in a year and due to the very limited period, it is considered unlikely that inclusion of emissions from gable end fans within the model would significantly affect predicted 98th %ile of 1-hour mean odour concentrations at any of the sensitive locations included in the assessment.

This is an acceptable outcome and supportable as a result.

7.11 Lighting: Given the countryside location and policy requirement of preserving the countryside for its sake, the external lighting should have a minimum impact on the environment and should reduce energy consumption, keeping night-time skies dark and reducing glare.

7.12 The proposal does naturally require some external lighting to ensure the safety of people and vehicles on site. Lighting for the proposed development will consist of personnel lights above doorways for health and safety reasons and directional LED floodlighting above vehicle doorways. No other lighting is proposed. As a result, the proposal has been designed to ensure energy efficiency and minimise light-spill impacts on the surrounding countryside, there would not be any unacceptable impact on either residential amenity of the appearance of the surrounding landscape in terms of light pollution.

7.13 Disturbance: Transportation and HGV traffic through residential areas have the potential to impact on residential amenity. As described above in terms of highway safety, it is relevant to consider the context of this development where there is an existing level of disturbance experienced by residents arising from the mix of uses and range of other agricultural operations in the locality, together with the recent increase in delivered goods and services.

7.14 In assessing the disturbance impacts of this proposal, it is therefore necessary to consider the difference the operation of the development would have on local residents. The site itself is relatively isolated from residential properties such that on-site operations are not likely to result in significant unacceptable disturbance impacts. The associated vehicle movements from the operation, most likely routed through Stradbroke, would be experienced in context with the existing vehicle movements in the local area and as described above, are not considered to be so significant as to be unacceptable.

## 8. Flood risk and drainage

8.1 The application site lies entirely within Flood Zone 1 as identified in the Environmental Agency's Flood Map. Flood Zone 1: Fluvial and Tidal Flood Zone 1 has less than 1 in 1000 chance of flooding at a location in any one given year (i.e., less than 0.1% annual exceedance probability (AEP) of flooding).

8.2 Application documents include a flood risk assessment that describes the flood risks to the development and from the development on the site and the surrounding area. It also includes recommendations for mitigation of these impacts. The assessment has shown that the proposed development is located in Fluvial and Tidal Flood Zone 1 and of low risk of surface water, groundwater, or reservoir flooding. The report also includes information regarding the surface water runoff, which will discharge into a drainage system, designed to contain up to and including the 1 in 100-year rainfall event. To prevent pollution to the surface waters, underlying geology, and groundwater an appropriate level of water treatment stages has been incorporated into the design. To reduce the risk of flooding due to the failure of the surface water drainage system over its lifespan, a maintenance scheme for the drainage can be added as a condition.

8.3 The SCC Floods Officer raised some initial queries and requested additional information which has since been received. He now advises approval subject to conditions to mitigate the flood risk impacts of the development.

8.4 On the basis of the advice from the SCC and subject to the conditions recommended there are not considered to be unacceptable flood risk or drainage impacts arising from the development.

## 9. Ecology

9.1 The application site is part of Chippenhall Green Site of Special Scientific Interest (SSSI), which means that there is potential for ecology impacts. The application documents include an ecological assessment that describes the value of the site in terms of protected species and habitats. It concludes that the development would not have significant impacts and sets out recommendations for compensation and enhancements that will enable the development to be carried out whilst secure a biodiversity net gain, in accordance with the NPPF.

9.2 The council's ecology adviser has reviewed the assessment and proposed mitigation measures submitted with the application and advises that the updated assessment demonstrates that there is unlikely to be any impact upon the Chippenhall Green Site of Special Scientific Interest (SSSI) from increased ammonia. This is because the report appears to be completed appropriately and the predicted impacts will be below 1% in-combination assessment threshold. Matter of air quality has already been assessed by the district's EH Officer and no objection has been raised in this regard.

9.3 On the basis of this specialist advice and subject to conditions the development is considered to have no unacceptable impact on ecology and the council has discharged its statutory duties in this regard.

## 10. Other matters

10.1 The proposal will make a contribution to supporting the rural economy by aiding farm diversification and creating / supporting local employment.

10.2 The size of the development triggers the requirements of Core Strategy policy CS3 to secure the use of renewable energy to meet some of the development's energy needs. Whilst there are no specific details in the application submission this can be controlled by condition.

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# **PART FOUR – CONCLUSION**

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## **11. Planning Balance and Conclusion**

11.1. The principle of appropriate agricultural diversification development is generally supported by the NPPF and the Development Plan providing the impacts of such development are acceptable or can be made so by planning conditions. Officers recognise the changing demand in the poultry market and the role of operations such as is proposed to the food production industry and the ongoing viability of the wider district and regional economy.

11.2. The impacts of the proposed development on the surrounding area and communities have been considered, taking account of specialist advice. The potential for harmful impacts in terms of material issues arising from the development can be removed and / or mitigated by appropriate conditions.

11.3. In addition to matters concerning traffic generation, dealt with above, other matters such as potential impact of factors including dirty water disposal, dead birds/fallen stock, odours, flies, and noise can be dealt with by way of suitable conditions. The views of third parties are noted, but the evidence submitted in support of them is not sufficient to indicate that the content or conclusions of the submitted documents are incorrect. The development would not have an unacceptable environmental impact, provided the necessary mitigating measures are carried out.

11.4 The development is in accordance with Stradbroke Neighbourhood Plan, local plan policies, and the guidance contained within the NPPF. The impacts of the proposed development on the surrounding area and communities have been considered, taking account of specialist advice. As such the application is considered supportable.

## **RECOMMENDATION**

That authority be delegated to the Chief Planning Officer to Grant planning permission:

**(1) That the Chief Planning Officer be authorised to GRANT Planning Permission subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:**

- Approved Plans (Plans submitted that form this application)
- Commencement timescale
- Recommended conditions by SCC Highways:
  - All HGV delivery traffic movements
  - Loading, unloading, manoeuvring, parking & EV Charging points
  - Provision visibility splays, access,
  - Construction Management Plan
- Recommended conditions by Archaeologist:
  - Investigation and post investigation assessment
  - Implementation of a programme of archaeological work
- Recommended conditions by Ecologist
  - Action in accordance with the Ecological Impact Assessment
- Landscaping conditions
- Recommended condition by LLFA
  - surface water drainage in accordance with FRA
- Energy efficiency condition
- Agreement of materials

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

- Proactive working statement
- Floods Informatives
- SCC Highways notes
- Support for sustainable development principles
- Anglian Water advisory notes
- Fire advisory note

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Application No: DC/21/06824

Location: Land at Fennings Farm, Pixey Green, Stradbroke, Suffolk

		Page No.
Appendix 1: Call In Request	No	
Appendix 2: Details of Previous Decision	N/a	
Appendix 3: Parish Council/s	<i>Stradbroke PC Horham and Athelington Fressingfield PC</i>	
Appendix 4: National Consultee Responses	<i>Historic England Natural England Environment Agency</i>	
Appendix 5: County Council Responses	<i>SCC Archaeology SCC Fire and Rescue SCC Floods management SCC Highways SCC Travel Plan</i>	
Appendix 6: Internal Consultee Responses	<i>Place Services Heritage Waste Management Place Services/Ecology Environmental Health (Noise/Audor/smell/air quality), Environmental Health (Land Contamination Environmental Health (Air Quality)</i>	
Appendix 7: Any other consultee responses	N/A	
Appendix 8: Application Site Location Plan	Yes	



Babergh and Mid Suffolk District Councils



Appendix 9: Application Plans and Docs	Yes	
Appendix 10: Further information	N/a	

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

Mahsa Kavyani



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Babergh and Mid Suffolk District Councils

**DC/21/06824 – Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development (EIA Development). Land at Fennings Farm, Pixey Green, Stradbroke, Suffolk.**

Stradbroke Parish Council notes that since its original response to the consultation on the above application further reports and consultation responses have been uploaded to the planning portal. Although the Parish Council has not been re-consulted on this application, the Parish Council would like to submit this additional statement.

The Parish Council maintains its previous objection and recommendation.

The Parish Council notes that the Built Heritage Consultant for Place Services does not find that the proposed development enhances or preserves the positive element of the setting of the nearby heritage asset, Grade II Listed Old Hall Cottage which is contrary to paras 200 and 206 of the NPPF. The Parish Council also notes that the Consultant believes that the negative impacts of the scheme could not be successfully mitigated.

The Parish Council highlights that a number of the concerns previously raised have not been addressed in the updated reports, namely:

**1. Water**

- a. The covering letter submitted with the updated Environment Statement states the development would not require a new supply, however this does not address the matter as the Water Cycle Study for Babergh and Mid Suffolk states: *“ESW commented that the supply headroom in its Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development”*. The additional reports do not address the increased demand for water in this non-household development.
- b. The applicant’s agent also states that: *“this is before any additional provision via rainwater harvesting”*. The Parish Council can find no reference in the submitted documents to rainwater harvesting. The flood risk assessment prepared in June 2021 by Plandescil identifies on p.18, point 6.6, that surface water runoff from the proposed hardstanding (2.071ha including roofs, yard, and access) will discharge into an attenuation system which will outfall into the ditch on the northern boundary of the site via a flow control. In addition, the report identifies on p.17 that *“rainwater harvesting could be provided, however due to the end use, the re-use of the water is unlikely”*.

**2. Odour**

- a. P.14 of the submitted Odour Assessment notes at point 3.6.5 that the odour impacts during the clear out periods were not represented within the model used to determine whether there would be any impact on the surrounding properties. This includes the odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed.
- b. P.35 of the Transport Assessment shows that the clear out process for the proposed 6 sheds will take place over 2 days, this combined with the days required to clear the existing 9 sheds could mean the highest level of odour emissions could be reached on a considerable number of days in every year, yet has not been modelled. Therefore, given that peak emissions are likely to be significantly higher than at other times it is necessary for the applicant to provide details about

the upper limits of these emissions in order for the impacts of the clear-out process of the sheds to be assessed.

- c. The odour assessment accepts that the clear out process will result in increased odour emissions, therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is therefore not certain that Policy CL17 will not be breached as there is no evidence that there will be no materially detrimental effect on nearby residential amenity. In addition, there is no reference to the scale of odour emissions that may arise over the full rearing cycle or over the different times of the year.
- d. East Suffolk Council commissioned an independent review of an odour impact assessment submitted to support a planning application for 3 poultry units, this review has highlighted flaws in the methodology of that report which the Parish Council feel are also reflected in the methodology used to prepare the odour report submitted in relation to this application.
- e. The applicant's agent has pointed out the responsibility for odour management rests with the Local Planning Authority. Therefore the Parish Council would urge officers to carry out the same rigorous investigations as East Suffolk Council to verify the outcomes of the submitted odour report. Once this has been undertaken the views should be sought of Mid Suffolk's Environmental Protection Officers on the potential detrimental effect on nearby residential amenity of the peak emissions during clear out days and the increased emissions through the growing cycle and the impact these would have over the course of the year.
- f. Odour assessment: on pages 10 & 15, footnotes 12 & 14 reference IPPC SRG 6.02 (Farming) - Odour Management at Intensive Livestock installations, EA, 2003 – this guidance does not contain the information referenced on the pages. Mid Suffolk officers will need to ensure that the correct guidance has been evaluated and referenced.

### **3. Waste (litter and water)**

- a. The agent's covering letter for the environmental statement highlights on p.1, 3<sup>rd</sup> bullet point, that there is a letter of undertaking from the applicant in relation to the muck arising and an upcoming contract with Melton Renewable Energy UK Limited. The attached letter states the following: *"Please accept this letter as confirmation of our intention to send all muck generated from the proposed poultry houses..... for use in the generation of electricity at either Eye or Thetford ...."* The applicant goes on to qualify this statement with another as follows: *"Although the specific destination of the muck remains a commercial decision subject to future contract negotiations ...."*
- b. The statements above from the applicant do not prevent spreading of the waste nearby the site should that become more convenient or economic. Odour and dust impacts from the spreading of the waste are therefore a foreseeable indirect effect of the proposed development in the absence of a condition or planning obligation ensuring that the waste will in fact be delivered to Eye or Thetford Power Stations. Particularly given that the permitting documents previously submitted by the Parish Council show the intention for the disposal of litter is as follows: *"At the end of the rearing periods after chickens have been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel."*



- c. The Parish Council notes from documents submitted to East Suffolk Council that the Environment Agency make explicitly clear that the amenity impacts arising from waste management are to be dealt with by the Local Planning Authority.
- d. The recently submitted documents do not address the issue of disposal of waste water and therefore the Parish Council reiterates the following:
  - i. The Transport Assessment in Table 4.1 on p.14 states that there will be 2 x artic of waste water per cycle (7.5 cycles per annum). Each load carries 30,000 litres (p. 34 Annex E Transport Assessment) giving an annual total of 450,000 litres of waste water.
  - ii. Point 6.18 (p.43) of the Environment Statement states that the waste water from cleaning the units will be taken from site in sealed tankers – the report is silent on the destination of the waste water.
  - iii. As part of the submitted EA permitting documents it is stated that: *“Dirty water spread on land under the control of a separate farming business and a written agreement is in place.”*
  - iv. None of the documentation submitted identifies where the separate farming business is situated and there is no evidence submitted that the waste water would be treated or that the spreading of waste water on land would not have a detrimental environmental impact.

#### 4. Highways

- a. The Parish Council notes the copies of recent correspondence between the applicant’s agent and Suffolk County Council Highways in which the holding objection has been removed.
- b. The Parish Council notes from this correspondence that Suffolk County Council Highways stated the following: *"The impact upon the B1118 in Stradbroke is a greater concern but as this forms part of the Suffolk Lorry Route network and not all of the (modest number of) HGV journeys involve this route, it is something we will have to accept."*
- c. The Parish Council continues to seek reassurance from both Mid Suffolk and Suffolk County Councils that the risk posed to pedestrians of an HGV mounting the only pavement to enable vehicles to pass each other on the B1118 in the village (Queens Street) has been thoroughly and rigorously reviewed as the emails from highways do not show this to be the case. There is no evidence submitted that this application can mitigate the impact on highway safety of the additional vehicle movements on the B1118, which is not in accordance with NPPF paragraph 110.

Submitted by:  
Stradbroke Parish Council  
16 August 2022

**DC/21/06824 – Erection of 6no. poultry houses with associated admin blocks, feed bins and ancillary development (EIA Development). Land at Fennings Farm, Pixey Green, Stradbroke, Suffolk.**

The recommendation in this report is based on a review of the documentation submitted for this application together with documentation submitted to the Environment Agency in support of a revised permit application. The full review of the relevant matters is submitted on pages 2–6, with the environmental permit application documents attached as appendices for reference.

**Recommendation**

Stradbroke Parish Council **OBJECTS** to the planning application and recommends that Mid Suffolk **REFUSES** the application due to concerns regarding the following planning matters:

1. Essex and Suffolk Water and Mid Suffolk published a statement of common ground in September 2020; this document confirms that the water supply headroom for non-household demand has been exhausted in this area. This application is for a water intensive business and yet this matter is not referenced or dealt with in any of the documentation supporting the application.
2. Waste (litter) – there are differing statements made by the applicant and the company which applied for the environmental permit. Recent court cases demonstrate that it is necessary that the treatment of all litter produced at intensive poultry units should be fully and clearly shown in planning applications – this is not the case with this application where only vague statements are made with no supporting evidence; this fails to satisfy the requirements as laid out in the court cases (Squire vs Shropshire and Keating vs East Suffolk).
3. Waste (water) – as above, the application contains a limited statement on the disposal of the waste water and the permit application does not contain sufficient information on which land the water will be spread and this fails to satisfy the requirements of the court cases.
4. Odour - The Odour Assessment does not quantify the peak odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed. The odour assessment accepts that the clear out process will result in increased odour emissions therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is not certain that Policy CL17 will not be breached given there is no evidence that there will be no materially detrimental effect on nearby residential amenity.
5. Ammonia - The cumulative and in combination effects of the 6 units in this application, the existing units on the site and Ebdens Farm (only 1km away) has not been modelled, assessed or reviewed. In addition, the full capacity of this application site has not been assessed. It is not clear whether the updated guidance from Natural England published September 2021 has been applied.
6. Stradbroke Neighbourhood Plan – as this is referenced as a site bringing employment, the increased vehicle movements is contra to Policy STRAD13.
7. Highways – It is not clear from the Transport Assessment how the unacceptable impact on highway safety of additional HGVs travelling along the narrow point on Queens Street can be mitigated, this is contrary to NPPF para. 110 and Policies CL15 and CL17. NPPF para. 111 states that applications can be refused if there is an unacceptable impact on highway safety.
8. The correct IPPC guidance on managing units over 40,000 has not been referenced (see point 4.8 below) and it is not clear what impact this would have on the areas mentioned above, further investigation by the parish council is ongoing and the council may submit additional comments once completed.

## 1. Water

- 1.1 As part of the Joint Local Plan review process Mid Suffolk District Council and Essex and Suffolk Water published a statement of common ground which clarified the following:

*“Water supply.*

*Through the production of a Water Cycle Study for Babergh and Mid Suffolk, ESW commented that the supply headroom in its Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development.*

*Outcomes*

*A meeting was held on 22nd September 2020, where ESW confirmed they could meet expected household growth in the Water Resource Management period (2020 to 2025). It was also confirmed that ESW expect to be able to support the relevant proposed overall growth in the Joint Local Plan lifetime through future investment plans. ESW is however unable to provide water in the current Water Resource Management Plan period for new non-domestic processing activities. If uses of this kind were to come forward for development, then the water required would need to be planned for in the next Water Resource Management Plan period (Periodic Review 2024 known as PR24). This would also require investment in infrastructure or water transfer which would unlikely be operational until 2027. In the meantime, and where appropriate, businesses requiring additional non-domestic supplies should consider other options including, but not limited to, opportunities for water recycling.*

*Additional investment can be made by ESW through the next Water Resources Management Plan to further support the planned growth within the Hartismere WRZ.”*

- 1.2 Intensive Poultry Units are high users of water in terms of drinking water (for the birds) and poultry shed cleaning. On average each bird will consume 1.6ltr of water for every 1kg of feed; this added to the cleaning water required would mean that the 308,000 birds per cycle reared in the 6 units in this application would require water usage of between 11.5 and 15.2 million litres of water per year depending on the amount of feed consumed.
- 1.3 There is no reference to the matter of non-domestic water usage and how this non-domestic usage is to be mitigated in light of the statement from Essex and Suffolk Water regarding the limited supply in the Hartismere Water Resource Zone, in which this proposed development is sited.
- 1.4 The matter of water supply was noted at the recent Joint Local Plan hearings by Mid Suffolk officers as being a major issue for future non-domestic applications, such as this one, that come forward in an affected area, which this is.

## 2. Waste (litter)

- 2.1 P.43-44 of the Environmental Statement covers the treatment of the poultry litter. 6.20 states that the litter will be treated in accordance with the Environment Agency Permit.
- 2.2 Point 6.21 on p.44 of the Environmental Statement states the litter will go to local power stations, eg Eye or Thetford Power Station, then continues that a contract at this is stage is for the majority of the litter to go to Eye Power Station.
- 2.3 Crown Chicken (part of Cranswick) not the applicant has applied for the environment agency permit and as part of this application Crown submitted an odour management plan stating that most of the litter is used for power generation. Crown also stated that *“any which is land-spread will be under the control of a separate farming business and a written contract is in place”*, however the application fails to identify where this third party land is situated. In response to a request for further information from the Environment Agency, Crown stated the following: *“At the end of the rearing periods after chickens have*

*been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel."*

- 2.4 The Squire vs Shropshire Council court of appeal case made clear the importance of assessing the treatment of waste when determining the impacts of a poultry development. This appeal decision is supported by the case of Keating vs East Suffolk Council where a planning decision was quashed as the council misinterpreted the Squire case and failed to adequately consider the direct and indirect environmental effects of the waste. Given the statements from the applicant and the company who will be operating the units concerning poultry waste disposal, it is not clear from the information available that this application fully complies with the outcome of the Squire case.
- 2.5 The statements from both the applicant and the operator do not prevent spreading of manure nearby the site should that become more convenient or economic. Odour and dust impacts from the spreading of manure are therefore a foreseeable indirect effect of the proposed development in the absence of a condition or planning obligation ensuring that the waste will in fact be delivered to Eye Power Station.
- 2.6 During the examination of the Joint Local Plan, officers from Suffolk County Council reiterated that it is the Local Planning Authority's responsibility to ensure that all the waste from intensive poultry units is properly managed and dealt with. This includes ensuring capacity is available wherever waste is disposed.

### **3. Waste (Water)**

- 3.1 The Transport Assessment in Table 4.1 on p.14 states that there will be 2 x artic of waste water per cycle (7.5 cycles per annum). Each load carries 30,000 litres (p. 34 Annex E Transport Assessment) giving an annual total of 450,000 litres of waste water.
- 3.2 Point 6.18 (p.43) of the Environment Statement states that the waste water from cleaning the units will be taken from site in sealed tankers – the report is silent on the destination of the waste water.
- 3.3 The operator of the site (not the applicant) has obtained a permit from the environment agency. As part of the submitted documents Crown stated that: *"Dirty water spread on land under the control of a separate farming business and a written agreement is in place."*
- 3.4 None of the documentation submitted identifies where the separate farming business is situated and there is no evidence submitted that the waste water would be treated or that the spreading of waste water on land would not have a detrimental environmental impact.
- 3.5 During the examination of the Joint Local Plan, officers from Suffolk County Council reiterated that it is the Local Planning Authority's responsibility to ensure that all the waste from intensive poultry units is properly managed and dealt with. This includes ensuring capacity is available wherever waste is disposed.

### **4. Odour**

- 4.1 The response from the environmental health team at MSDC appears to show that the team has not reviewed the Odour Assessment report submitted in support of the application.
- 4.2 The Planning Statement at point 1.8 (p.3-4) and point 3.5 (p.9) states that the reasoning for the development is that the additional 6 sheds will take the farm to full capacity.
- 4.3 The Odour Assessment models for 538,500 birds and not the maximum capacity of the site (including the existing 9 units) which is shown as 570,000 (Planning Statement – appendix Environment Agency notice of variation p.2).

- 4.4 P.14 of the submitted Odour Assessment notes at point 3.6.5 that the odour impacts during the clean out periods were not represented within the model used to determine whether there would be any impact on the surrounding properties. This includes the odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed.
- 4.5 P.35 of the Transport Assessment shows that the clear out process for the proposed 6 sheds will take place over 2 days, this combined with the days required to clear the existing 9 sheds could mean the highest level of odour emissions could be reached on a considerable number of days in every year, yet has not been modelled. Therefore, given that peak emissions are likely to be significantly higher than at other times it is necessary for the applicant to provide details about the upper limits of these emissions in order for the impacts of the clear-out process of the sheds to be assessed.
- 4.6 The odour assessment accepts that the clear out process will result in increased odour emissions, therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is therefore not certain that Policy CL17 will not be breached as there is no evidence that there will be no materially detrimental effect on nearby residential amenity.
- 4.7 The EA permit for the nearby Ebdens Farm intensive poultry units shows the capacity is 252,000 birds. This would mean a combined total number of birds within 1km of 822,000 birds x 7.5 cycles per annum = 6,165,000 birds per annum. However, the cumulative and in combination effects of these two sites has not been modelled, assessed or reviewed.
- 4.8 Odour assessment: on pages 10 & 17, footnotes 12 & 14 reference IPPC SRG 6.02 (Farming) - Odour Management at Intensive Livestock installations, EA, 2003 – this guidance is for poultry units **up to** 40,000 birds therefore is not relevant to this application. Mid Suffolk officers will need to ensure that the correct guidance has been evaluated and referenced.

## **5. Ammonia**

- 5.1 The cumulative and in combination effects of the 6 units in this application, the existing units on the site and Ebdens Farm (only 1km away) has not been modelled, assessed or reviewed. In addition, point 1.2.3 page 1 notes that the capacity modelled for this application is 48,913 per shed, not the full capacity of each shed which would be 51,300 birds per shed, per cycle.
- 5.2 The guidance from Natural England was updated in September 2021 with a 1% in-combination threshold now being applied, it is not clear that this has been taken into account in the documentation submitted.

## **6. Stradbroke Neighbourhood Plan**

- 6.1 The applicant states that the development would result in employment for two full time managers and part time staff (Planning Statement p.13 point 5.5). Section 8 (p.38) of the Neighbourhood Plan concentrates on the economy of the village and paragraph (d) identifies that new employment should not encroach into the open countryside. The development is proposed in open countryside; however this area of countryside is adjacent to existing poultry units.
- 6.2 The Planning Statement at point 5.31 (p.17) references the Neighbourhood Plan and states that the proposal complies with the required criteria within Policy STRAD13. Policy STRAD13 states at bullet point 4 that the activities should not result in significant increase in heavy goods vehicular traffic on the roads in the vicinity of the premises or elsewhere in and around the parish. The applicant has submitted evidence that the proposed development will result in an additional 3870 vehicle movements per annum with a particular increase in HGVs on week 6 of each cycle with 7.5 cycles a year (see Transport Assessment p.14 table 4.1) this represents a significant increase on the present situation on the roads in the vicinity of the proposed development site and therefore does not satisfy the criteria of Policy STRAD13.

## 7. Highways

7.1 NPPF paragraph 110 states that when assessing sites put forward for development it should be ensured that “(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), **or on highway safety**, can be cost effectively mitigated to an acceptable degree.”

7.2 The submitted Transport Assessment states at the 6<sup>th</sup> paragraph to section 4.6 on page 16 that the “... *the B1118 is a two-way carriageway with clear road markings and therefore **two HGV can pass each other safely***”.

7.3 The Environmental Statement at point 5.41 contains a caveat that the ratio of feed from Denham and Kenningall Mills is not guaranteed, therefore this could mean that all HGVs carrying feed could travel from Denham through the village of Stradbroke on the B1118. The additional HGVs carrying feed that will need to pass down Queens Street every year pose a **significant impact on highway safety**. The photos below show that the section of the B1118 (Queens Street) which passes through the centre of the village is **not wide enough for two large vehicles to pass each other safely** as one of the vehicles must mount the only pavement to enable a passing manoeuvre to take place. Due to the routing of HGVs from the mill at Denham, it would not be possible to reroute these HGVs away from the dangerous pinch point.

Note: the red HGV is on the pavement to allow the white HGV to pass.

This photo shows how narrow the B1118 is at points within the village, with HGVs mounting the only pavement to avoid oncoming HGVs.



This photo is taken outside the primary school, some of the houses on Queens Street have no off road parking and the road is used for resident parking making it single width for a large portion within the village.

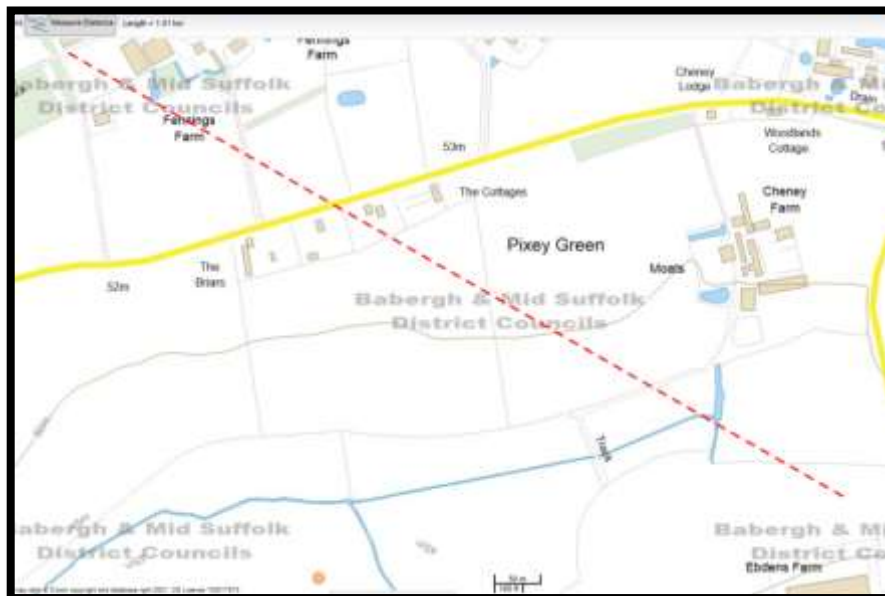
This photo shows the impact on Queens Street of vehicles being unable to pass each other. This photo was taken after the bus in the photo had been stationary for 20 minutes.



7.4 It is not clear from the Transport Assessment how the unacceptable impact on highway safety of additional HGVs travelling along the narrow point on Queens Street can be mitigated, this is contrary to NPPF para. 110 and Policies CL15 and CL17. NPPF para. 111 states that applications can be refused if there is an unacceptable impact on highway safety.

7.5 A report commissioned by County Councillor McGregor and produced by Suffolk County Council in 2019 highlighted that between 1/6/2014 and 1/6/2019 on the Chickering Road section of the B1118 approaching Stradbroke there had been seven collisions at one specific point near the Depperhaugh Nursing Home, with 2 of these resulting in injuries classified as “serious injury”. The report highlighted that the road at this point was dangerous with poor visibility that could not easily be remedied.

7.6 The vehicle movements on the birds out and clean out week, which will occur 7 or 8 times a year, will be significant particularly when viewed cumulatively and in combination with the movements generated by the 9 existing units on the same site and those generated by the nearby 6 units at Ebdens Farm, Pixey Green IP21 5NJ (online mapping tool shows the two intensive poultry unit sites are only 1km apart).



Submitted by:  
Stradbroke Parish Council  
11<sup>th</sup> January 2022

## Fennings Poultry Unit Odour Management Plan

The nature of livestock farming means that preventing odour generation at source is rarely possible as animals are inherently odorous. However, there are many things that can be done, often at low cost, to minimise odour or to prevent it reaching neighbours.

The updated H1 Environmental Risk Assessment submitted with application EPR/BP3633UQ/V006 relating to increasing the installation boundary over land adjacent to Fennings Poultry Unit for development with 6No. houses for rearing poultry, ancillary buildings and drainage and associated structures showed that sources have been identified as contributing to potentially moderate and minor risk of odour. The risk assessment was performed in accordance with EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010; Appendix 4 and the Environment Agency (2011); Additional guidance for H4 Odour Management.

An Odour Management Plan (OMP) has been prepared as part of the environmental management system for Fennings Poultry Unit owing to sensitive receptors within 400 metres including 11 dwellings (excluding a dwelling for the Farm Manager) and commercial premises in Stradbroke Road shown in Table 1 and Figure 1.

### Sensitive Receptors Within 400 metres *(Distances measured on MAGIC Maps)*

Location	Name	Postcode	Receptor	Direction from installation	Distance from boundary metres	Grid reference
Stradbroke Rd, Pixey Green	Old Hall Cottage	IP21 5NF	Dwelling	Southwest	360	TM 24473 75410
Stradbroke Rd, Pixey Green	The Chestnuts	IP21 5NG	Dwelling	Southwest	345	TM 24587 75389
Stradbroke Rd, Pixey Green	C. E. Davidson Limited	IP21 5NH	Offices	South	30	TM 24807 75720
Stradbroke Rd, Pixey Green	C. E. Davidson Limited	IP21 5NH	Workshops	South	0	TM 24885 75756
Stradbroke Rd, Pixey Green	Fennings Farm House	IP21 5NH	Dwelling	East	75	TM 24973 75760
Stradbroke Rd, Pixey Green	North Lane Cottage	IP21 5NH	Dwelling	East	210	TM 25099 75829
Stradbroke Rd, Pixey Green	The Briars	IP21 5NH	Dwelling	South	250	TM 24994 75535
Stradbroke Rd, Pixey Green	Unknown	IP21 5NH	Dwelling	South	270	TM 25067 75562
Stradbroke Rd, Pixey Green	Penny Cottage	IP21 5NH	Dwelling	Southeast	300	TM 25138 75573
Stradbroke Rd, Pixey Green	No.1 The Cottages	IP21 5NH	Dwelling	Southeast	345	TM 25199 75598
Stradbroke Rd, Pixey Green	No.2 The Cottages	IP21 5NH	Dwelling	Southeast	360	TM 25201 75589
Stradbroke Rd, Pixey Green	No.3 The Cottages	IP21 5NH	Dwelling	Southeast	365	TM 25204 75581
Stradbroke Rd, Pixey Green	North Lane Farm	IP21 5NH	Dwelling	East	365	TM 25265 75767



## Fennings Poultry Unit Odour Management Plan

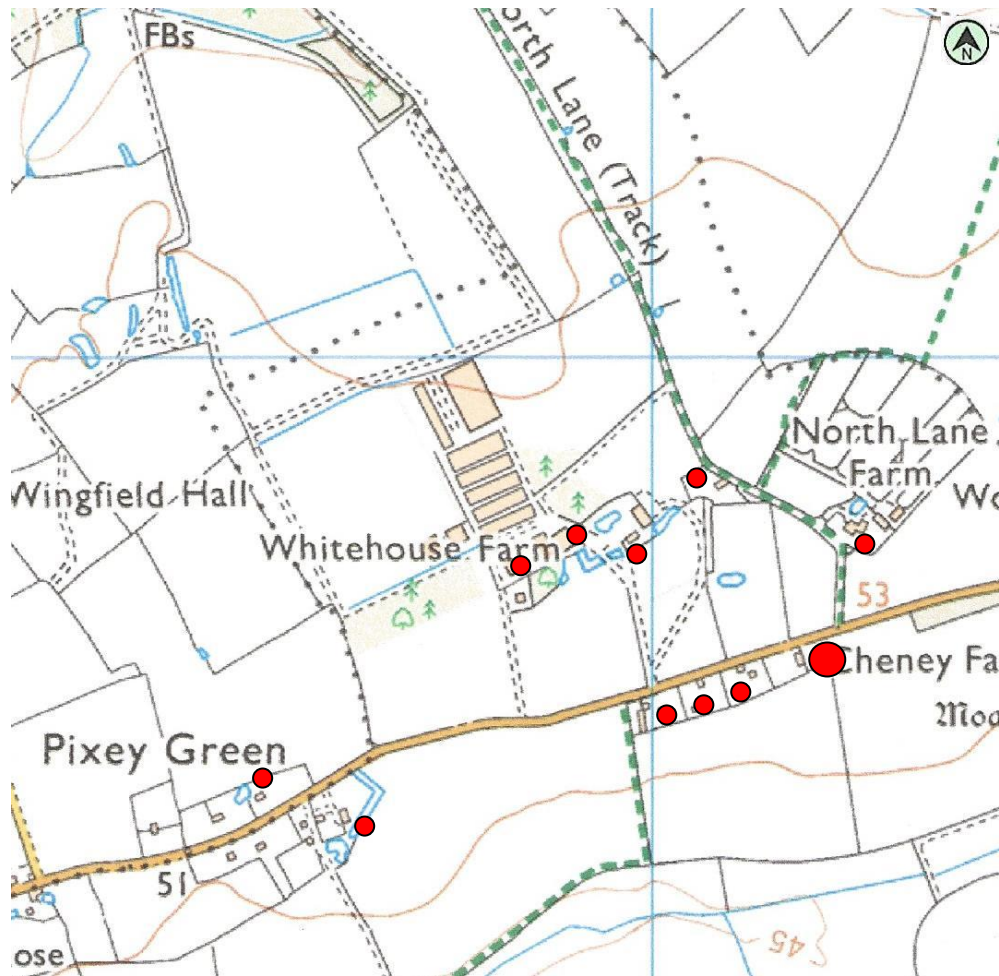


Fig 1. Odour sensitive receptors within 400m Fennings Poultry Unit

Wind direction is defined as the direction from which the wind is blowing. Wind direction will significantly affect how sensitive receptors are affected. According to the Met Office Eastern England climate report - as Atlantic depressions pass by the UK the wind typically starts to blow from the south or south-west, but later comes from the west or north-west as the depression moves away. Directions between south and north-west account for the majority of occasions and the strongest winds nearly always blow from this range. Averaged across the year the wind rose for Coltishall shows that the prevailing wind direction is from the south-west.

All the sensitive receptors are located to the southwest, south and southeast of the installation so are unlikely to be affected most of the time in the prevailing wind, especially in summer when people are more likely to have windows open and to be outside. Sensitive receptors are most likely to be affected when the wind blows from north westerly directions as depressions move away from the UK but occurs less frequently.

The operator has no recollection of any odour complaints or concerns and continues to have good relationships with neighbours.

## Fennings Poultry Unit Odour Management Plan

The following table sets out:-

- The likely sources of odour arising from a typical broiler chicken unit
- The procedures followed or planned at Fennings Poultry Unit in order to prevent or minimise odour levels
- Contingency and emergency planning to limit exposure to elevated odour emissions beyond the installation boundary.

Odour related issue	Potential risks and problems	Actions taken to minimise odour and odour risks at Fennings Poultry Unit	Completion date
<p>Manufacture and selection of feed</p> <p>According to How to comply, a high protein diet increases the nitrogen and sulphur content of the manure, contributing to emissions of ammonia and other odorous compounds.</p>	<ul style="list-style-type: none"> <li>• Feeds which are unbalanced in nutrients, leading to increased excretion and litter moisture, emissions of ammonia and other odorous compounds.</li> <li>• Poor-quality ingredients.</li> </ul>	<p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010:-</p> <ul style="list-style-type: none"> <li>• No feed manufacturing, milling, or mixing on-site.</li> <li>• Feed specifications prepared and continually monitored by nutrition specialists.</li> <li>• Feed composition closely matched to the chicken’s nutritional requirements. Using multiphase, ad-libitum feeding with a minimum of 4 or 5 nitrogen balanced diets to reduce crude protein in each subsequent stage of growing/production.</li> <li>• Using authorised feed additives to lower crude protein. Adding essential amino acid supplements, non-starch polysaccharide enzymes and phytase to reduce nitrogen excretion.</li> <li>• Feeds supplied from mills in certification schemes only using approved ingredients.</li> </ul>	<p>In place</p>
<p>Feed delivery and storage</p>	<ul style="list-style-type: none"> <li>• Delivery</li> <li>• Spillage/spoilage</li> </ul>	<p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Installed package enclosed silos, pipes, augers and feeding equipment to minimise spillages.</li> <li>• Feed silos protected from collision damage by careful siting relative to traffic flows, in between the poultry houses keeping them out of the path of HGVs and provision of concrete kerbs.</li> <li>• Feed delivery vehicles are always covered minimising dust emissions.</li> <li>• Deliveries will be monitored by the driver’s and stockman.</li> </ul>	<p>In place</p>

## Fennings Poultry Unit Odour Management Plan

		<ul style="list-style-type: none"> <li>• Automatic equipment on which chickens depend will be inspected by the stockman not less than once per day to check there are no defects and any defects will be repaired immediately.</li> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Spillage of feed pellets/chick crumbs outside/inside the poultry houses.</p> <p><u>Timeframe for implementation</u> Immediately</p> <p><u>Emergency action</u> Clear up to avoid dust/odour or wetting/spillage/odour.</p>	
<p>Ventilation systems</p> <p>According to the BAT Reference Document - odour from boiler housing is reported to increase in offensiveness with the moisture content of the litter.</p>	<ul style="list-style-type: none"> <li>• Inadequate design causing poor dispersion of odour</li> <li>• Inadequate air movement in the house, leading to high humidity and wet litter</li> <li>• Extraction fans located close to sensitive receptors</li> <li>• Electricity supply disrupted (but electricity outages rarely occur).</li> </ul>	<p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013 and in the DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Forced ventilation installed in all the poultry houses and computer controlled to remove moisture under all weather and seasonal conditions while meeting the physiological needs of the chickens. Regularly adjusting to match the age, the weight and health requirements of the chickens.</li> <li>• Installed high velocity ventilation in all the poultry houses.</li> <li>• Optimising discharge conditions for exhaust air from all the poultry houses using a combination of techniques described in BAT 13 to reduce odour emissions including:</li> <li>• Maximised outlet heights – exhausting air above roof level, air exhaust through the ridge instead of through the walls (BAT).</li> <li>• Increased vertical outlet ventilation velocity having been designed with uncapped outlet cones on all the houses (BAT) with vents greater than 5.5 metres high and fan efflux velocity greater than 7m/s.</li> <li>• Automatic equipment on which chickens depend will be inspected by the stockman not less than once per day to check there are no defects. Any defects will be repaired immediately by the stockman or by professional contractors.</li> </ul>	<p>In place</p>

## Fennings Poultry Unit Odour Management Plan

		<ul style="list-style-type: none"> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p>In addition, at Fennings Poultry Unit:-</p> <ul style="list-style-type: none"> <li>• Tunnel fan outlets on poultry houses 3,4,5,8&amp;9 direct air away from sensitive receptors.</li> <li>• Gable end fans installed on poultry houses 3,4&amp;5 and those to be installed on the 6No. newest houses 10,11,12,13,14&amp;15 will direct air away from sensitive receptors – east and westward respectively.</li> <li>• Gable end fans only used when necessary in the warmest weather and switched off as soon as they are not required. Not used at other times or when removing litter or during cleanout.</li> <li>• Well-established vegetation/hedges/shrubs/trees/grass on the site boundary in close proximity to the gable end fans outside all the houses create turbulence in the outgoing exhaust air flow (BAT).</li> <li>• Installed package stand-by generator for automatic back-up if electricity supply is disrupted. Being tested weekly by the stockman to check there are no defects. Any defects will be repaired immediately by the stockman or by professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Alarm system installed gives warning of electricity outage, high/low temperature in poultry houses/failure of ventilation equipment</p> <p><u>Timeframe for implementation</u> Immediately</p> <p><u>Emergency action</u> Check stand-by generator/fuel tank operating properly, check ventilation extractor fans/tunnel fans/gable end fans are operating properly or repaired immediately if there may be insufficient air changes to maintain bird welfare/ temperature/keep litter dry. Gable end fans may be used to provide additional air extraction.</p>	
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## Fennings Poultry Unit Odour Management Plan

		<p><u>Duration of action</u> Until optimum environmental conditions (e.g. temperature, humidity) are restored to meet chicken's needs. Particular care required to switch off gable end fans which might otherwise increase the exposure of the nearest sensitive receptors to odour/dust/noise.</p> <p><u>Cessation of action</u> When electricity supply is restored/equipment is repaired/optimum environmental conditions have been restored.</p>	
<p>Litter quality</p> <p>According to How to comply, the level of odorant emissions decreases as the quantity of litter per livestock unit is increased - binding nitrogen to reduce odour and ammonia emissions</p>	<ul style="list-style-type: none"> <li>• Insufficient litter</li> <li>• Poor quality litter</li> <li>• Wet litter</li> </ul>	<p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Insulated all walls &amp; ceilings, preventing air moisture condensation and concrete floors provide insulation preventing air moisture condensation and water ingress.</li> <li>• Bedding material spread in a uniform layer over the entire floor area at start of each growing period</li> <li>• Using a proprietary blend of chopped straw/wood shavings or chopped straw for absorbent bedding - which when mixed with droppings will bind the faeces in the litter and provides a dry area.</li> <li>• Monitoring litter daily, any problems will be rectified, if capping occurs extra litter will be added.</li> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Moderately offensive odour/litter capping</p> <p><u>Timeframe for implementation</u> Same day</p>	In place

## Fennings Poultry Unit Odour Management Plan

		<p><u>Cessation of action</u> Optimum environmental conditions are restored (e.g. temperature/humidity/moisture content), litter capping is not spreading.</p> <p><u>Emergency action</u> Check extractor fans are operating properly or repaired immediately to maintain temperature/ventilation/reduce litter moisture content. Add extra litter if capping is not improving.</p> <p><u>Duration of action</u> Continue checking temperature/ventilation/moisture content daily and adding extra litter as required.</p>	
<p>Drinking systems</p> <p>According to the BAT Reference Document, odour from boiler housing is reported to increase in offensiveness with the moisture content of the litter.</p>	<ul style="list-style-type: none"> <li>• Design</li> <li>• Operation</li> </ul>	<p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Installed non-leaking nipple drinkers with cups and will be frequently adjusted to bird eye level to avoid spillages and wet litter.</li> <li>• Daily checking of water lines to avoid leaks/capping of litter.</li> <li>• Automatic equipment on which chickens depend will be inspected by the stockman not less than once per day to check there are no defects. Any defects to be repaired immediately by the stockman or by professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Moderately offensive odour/wet litter next to drinking lines/litter capping</p> <p><u>Timeframe for implementation</u> Same day</p>	In place

## Fennings Poultry Unit Odour Management Plan

		<p><u>Emergency action</u> Check and repair any leaks, moving and drying damp litter, adding extra litter if required or when capping is occurring.</p> <p><u>Duration of action</u> Continue checking lines and repairs daily and adding extra litter as required.</p> <p><u>Cessation of action</u> Reduced moisture content of litter in vicinity of any leak/litter capping is not spreading</p>	
Catching and collection	<ul style="list-style-type: none"> <li>• Odour released via fans and when doors are open to move chickens out.</li> </ul>	<p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Destocking and collecting chickens end of every growing cycle. Occurs only 6 or 7 times every year and takes only a few days.</li> <li>• The configuration of poultry houses ensures collection vehicles are located in front of the houses on the central concrete hard standing during loading, farthest away from sensitive receptors.</li> <li>• Catching and collecting techniques are designed to minimise bird disturbance and minimise dust and odour including using subdued lighting to keep chickens calm and using a modular handling system.</li> <li>• Reducing catcher’s exposure to dust by keeping doors closed and switching on more ventilation fans to create the required airflow. Releasing and dispersing dust and odour via the high velocity fans.</li> <li>• Chicken modules nearly always covered to protect chickens during transport. Covers provide some barrier to releasing dust and odour, but the modules will be uncovered in warmest weather.</li> <li>• Collection vehicles pass-by some sensitive receptors in Stradbroke Road but takes only seconds.</li> <li>• Keeping the houses closed and locked after destocking to contain the dust and moderately offensive odour.</li> </ul>	In place

## Fennings Poultry Unit Odour Management Plan

<p>Removing litter</p> <p>According to How to comply – odorous compounds maybe absorbed onto dust particles and the particles themselves may decompose releasing volatile compounds</p> <p>Generally considered to be dustiest and most odorous activity end of every growing cycle.</p>	<ul style="list-style-type: none"> <li>• Releasing odour via the extraction fans and when doors are open to move litter out.</li> </ul>	<p>Measures are described in and EPA 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Destocking and removing litter end of every growing cycle. Occurs only 6 or 7 times every year and takes only a few days.</li> <li>• Professional contractors removing the litter as soon as possible, normally within one day of destocking, and not normally more than 3 days (e.g. destocking on a Friday and cleaning out on Monday). Removing the litter from all the houses will take place in as short a time as possible.</li> <li>• Removing litter on normal weekdays avoids causing annoyance at weekends.</li> <li>• Clearing build-up of dust deposits from around vents end of cycle.</li> <li>• Removing litter from the floor, using a front end or skid-steer loader to shovel the bulk of the litter carefully and directly from the floor into a waiting lorry/trailer positioned outside the doors to avoid double handling. The doors will be open on to the central concrete hard standing where the contractor’s lorries/trailers will be parked, so not in close proximity to sensitive receptors.</li> <li>• Vehicles/ trailers will be kept covered unless loading.</li> <li>• Collection vehicles will pass-by some sensitive receptors in Stradbroke Road but takes only seconds.</li> <li>• Most of the litter is used for power generation and any which is land-spread will be under the control of a separate farming business and a written agreement is in place.</li> <li>• Keeping houses closed and locked after removing litter to contain the dust and moderately offensive odour.</li> <li>• No used litter will be stored on site.</li> </ul> <p>In addition, at Fennings Poultry Unit:</p> <ul style="list-style-type: none"> <li>• Reducing contractor’s exposure to dust by keeping doors closed and switching on more fans to create the required airflow and disperse dust and odour via the high velocity fans. Gable end fans not used to avoid exposing sensitive receptors to dust and odour.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u></p>	<p>In place</p>
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## Fennings Poultry Unit Odour Management Plan

		<p>Strong northerly winds spreading dust/moderately offensive odour into the gardens of the nearest sensitive receptors in Stradbroke Road, although northerly winds are less common in summer when people are more likely to have windows open and to be outside.</p> <p><u>Timeframe for implementation</u> Immediate</p> <p><u>Emergency action</u> Check actions taken to minimise dust/odour and odour risks are being adhered to. Move on to clearing litter from any other empty houses until wind speed drops. Litter and dust might be dampened ahead of being tipped into the trailer or in the trailer itself.</p> <p><u>Duration of action</u> Removal of litter.</p> <p><u>Cessation of action</u> Finished removing litter/ reduced wind speed.</p> <p>Sometimes opportunities to delay removing litter/washing out houses to avoid causing annoyance to sensitive receptors. However, cleaning/disinfection/drying and setting-up must be completed in readiness for the chicks being hatched for each house. Setting/incubation/hatching is scheduled weeks in advance and generally chicks can't be delivered anywhere else.</p>	
Cleaning	<ul style="list-style-type: none"> <li>• Use of odorous products to clean houses.</li> </ul>	<p>Measures are described in and EPA 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Destocking and cleaning poultry houses end of every growing cycle. Occurs only 6 or 7 times each year and takes only a few days.</li> <li>• Professional contractors washing out the houses as soon as possible, normally within one day of destocking, and not normally more than 3 days (e.g. destocking on a Friday and cleaning out on a Monday). Cleaning out all the houses in as short a time as possible.</li> <li>• Cleaning on normal weekdays avoids causing annoyance at any sensitive receptors especially at weekends.</li> </ul>	In place

## Fennings Poultry Unit Odour Management Plan

		<ul style="list-style-type: none"> <li>• Only use suitable cleaning products and DEFRA approved disinfectants.</li> <li>• Keeping the houses closed and locked after cleaning and drying to contain the less offensive odour.</li> </ul>	
Managing dirty water	<ul style="list-style-type: none"> <li>• Preventing stagnation</li> <li>• Offensive odour from tankers emptying dirty water tanks.</li> </ul>	<p>Measures are described in and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Installed kerbs to concrete aprons in front of the houses to direct dirty water into tanks.</li> <li>• Stockman and cleaning contractors keeping roadways, areas around buildings, dirty water grates and drains clear of litter, etc to avoid backing-up, pooling, or over spilling into surface water drains or on any unmade areas. Dirty water drains are flushed though after cleaning out the houses to prevent stagnation.</li> <li>• Installed package underground tanks with sufficient capacity for storing all the dirty water and access manholes are kept covered.</li> <li>• Professional contractors empty the tanks after cleaning is finished in readiness for the next, which avoids anaerobic conditions developing in the settled sludge.</li> <li>• Odour will be exhausted from the vacuum tanker during the emptying but takes less than an hour and only occurs 6 or 7 times every year and on normal weekdays.</li> <li>• Dirty water spread on land under the control of a separate farming business and a written agreement is in place.</li> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> One or more dirty water storage tanks not been emptied/ dirty water backing up drains/overflowing on to unmade ground/moderately or offensive odour/flyies.</p> <p><u>Timeframe for implementation</u> Immediate</p>	In place

## Fennings Poultry Unit Odour Management Plan

		<p><u>Emergency action</u> Stop washing affected poultry houses. Contact contractor to arrange emptying of storage tanks same day/next day.</p> <p><u>Duration of action</u> Washing can't be resumed until the storage tanks have been emptied.</p> <p><u>Cessation of action</u> Clean up any overflow outside/resume washing out poultry houses.</p>	
Carcass disposal	Inadequate storage	<p>Measures are described in and EPA 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Dead chickens, dead in shell embryos and egg shells will be removed the houses daily.</li> <li>• Storing carcasses, macerated dead-in-shell embryos and egg shells in bespoke, secure, non-leaking, wheelie bins with lids and kept locked.</li> <li>• Wheelie bins located farthest away from sensitive receptors on the central concrete hardstanding in between the new and older houses, but not provided much shade by surrounding buildings.</li> </ul> <div style="display: flex; justify-content: space-around; align-items: center;">   </div>	

## Fennings Poultry Unit Odour Management Plan

		<ul style="list-style-type: none"> <li>• Wheelie bins removed weekly by an approved transporter under the National Fallen Stock scheme. Weekly collections considered normally adequate to prevent odour emissions from the site. Relatively few bins filled/collected with dead chicks/smallest birds for first few weeks of production cycle and increasingly more bins in latter weeks as chickens get bigger and increasing odour hazard.</li> <li>• Collecting/exchanging clean and disinfected wheelie bins for the filled ones.</li> <li>• No cleaning of wheelie bins on site.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Most offensive odour/attracting flies/shortage of wheelie bins/prolonged hot weather (e.g. a heat wave). Met Office definition for a UK heat wave is an extended period of hot weather for 3 consecutive days with daily maximum temperatures meeting or exceeding the heat wave temperature threshold of 27°C for Suffolk.</p> <p><u>Emergency action</u> Contact fallen stock collector immediately for more frequent collections (e.g. daily) starting same day or next day/ provision of more storage containers/sealing the lids with plastic bags/tape/stretch-wrap.</p> <p><u>Duration of action</u> Continue with the frequent collections during hot weather.</p> <p><u>Cessation of action</u> Change in the weather/cooler outside temperature.</p>	
Bio-security	<ul style="list-style-type: none"> <li>• Disease and increased mortality, although significant disease outbreaks in commercial poultry flocks are rare.</li> <li>• Wet litter and increased odour via ventilation fans.</li> </ul>	<p>Measures are described in EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Site will be managed so that all the houses are empty at the same time to facilitate effective cleaning, disinfection, and disinfestations and drying. This all-in-all-out approach also acts as a disease break but also means the concentration of odour peaks from all the houses at the same time.</li> <li>• Professional veterinary input is available at all times.</li> </ul>	In place

## Fennings Poultry Unit Odour Management Plan

		<p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Moderately offensive odour/wet litter/higher mortality/sickness.</p> <p><u>Emergency action</u></p> <ul style="list-style-type: none"> <li>• Investigating mortality and medication and professional veterinary input maybe required.</li> <li>• Contact fallen stock collector immediately for more frequent collections (e.g. daily) starting same day or next day/ provision of more wheelie bins /sealing the lids with plastic bags/tape/stretch-wrap to minimise risk of transmission, and flies and odour.</li> <li>• Temporary carcase storage in empty houses/outside on concrete hard-standing as far away as possible from poultry houses and sensitive receptors and where they will not cause pollution via surface water drains and keep covered.</li> </ul> <p><u>Duration of action</u> Continue treatment/medication and frequent collections while mortality is high.</p> <p><u>Cessation of action</u> Optimum environmental conditions are restored/mortality reduced to normal levels.</p>	
Waste skip	Inadequate storage	<ul style="list-style-type: none"> <li>• Secure, non-leaking, open top skips for storing waste, mostly plastic and paper packaging, metals and wood from maintenance activities, disposable clothing, waste similar to municipal waste from office, etc.</li> <li>• Located farthest away from sensitive receptors and poultry houses.</li> <li>• Skip collected/exchanged normally by a registered carrier at scheduled intervals, but the frequency of collections can be increased anytime.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u> Most offensive odour/hot weather/attracting flies.</p> <p><u>Emergency action</u> Contact waste contractor for exchange/collection same day or next day/keep covered.</p>	In place

**Fennings Poultry Unit Odour Management Plan**

		<u>Duration of action</u> Keep covered until exchanged/collected.	
		<u>Cessation of action</u> Until skip is exchanged/collected.	

**Fennings Poultry Unit Odour Management Plan**

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## **Fennings Poultry Unit Odour Management Plan**

### **1. Responsibility**

The Agricultural Director of Crown Chicken Ltd undertakes to adhere to the agreed plan at all times. The Environment Agency shall be notified without delay of any incident or accident, which is causing or may cause significant pollution as result of odour causing annoyance.

The Farm Manager/Assistant Manager/Stockmen are responsible for monitoring odour releases and emissions, ensuring the actions and emergency actions to minimise odour and odour risks are being adhered to and managing any complaints.

### **2. Contingency control measures including monitoring and complaints**

Measures for monitoring and managing complaints are described in Environment Agency (2011); Additional guidance for H4 Odour Management: How to comply with your environmental permit and BAT 26 in the BAT Conclusions Document (2017).

#### **(a) Monitoring**

- i. Daily checking the actions to minimise odour and risks from odour-related issues are being adhered to and sniff testing.
- ii. Sniff testing behind poultry houses N° 1 and 10 or 15 when the wind is blowing from the north-west, north, or north-east when odour might be expected to cause annoyance at some sensitive receptors in Stradbroke Road.

When northerly winds are blowing towards the sensitive receptors previously less offensive or moderately offensive odour might cause annoyance. In fine weather sensitivity is likely to be increased when people are more likely to have windows open and to be outside.

- iii. Stockman maybe accustomed to the odour through exposure and may not be able to detect or reasonably judge the intensity of odours off-site. People who have not recently been working on the farm might be more helpful. Anyone who has a cold, sinusitis or a sore throat is likely to underestimate the odour. Strong food or drinks, including coffee, should be avoid for at least half an hour before sniff testing and avoid strongly scented toiletries and deodorisers in vehicles.
- i. Sniff testing along the access roadway off Stradbroke Road maybe warranted to substantiate results of on-site testing. Check the actions and the emergency actions in the OMP are being implemented and adhered to.
- ii. It might be prudent to inform residents (neighbours) at sensitive receptors to make them aware an odour nuisance might be expected, has been substantiated and actions are being taken to minimise an odour.



## **Fennings Poultry Unit Odour Management Plan**

- iii. Record in the farm diary an odour nuisance at sensitive receptors which was expected or substantiated, and actions or emergency actions taken to minimise odour as quickly as possible.

### **(b) Complaints**

- i. Complaints must be recorded and investigated immediately including checking the actions and emergency actions to minimise odour and risks are being adhered to. If the odour is no longer apparent the investigation must still be completed and recorded on the same day.
- ii. Tell the complainant and anyone else likely to have been affected what you have done.
- iii. Details of the complaint and the actions taken must be recorded on the Odour Complaint Report form (below) and kept in the site office. A copy must be sent to the Agricultural Director immediately.

### **3. Review**

Review the effectiveness of the OMP including the odour related issues and actions to minimise odour and odour risks at least once a year. Maybe sooner if there have been complaints or relevant changes to any operations or infrastructure.

## Fennings Poultry Unit Odour Management Plan

### History of changes

Version	Review Date	Reviewed by
1	October 2007	Created for installation permit application
1	November 2007	D Bush with no changes made
1	July 2011	D Bush with no changes made
1	July 2012	D Bush with no changes made
1	September 2015	D Bush with no changes made
1	August 2018	D Bush with no changes made
2	June 2020	Generally revised by Green Inc Solutions Ltd to accompany the application for variation to increase the number of places for broiler chickens and increase the installation boundary for development with 6No. poultry houses and equipment to provide the additional places. Identified the sensitive receptors, added further actions to minimise odour and odour risks and contingency controls including monitoring and complaints. The OMP will be approved by the Environment Agency with the new permit variation.

## Fennings Poultry Unit Odour Management Plan

### Odour Complaint Report

Time and date of complaint	
Name and address of complainant	
Telephone number of complainants	

Date of odour	
Time of odour	
Location of odour, if not at above address	
Weather conditions ( <i>dry, rain, fog, snow</i> )	
Temperature ( <i>very warm, warm, mild, cold</i> <i>or degrees if known</i> )	
Wind strength ( <i>none, light, steady, strong, gusting</i> )	
Wind direction ( <i>e.g. from SW</i> )	
Complainant's description of odour What does it smell like?  Odour intensity 0 No odour 1 Very faint odour 2 Faint odour 3 Distinct odour 4 Strong odour 5 Very strong odour 6 Extremely strong odour	
<input type="checkbox"/> Duration (time)	
<input type="checkbox"/> Constant or intermittent in this period	
<input type="checkbox"/> Does the complainant have any other comments about the odour?	
Are there any other complaints relating to the installation, or to that location (either previously or relating to the same exposure):	
Any other relevant information:	
Do you accept that odour likely to be from your activities?	
What was happening on site at the time the odour occurred?	
Actions taken	

## Fennings Poultry Unit Odour Management Plan

Complainant visited		
Complainant contacted with explanation Yes/No Date By whom		
Form completed by	Date:	Signed:

Environment Agency (2011); Additional guidance for H4 Odour Management: How to comply with your environmental permit.

Complaints and the results of the investigation must be recorded on the Odour Complaint Report form and kept in the Complaints Log in the site office. A copy must be sent to the Agricultural Director immediately.

**From:** Hobbs, Kirsty <[kirsty.hobbs@environment-agency.gov.uk](mailto:kirsty.hobbs@environment-agency.gov.uk)>

**Sent:** 30 October 2020 16:38

**To:** [k.collett420@btinternet.com](mailto:k.collett420@btinternet.com)

**Subject:** Application EPR/BP3633UQ/V006 - Fennings Poultry Unit - Request for information

Dear Karl,

**Application Reference: EPR/BP3633UQ/V006**

**Operator: Crown Chicken Limited**

**Facility: Fennings Poultry Unit**

Further to my last email, I have now reviewed the application contents and received initial internal comments. I need to ask you for some more information before I can do any more work on it. Please provide the following:

1. Site boundary

Please check and confirm the correct site boundary and amend any documents, as necessary. The site boundary appears to be slightly different on the following plans: the plan provided for the pre-app request, the site layout/drainage plan provided for this variation and on the site plan for variation V003 (the right edge and the section encompassing the generator and fuel storage). I've attached a copy of the site plan from variation V003 for reference.

Submitted amended drawings:

[Drainage Plan Fennings Farm, Pixey Green, Stradbroke.pdf](#)

[Site Layout Plan Groundsure Land Adjacent to Fennings Farm, Pixey Green, Stradbroke.pdf](#)

Specifically, matched to the existing boundary on eastern side and around the generator and fuel store, so no ground is being excluded or added this side. The boundary on the western side has been extended over more ground to accommodate proposed poultry houses. All the extra ground is covered in the Site Condition Report submitted with the application.

Submitted second Pre-application Request for ammonia screening with the amended Site Layout Plan, owing to operators wanting to increase the number of places they are seeking in a variation up from 560,500 to 570,000. Also submitted amended Part C3.5 in section 8.8d Number of animal places.

2. Site Location Plan

Following on from question 1, please provide a site location plan for the variation. We require a site location plan to be better able to place the installation location in relation to features such as houses, roads, ponds, woods etc.

Submitted OS Location Plan for Fennings Poultry Unit, Pixey Green. Covers approx. six square kilometres with the proposed boundary of Fennings Poultry Unit marked in green in the centre, the B1118 is visible in the south-west corner.

3. National Grid Reference (NGR)

The NGR for the centre of the site provided in the pre-app request form is different to the NGR provided in the Site Condition Report (SCR). Please check the NGR provided and amend the SCR if required.

Submitted SCR with amended NGR on page 1 and deleted reference on page 2, otherwise without any other changes. Site will be centred on NGR TM 24695 75854 including the proposed development with 6No. poultry houses. Established with confidence using OS online standard maps with a better zoom and grid reference finder.

4. Non-technical summary

The response to question 2b is listed as the non-technical summary. Please revise to include a summary of the activities currently at the farm. This will need to include as a minimum, details of the broiler cycle e.g. cycle length, number of cycles.

B2.2b About your proposal – Non-technical summary

The Operator details will be unchanged.

Green Inc Solutions Ltd has been instructed by Mr Peter Davidson of C. E. Davidson Ltd to prepare an application for a variation of the permit head of making a planning application for Crown Chicken Ltd.

Proposing to increase the permitted boundary over adjacent greenfield to the west side of the farm to construct 6No new poultry houses (total 15No poultry houses) with point source emissions to air, water and land, and increase number of places for rearing broiler chickens intensively from 280,000 to 570,000. Also proposing provision for using new technology for hatching eggs inside the existing and proposed poultry houses where the chickens will be reared. A new building is also proposed for an office, mess room and welfare facilities.

Proposed houses will be designed, equipped, and operated in accordance with How to comply EPR6.09 and Best Available Techniques (BAT) conclusions document.

Proposed houses will be designed and constructed to modern specifications – wide span steel portal frames, concrete panel walls and concrete floors poured over a continuous damp proof membrane, insulated walls and low- pitched roofs covered in plastic coated steel cladding. Houses will be ventilated via side inlets on both

sides and the air taken out by high velocity extraction fans on the roofs (vents greater than 5.5m high and efflux velocity greater than 7m/s) with outlet cones, and gable end fans for additional ventilation in warmer weather. Package nipple drinking systems with cups will be installed to avoid spillages and keep litter dry, and water consumption will be monitored daily. Ventilation will be computer controlled to remove moisture under all weather and seasonal conditions while meeting the physiological needs of the chickens. Regularly adjusting ventilation to match age, and weight and health requirements of the chickens, and to help keep droppings and litter dry and friable to reduce ammonia and odour.

Proposed houses will be installed with new package feed silos and feed delivery equipment, new tanks for storing liquid petroleum gas (LPG) for heating and new package underground tanks for storing dirty water similar to existing houses. Otherwise will continue storing mains water and diesel in the existing tanks and in a package back-up generator.

Uncontaminated roof water will be conveyed via stone filled French drains with perforated pipes under the eaves of the 6No. proposed houses acting as soakaways to infiltrate into the ground, then solid underground pipes into an off-site ditch adjacent the northern boundary, next into a watercourse identified as a tributary of the River Waveney. Uncontaminated surface water run-off the open concrete apron (excluding during periods of litter removal and washout) will be conveyed via solid underground pipes also into the off-site ditch. Dirty water from litter removal and washout will be channelled via a diverter into package underground concrete encased dirty water tanks and transferred off-site.

Prior to chickens arriving new bedding material will be spread in a uniform layer over the entire floor area using a proprietary blend of dust extracted chopped straw and wood shavings or dust extracted straw. The poultry houses will be heated using LPG-fired space heaters and temperature and humidity will be controlled. As the chickens grow the temperature will be reduced by using the heaters less and increasing ventilation. Day old chicks will be brought into the houses or incubated eggs for hatching in the houses where the chickens will be reared using latest technology in both the existing and proposed houses. The total number of chickens including any combination of day-old chicks and eggs for hatching on-site will never exceed the number of production places. About a quarter of the chickens will be removed for slaughter around 31 days of age to provide smaller birds for sale and allow the remainder to be reared for longer and will be removed and slaughtered at around 38 days of age. There will be around 10 days empty after destocking for cleaning and disinfection allowing for 7.6 production cycles per annum.

Feed pellets (crumbled first 2 weeks) will be supplied from a local mill in an assurance scheme to provide chickens with balanced diets and with decreasing crude protein and phosphorous, meeting their physiological needs at each stage

of rearing without excess nitrogen and phosphorous being wastefully excreted. Feed will be provided to chickens with pan feeders to reduce wastage and minimise dust.

Unhatched eggs, empty shells and mortalities will be removed daily and recorded. Stored in secure containers to minimise odour and flies, for off-site removal under the Fallen Stock Scheme.

At the end of the rearing periods after chickens have been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel. All the houses and equipment will be pressure washed, disinfected, and dried, before restocking. Dirty water from washing will be conveyed to underground storage tanks and exported off-site. Waste packaging, etc will be removed by a registered waste carrier.

There are no Sites of Special Scientific Interest, ancient woodlands, local wildlife sites, national or local nature reserves within 2km. No internationally designated Ramsar, special areas of conservation or special protection areas within 5km. There are sensitive receptors within 400m, including dwellings and commercial premises and the operator will be complying with the approved odour, noise and dust and bio-aerosol management plans to prevent or minimise annoyance.

5. Raw Materials Inventory

The Raw Materials Inventory included within the Supporting Information document is dated April 2019. Please confirm that this has been reviewed for the proposed changes and provide an updated copy, as necessary.

Submitted C3.8c Raw Materials Inventory for Fennings Poultry Unit including higher stock holding and usage including for the 6No. proposed houses.

6. Site drainage plan

The drainage plan for the new poultry houses, document ref CED-114 and dated 24/07/18, includes a key for dirty water and storm water. Please clarify what is meant by storm water.

Developers reference to mix of uncontaminated roof water from the 6No. proposed poultry houses (10-15) and surface water run-off the concrete apron (excluding all times yards are contaminated e.g. catching, removing litter, and washing).

Application forms Part A and F1 have been submitted with the application, please note that these aren't normally required for Intensive Farming variations where only application form Part C3.5 is required.



Please provide the information requested by 13/11/20. If we don't hear from you, we must return your application.

When we receive the requested information, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

Please contact me if you have any queries.

Kind regards,  
Kirsty

**Kirsty Hobbs**

Senior Permitting Officer, National Permitting Service  
Part of Operations – Regulation, Monitoring and Customer

**Environment Agency**

[kirsty.hobbs@environment-agency.gov.uk](mailto:kirsty.hobbs@environment-agency.gov.uk)

External: 02030 252772 | Internal: 32772

Working Days: Monday to Friday

**DC/21/06824 | Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development) | Land At Fennings Farm Pixey Green Stradbroke Suffolk**

**Horham & Athelington Parish Council Comments**

Horham & Athelington Parish Council have not, formally, been consulted on the planning application DC/21/06824 (above) but wish to make comments on the proposal, in view of the fact that it is likely to have a direct and detrimental impact upon the amenity of the residents of Horham and those of surrounding villages.

**1) HGV Movements and Cumulative Impact**

**Current Situation**

HGVs associated with the Cranswick (Crown) poultry feed mill, which is situated in Denham, currently route through Horham travelling east to Stradbroke and beyond and south to Worlingworth and beyond, transporting poultry feed to Cranswick's large network of intensive poultry units in the region; the HGVs return via the same routes.

Horham residents have noticed a significant increase in the number of HGVs travelling through the village within the last two years, since Crown Milling began operating from the site in Denham and it must be pointed out that the poultry feed lorries have been witnessed travelling in **both** directions through the village, not, as claimed in the applicant's Environment Statement (S5.43) that: "... *Denham Mill operates a one-way system with traffic routing in via Hoxne and leaving toward Horham via Fennings Farm.*"

The B1117 runs through Horham and is not a designated HGV route on the SCC Lorry Route Network. In fact, HGVs travelling between Horham and Stradbroke have to negotiate a tight double bend just outside the Horham village 30mph sign which necessitates HGVs crossing the central white line on the bends. In addition, increased HGV movements on the route between Horham and Stradbroke have been a major contributing factor to the collapse of the high roadside bank near the bridge over Chickering Beck in 2020, where the road width is narrower. Temporary traffic lights had to be installed by SCC Highways, as only a narrow section of the carriageway was passable and remained in place for over a year (between late 2020 and 2021) until finally being removed in December 2021. However, this stretch of road is on an incline and frequently experiences water run-off from adjoining fields during periods of heavy rain, which in turn causes road surface water to rapidly course downhill towards the Beck. This, in addition to increasing HGV movements will lead to further erosion of the roadside bank and will become an ongoing problem and potential road safety hazard.

**Proposed HGV Movements**

With regard to planning application DC/21/06824, the Parish Council notes that S5.41 of the Environment Statement states: "*The following elements and their location are offered as informative and based on existing contracts (they are of course subject to the market and contracts in the event of planning permission): Feed – Denham Mill (30%) and Kenninghall Mill (70%)*". Given the applicant's caveat in brackets and the fact that Denham Mill is situated closest to the application site, it is safe to assume that 30% of the additional 674 HGV movements of feed per year will represent the **minimum increase** in HGV traffic through Horham and surrounding villages.

Denham Mill (Crown Milling) acquired an Environmental Permit in 2021 to increase the production of poultry feed, resulting in nearly 20,000 HGV movements a year. The growing number of HGVs associated with this business, travelling through Horham, has had a detrimental impact on the living conditions of local residents on The Street, especially with regard to the enjoyment of gardens and outdoor space, where conversations are curtailed when two or three lorries pass in quick succession. An increase in HGV traffic associated with this planning application will have a further detrimental impact on the amenity of residents of Horham.

The Environmental Statement S2.8 **Table 2** includes the following SCC Highways (31.3.21) recommendation in the Scoping Report: "*The application should consider any impacts the additional traffic generated by the development will have on the highway network when the facility is in production...*" "*A Transport Management Plan will also be required. Once the details are supplied, **mitigation may be required on the existing highway within surrounding villages; including Eye Town centre.***"

The Parish Council is of the view that the applicant's Transport Assessment does not provide adequate analysis of the cumulative impact of HGV movements on routes between surrounding villages, specifically Horham and including Denham, Stradbroke and Hoxne.

The Transport Assessment does not address how highway safety issues highlighted by Denham Parish Council (concerning the significant increase in the volume of HGVs accessing and leaving the poultry feed mill in Denham and the resulting detrimental impact on the amenity of residents and rising highway safety concerns), Stradbroke Parish Council (concerning restricted two-way HGV movements and the impact on highway safety on Queen Street) and Hoxne Parish Council (concerning the number of vehicle collisions along Chickering Road (B1118) Hoxne, near the entrance to the Depperhaugh Care Home – see SCC Highways Report, November 2019) can be mitigated.

With regard to the SCC Highways Report on Chickering Road (B1118), it should be noted that HGVs transporting poultry feed to and from the mill in Denham, access and exit the B1118 via a junction near the Depperhaugh Care Home, by way of a single carriageway, narrow lane, classified 'C' road, also known as Chickering Road. According to the SCC Highways report there were seven collisions in the 5 year period to 2019, two classified as 'serious' near the entrance to the Depperhaugh Care Home.

The applicant's Environment Statement (S5.25) states that "*Links or junctions that exhibit 1 accident per annum are considered to be significant*" and continues "*Taking this into consideration, it is therefore considered that there are no existing highway safety issues on the local highway network*". S5.26 "*.... there are no highway safety issues that the development is expected to exacerbate.*"

The Parish Council is of the opinion that the proposed development **will** exacerbate the highway safety issues already identified by Denham, Hoxne and Stradbroke and **will** exacerbate the problem of roadside erosion on the stretch of the B1117 between Horham and Stradbroke. The planning application does not identify how the proposed development will meet the requirement of NPPF para.110(d) and is contrary to Policies CL15 and CL17 of the Local Plan.

## **2) Waste**

The Parish Council wishes to bring attention to the fact that there is a lack of information concerning the destination of waste from the application site. The Variation to the Environmental Permit for the facility states: "*Litter will be exported from the installation. Records will be kept of the quantities and the date of transfer, for example to a power station for recovery or third party for spreading on land and the names and addresses of the receiving farms.*"

The removal of waste litter from the application site will generate significant numbers of HGV movements and if not destined for power stations, will be spread on land (unspecified in the supporting documentation for the planning application) which does not belong to the applicant. Legal judgement in the cases of Squire v Shropshire Council and Keating v East Suffolk Council requires that the land destined for the spreading of poultry waste must be identified, for direct and indirect environmental effects to be properly assessed.

This lack of information concerning the removal of waste (both poultry litter and waste water) reinforces the Parish Council's view that the applicant's Transport Assessment does not provide adequate analysis of the cumulative impact of HGV movements on routes between surrounding villages, specifically Horham and including Denham, Stradbroke and Hoxne.

## **3) Water usage**

This planning application will have a very high demand for water. Whilst high water consumption by the poultry meat processing factory on Eye Airfield has been accounted for in the Water Cycle Study (2020), the high demand for water by an increasing number of intensive poultry units supplying the meat factory have not.

Moreover, the Statement of Common Ground between BMSDC and Essex & Suffolk Water (2020) makes clear that that Essex & Suffolk Water "is unable to provide water in the current ...plan period for new non-domestic processing activities" and that to be able to support such 'non domestic' water consumption would "require investment in infrastructure or water transfer, which would unlikely be operational until 2027".

This planning application may put residential development plans at risk but the issue has not been addressed in any of the supporting documentation for the planning application.

## **4) Summary**

Whilst not a formal consultee, Horham & Athelington Parish Council wish to object to planning application DC/21/06824, on the basis of concerns relating to planning matters outlined above.

Submitted by Horham & Athelington Parish Council  
26<sup>th</sup> January 2022

# **Consultee Comments for Planning Application DC/21/06824**

## **Application Summary**

Application Number: DC/21/06824

Address: Land At Fennings Farm Pixey Green Stradbroke Suffolk

Proposal: Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

Case Officer: Mahsa Kavyani

## **Consultee Details**

Name: Mr Andy Parris

Address: The Stooks, New Street, Fressingfield Eye, Suffolk IP21 5PG

Email: Not Available

On Behalf Of: Fressingfield Parish Clerk

## **Comments**

The council noted the fact that HGV traffic would not flow through Fressingfield and recognises the positive effect on the local economy due to the growth in the chicken-economy.

The council recommends approval of this application.



Ms Mahsa Kavyani  
Babergh and Mid Suffolk District Councils  
Endeavor House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Direct Dial: 01223 582740

Our ref: **W:** P01450734

10 January 2022

Dear Ms Kavyani

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND AT FENNINGS FARM, PIXEY GREEN, STRADBROKE, MID SUFFOLK,  
SUFFOLK, IP21 5NH  
Application No. DC/21/06824**

Thank you for your letter of 21 December 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

**Sophie Cattier**

Assistant Inspector of Historic Buildings and Areas  
E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@HistoricEngland.org.uk)



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



Date: 23 September 2022  
Our ref: 406326  
Your ref: DC/21/06824



planningyellow@baberghmidsuffolk.gov.uk

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Ms Kavyani

**Planning consultation:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

**Location:** Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

Since our last response, the applicant has provided additional information (email dated 2 September) and, as such, Natural England offers the following updated advice.

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

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

#### **Chippenhall Green Site of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

This advice is based on the information provided by the applicant that the maximum capacity of chickens per shed is 48,913, as per industry stocking standards and legal requirements. Your authority may wish to consider whether this should be subject to a planning condition.

#### **Other advice**

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

Should the proposal change, please consult us again. If you have any queries relating to the advice in this letter please contact me on 07471 515535.

Yours faithfully  
Joanna Parfitt  
Norfolk and Suffolk Team

Babergh District Council  
Development Control  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2022/127200/02-L01  
**Your ref:** DC/21/06824  
**Date:** 11 August 2022

Dear Sir/Madam

**6NO. POULTRY HOUSES WITH ASSOCIATED ADMIN BLOCKS, FEED BINS  
AND ANCILLARY DEVELOPMENT FENNINGS FARM (ORCHARD HOUSE)  
PIXEY GREEN, STRADBROKE, EYE, IP21 5NH.**

Thank you for re-consulting us on the above application. We have submitted the newly submitted documents and can confirm that we have assessed the updated information relating to the odour model and have provided you further information below.

**Odour**

We have noted the clarification provided by the applicant on the number of broilers that the farm will house - being 530,000 operationally (rather than 570,000 as in the Environmental Permit). Therefore, we now consider this aspect of the odour modelling to be appropriate. Although the odour emissions from the gable end fans are not included in the Odour Modelling and Assessment, we would suggest that you consider this in your assessment of this application, that they are used during hot weather (depending on the age of the broilers) and that these are the days when residents tend to either be outside in their gardens or have house windows open.

We trust the above is useful.

Yours faithfully

**Miss Natalie Kermath**  
**Planning Advisor**  
Direct e-mail [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)

Babergh District Council  
Development Control  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2022/127200/01-L01  
**Your ref:** DC/21/06824  
**Date:** 28 June 2022

Dear Sir/Madam

**6NO. POULTRY HOUSES WITH ASSOCIATED ADMIN BLOCKS, FEED BINS  
AND ANCILLARY DEVELOPMENT FENNINGS FARM (ORCHARD HOUSE)  
PIXEY GREEN, STRADBROKE, EYE, IP21 5NH.**

Thank you for consulting us on the above application. We have reviewed the documents as submitted and can confirm that we have no objection to the proposed development. We have however provided further information below in relation to Odour. Odour falls under an amenity issue and therefore is not within our remit to object upon. You should review the information below in order to make an informed decision on the application.

**Odour**

The Odour Modelling and Assessment that has been provided in this planning application is not accurate enough to provide a view on whether the proposal will be acceptable.

The modelling uses 538,000 broilers as its input figure. But the Environmental Permit for the farm has a capacity of 570,000 broilers. Also the modelling does not assess the odour that might be emitted when the Gable End Fans are in use. The report states that the Gable End Fans are only in use when the outside temperature is greater than 28 degrees C and so is not considered normal operation. However, through experience of inspecting similar broiler units we know that gable end fans are often in use when the temperature might be considered hot but is less than 28 degrees C (it will depend on the age/size of the broilers). These are the days that residents are wanting to use their gardens/outdoor spaces and will tend to have their windows open. So on these days they are more aware of any odours that might affect their enjoyment of the weather. These are often the type of days when we receive reports of odours from broiler units. Gable end fans emit odour and dust at a lower level than the roof vents that are currently included in the model and so may not disperse as efficiently.

Therefore you may consider it appropriate to ask that the effects of the gable end fans be included in the odour modelling/assessment.



The Environmental Permit for the farm requires that the farm "minimise emissions" through the use of Best Available Techniques" (BAT), that are detailed in their Odour Management Plan for the farm. It does not require there to be no odour emissions outside the boundary. It is appropriate for the modelling and assessment provided as part of this planning application to assume that BAT will be used for the construction and operation of the farm.

We trust the above is useful.

Yours faithfully



**Miss Natalie Kermath**  
**Planning Advisor**

Direct e-mail [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)

Growth, Highways and Infrastructure  
Bury Resource Centre  
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IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
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Enquiries to: Matthew Baker  
Direct Line: 01284 741329  
Email: [Matthew.Baker@suffolk.gov.uk](mailto:Matthew.Baker@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: CSF 45147  
Date: 10<sup>th</sup> January 2022

For the Attention of Mahsa Kavyani

Dear Mr Isbell

**Planning Application DC/21/06824/FUL – Land At Fennings Farm, Pixey Green, Stradbroke: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER), in close proximity to a medieval green visible on the Hodskinson's 1783 map of Suffolk (HER ref no. SBK 064) and a medieval artefact scatter (SBK 046). Archaeological investigations undertaken in 1993, during the instillation of a water pipeline, close to the site have identified medieval artefact scatters (WGD 017 & WGD 018) and two scatters of burnt flint (SBK 019 & SBK 020). 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.

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 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

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

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

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

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

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2021).*

**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.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required, prior to the submission of the reserved matters application, 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.

The evaluation should be undertaken once the building on site has been demolished to ground level, but with no grubbing out of foundation.

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,

Matthew Baker

Archaeological Officer  
Suffolk County Council Archaeological Service

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/F180965  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 22/12/2021

Dear Sir

**LAND AT FENNINGS FARM, PIXEY GREEN, STRADBROKE, IP21 5NH**  
**Planning Application No: DC/21/06824**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

**Water Supplies**

Suffolk Fire and Rescue Service records show that the nearest fire hydrant in this location is over 426M from the proposed build site and we therefore recommend 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.

/continued

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appoint Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Copy: [jonny@parkerplanningservices.co.uk](mailto:jonny@parkerplanningservices.co.uk)

Enc: Sprinkler Information

**From:** GHI Floods Planning

**Sent:** 09 February 2022 09:46

**Subject:** 2022-02-09 JS Reply Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk Ref DC/21/06824

Dear Mahsa Kavyani,

Subject: Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk Ref DC/21/06824

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06824.

The following submitted documents have been reviewed and we recommend **approval of this application subject to conditions:**

- Site Layout Ref CM-00967236
- Site Layout (Drainage) Ref CED-LAY2 Rev 4
- Drainage Layout Ref CED-114 Rev 2
- Flood Risk Assessment & Surface Water Drainage Strategy Ref 27344 Rev A

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

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated January 2022, ref: 27344 Rev A) shall be implemented as approved in writing by the local planning authority (LPA). The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Your Ref: DC/21/06824  
Our Ref: SCC/CON/5727/21  
Date: 7 September 2022  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

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

For the attention of: Mahsa Kavyani

Dear Mahsa

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/06824**

**PROPOSAL:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

**LOCATION:** Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

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

Further to additional correspondence and information from the applicant's consultants, a further site visit and consideration of the proposal, we are no longer in a position to uphold an objection on this proposal. Whilst the proposal will generate a modest increase in HGV traffic, it is not at a level that we could maintain an objection upon as having a severe or unacceptable impact (NPPF 111). It should also be noted that significant parts of the identified routes form part of the Suffolk Lorry Route network.

**Recommended planning conditions:**

Condition: All HGV delivery traffic movements to and from the site once the development has been completed, shall be subject to a Deliveries Management Plan which shall be submitted and approval in writing to the Local Planning Authority for approval.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

Reason: In the interests of highway safety, to ensure adequate servicing arrangements are provided for and to reduce or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

Condition: Before the development is commenced details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles, cycles 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 in accordance with the current Suffolk Guidance for Parking where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety.

Condition: Prior to first use visibility splays shall be provided as shown on Drawing No. 210486-01 with an X dimension of 2.4 metres and Y dimensions of 135 and 148 metres [tangential to the nearside edge of the carriageway] and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

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

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) 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.

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**

Growth, Highways and Infrastructure



**From:** Chris Ward

**Sent:** 22 December 2021 16:23

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06824

Dear Mahsa,

Thank you for consulting me about the proposed poultry house development in Stradbroke. On reviewing the documents submitted, I have no comment to make as no Travel Plan has been submitted.

Kind regards

**Chris Ward**

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council



FAO: Planning Department,  
**Babergh Mid-Suffolk District Council**

Ref: DC/21/06824  
Date: 13/01/2022

## HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

### **RE: LAND AT FENNINGS FARM PIXEY GREEN STRADBROKE SUFFOLK**

This application is for the erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development).

The heritage statement accompanying the application describes the impact of the scheme on the nearby designated and undesignated heritage assets. It concludes that the development would result in less than substantial harm to the significance of the Grade II Listed Old Hall Cottage (List UID: 1182816) and that this harm would be at the lower end of the scale. This impact is due to the visibility of the proposed sheds, within the wider setting of the Listed cottage. The Heritage Statement also concludes that there would be no impact on the significance of the other heritage assets, due to separation and the lack of visibility.

In general, I agree with this assessment of the scheme's visual impact. However, the impact on a heritage assets setting cannot be limited to views alone. Other environmental factors, such as noise, increased traffic, vibrations, dust, light, etc, all will have an impact on the setting of a heritage asset.

The Noise Impact Assessment was carried out by Matrix Acoustic Design Consultants and while their assessment does not specifically target the nearby heritage assets, in general they can be considered to be included within the areas assessed. The noise impact assessment states that the majority of transport movements will occur during the working day (07:00 – 20:00hrs), presumably with a minority of further movements also occurring outside of the working day hours. It also states that "*the cumulative noise emissions from roof extract fans with the addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels.*". I conclude from this that there will be a low level of negative impact, due to noise and traffic, particularly on heritage assets closest to the development site.

An assessment of the impact of odours was carried out by Redmore Environmental. The assessment area covered included the majority of the designated and non-designated heritage assets and the subsequent report concludes that the "*predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.*" I conclude from this



that there is likely to be a negligible impact on the setting and significance of the heritage assets, from the odours associated with the operation of the development.

Therefore, the scheme would potentially result in a low level of less than substantial level of harm to the nearby designated heritage assets, due to the negative effect on environmental factors (noise) on their setting, along with a low level of less than substantial level of harm resulting from the detrimental visual impact specifically on the Grade II Listed Old Hall Cottage.

The national Planning Policy Framework (NPPF) states that any harm to, or loss of, the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification (paragraph 200). In paragraph 206 the NPPF states that local planning authorities should look for opportunities for new development within the setting of heritage assets, to “*enhance or better reveal their significance*”. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. I do not find that the proposed development enhances or preserves the positive elements of the setting of the nearby heritage asset and I do not believe the negative impacts of the scheme could be successfully mitigated.

Therefore, the result of the development would be a low level of less than substantial harm to the nearby heritage assets, which would need to be weighed against the public benefits of the proposal, in accordance with Paragraph 202 of the NPPF.

David Sorapure  
Built Heritage Consultant  
Place Services

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

**From:** Hannah Bridges  
**Sent:** 11 January 2022 13:43  
**Subject:** Planning Application DC/21/06824

Good Afternoon,

Waste Services has no specific comments in relation to this planning application.

Kind regards

Hannah Bridges  
Waste Management Officer - Waste Services  
Mid Suffolk and Babergh District Councils - Working Together

**From:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Sent:** 13 Sep 2022 09:40:28

**To:**

**Cc:**

**Subject:** FW: DC/21/06824 poultry houses, committee item

**Attachments:**

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**From:** Hamish Jackson - Ecological Consultant <[Hamish.Jackson@essex.gov.uk](mailto:Hamish.Jackson@essex.gov.uk)>

**Sent:** 12 September 2022 12:57

**To:** Mahsa Kavyani <[Mahsa.Kavyani@babberghmidsuffolk.gov.uk](mailto:Mahsa.Kavyani@babberghmidsuffolk.gov.uk)>; Sue Hooton, Principal Consultant Ecologist <[sue.hooton@essex.gov.uk](mailto:sue.hooton@essex.gov.uk)>

**Cc:** Julie Havard <[Julie.Havard@babberghmidsuffolk.gov.uk](mailto:Julie.Havard@babberghmidsuffolk.gov.uk)>; Gemma Walker <[Gemma.Walker@babberghmidsuffolk.gov.uk](mailto:Gemma.Walker@babberghmidsuffolk.gov.uk)>; Gen Broad - Ecological Consultant <[Gen.Broad@essex.gov.uk](mailto:Gen.Broad@essex.gov.uk)>

**Subject:** RE: DC/21/06824 poultry houses, committee item



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

Good afternoon Mahsa,

I have had a look through the further Ammonia Assessment and can confirm that the updated assessment demonstrates that there is unlikely to be any impact upon the Chippenhall Green Site of Special Scientific Interest (SSSI) from increased Ammonia. This is because the report appears to be completed appropriately and the predicted impacts will be below 1% in-combination assessment threshold.

However, as we are not air quality experts, we recommend that Natural England should provide a further consultation response, before we provide formal comments on this matter. Therefore, I note that their comments were expected on the 6<sup>th</sup> September, so have you had any update on when these comments will be provided?

This is the only outstanding matter for ecology and we will recommend conditions for a CEMP, LEMP and Wildlife Sensitive Lighting if the LPA is minded to approve the application.

Let me know if you have any queries,

Kind regards,

Hamish

**Hamish Jackson** ACIEEM BSc (Hons)  
**Ecological Consultant** at Place Services

telephone: 03330 320980 mobile: 07740901139

email: [hamish.jackson@essex.gov.uk](mailto:hamish.jackson@essex.gov.uk) / [PlaceServicesEcology@essex.gov.uk](mailto:PlaceServicesEcology@essex.gov.uk)

web: [www.placeservices.co.uk](http://www.placeservices.co.uk)

linkedin: [www.Linkedin.com/in/hamishjackson/](http://www.Linkedin.com/in/hamishjackson/)

Pronouns: He / Him





20 January 2022

Mahsa Kayvani  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

By email only

---

*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/21/06824  
**Location:** Land At Fennings Farm Pixey Green Stradbroke Suffolk  
**Proposal:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

Dear Mahsa,

Thank you for consulting Place Services on the above application.

**Holding objection due to insufficient ecological information upon statutory designated sites (Chippenhall Green Site of Special Scientific Interest)**

**Summary**

We have reviewed the Ecology Report (Wild Frontier Ecology Ltd, December 2021) and the Ammonia Assessment (Redmore environmental Ltd, October 2021), submitted for the applicant, relating to the likely impacts of development on designated sites, protected and priority species / habitats.

We are not satisfied that there is sufficient ecological information available for determination.

We note the close proximity of Chippenhall Green Site of Special Scientific Interest (SSSI), which is a lowland meadow with calcareous clay soil that is highly sensitive to an increase of NH<sub>3</sub> emissions. As a result, we have reviewed the Ammonia Assessment (Redmore environmental Ltd, October 2021) and note that the assessment only considers impacts from increased NH<sub>3</sub> emissions from the development alone and has not considered potential impacts in-combination assessment of other plans and projects. This is a requirement for all SSSI's and Habitats Sites (Special Protection Areas, Special Areas of Conservation and Ramsar Sites). As a result, the Ammonia Assessment will need to be updated to consider likely impacts from all plans or projects, which are likely to be relevant to this application.



In addition, we note that the Planning Statement (Parker Planning Services, November 2021) submitted within this application states that each shed will contain 51,300 chickens, whereas the Ammonia Assessment report (Redmore Environmental, October 2021) states that 6 poultry sheds containing 48,913 chickens. As a result, the modelling will need to be re-calculated using the maximum capacity of poultry within each broiler shed.

However, it is indicated that we do support the measures identified in Ecology Report (Wild Frontier Ecology Ltd, December 2021) and are satisfied that impacts can be avoided for Great Crested Newt, which is known to be present within the immediate vicinity of the site.

Therefore, this further information is required to provide the LPA with certainty of impacts on designated sites and enable it to demonstrate compliance with its statutory duties.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**

Ecological Consultant

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

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

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

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 08 Aug 2022 09:40:27

**To:**

**Cc:**

**Subject:** FW: PLANNING APPLICATION: DC/21/06824 STRADBROOKE - SECOND MEMO

**Attachments:**

---

**From:** Susan Lennard <Susan.Lennard@baberghmidsuffolk.gov.uk>

**Sent:** 08 August 2022 09:32

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>; Susan Lennard <Susan.Lennard@baberghmidsuffolk.gov.uk>

**Subject:** PLANNING APPLICATION: DC/21/06824 STRADBROOKE - SECOND MEMO

**PLANNING APPLICATION: DC/21/06824**

**OUR REFERENCE: 310391**

**PROPOSAL: Re consultation (Submission of Ammonia Assessment) Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)**

**LOCATION: Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk**

**CONSULTEE COMMENTS: Noise, odour, light, smoke.**

Dear Sirs

I write with regard to the above planning consultation for which we have been reconsulted in respect of the submission of an Ammonia Assessment.

Having reviewed the sites planning history and associated planning documentation we would offer the following observations;

- Pixley Farm currently operates as a poultry farm with 9 sheds housing approximately 259,000 birds. Each growing cycle is 38 days with 7.5 cycles per year.
- There are a number of residential dwellings in the locality which are privately owned and occupied. The closest of these is approximately 415 metres to the east.
- A Scoping Opinion was issued in April 2021.
- This service provided the following comments in respect of the scoping opinion;

*Having reviewed the submitted proposal and the Parker Planning Services scoping report dated March 2021 I am satisfied that the odour and ammonia methodology is acceptable. Can I ask that the consultants confirm whether the assessed levels will incorporate the existing on site poultry houses to show the overall effect from the site as the combined emissions will form part of the same operation.*

- The units would be ventilated with ridge mounted fans. Gable end fans are also proposed to be used when temperatures exceed 28 degrees or in the event of ridge fan failure.

- **An odour assessment has been undertaken by** Redmore Environmental (13<sup>th</sup> October 2021), which outlines: “**potential odour releases were defined based on the size and nature of the existing and proposed rearing operations. These were represented within a dispersion model produced using ADMS-5. Impacts at sensitive receptors in the vicinity of the site were quantified, the results compared with the relevant odour benchmark levels and the significance assessed in accordance with the IAQM guidance. Predicted odour concentrations were below the relevant EA odour benchmark**”



**level at all receptor locations for all modelling years. The significance of predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.**

- The site is permitted by the Environment Agency (Permit No EA/EPR/BP3633UQ/V006).
- Waste will be removed directly from sheds onto covered lorries, there is no interim site storage.
- A diverter valve will direct foul water arising from site to sealed underground storage tanks pending removal by contractor from site.
- No details have been provided in relation to storage or disposal of dead birds.
- An Ammonia assessment has been provided by C.E Davidson
- A noise assessment in accordance with BS4142:2014 has been undertaken by Matrix Acoustic Consultants (May 2021) . The report concludes that
  - ***The BS4142 noise impact of the extract fans and transport activities during the day and evening will be low (with the contribution of the gable end fans) to very low (without the gable end fans).***
  - ***During the night the aggregate ambient noise ingress via an open window of the roof extract fans and transport activities have been established to be below the existing underlying noise environment and >10dB below BS8233's noise ingress limits for bedrooms (limits are applicable to road traffic and continuous operating plant).***
  - ***Background noise levels at Positions 1, 3 and 4 are:***
    - ***Day (07:00 – 20:00hrs): LA90 36dB***
    - ***Evening and night (20:00 – 07:00hrs): LA90 26dB***
    - ***Night (23:00 – 07:00hrs): LA90 23dB***
  - ***The individual maximum noise events generated by the HGVs loading/unloading will result in noise ingress levels via an open window below LAmax,F 45dB. In accordance with ProPG (2017) this indicates a negligible noise impact with regard to sleep disturbance.***
  - ***We therefore conclude that during the night the absolute noise levels will result in a very low noise impact.***
  - ***The Rating Levels of the roof extract fans will be at highest 10dB below the typical background noise levels during the day and evening, and result in an inaudible 3dB noise ingress.***
  - ***addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels.***
  - ***The cumulative noise impact of the enlarged poultry development will be low day and night.***

The farm operates under a permit issued and regulated by the Environment Agency under Environmental Permitting (England and Wales) Regulations 2016. This permit controls emissions to land air and water. The proposed expansion of the farm will require a variation to the existing permit (if this has not already been undertaken). Emissions to include noise, odours and waste should be considered as part of this variation process by the Environment Agency who we note have been consulted on this proposal.

No additional detail has been provided in respect of pest prevention and control (including flies), including interim storage and disposal of waste products. In order for this service to provide final comments we would wish to see this information provided.

Regards

**Please note I am a part time officer working each Monday Tuesday and Wednesday each week.**

**Babergh and Mid Suffolk District Councils – Working Together**

[Susan.lennard@babberghmidsuffolk.gov.uk](mailto:Susan.lennard@babberghmidsuffolk.gov.uk)

01449 724943

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 11 Jan 2022 09:15:01

**To:**

**Cc:**

**Subject:** FW: (301701) DC/21/06824. Land Contamination

**Attachments:**

---

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

**Sent:** 11 January 2022 07:25

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Subject:** (301701) DC/21/06824. Land Contamination

**EP Reference : 301701**

**DC/21/06824. Land Contamination**

**Land at Fennings Farm, Pixey Green, Stradbroke, EYE, Suffolk.**

**Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development).**

Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

For the purposes of clarity these comments **only** relate to matters of Land Contamination.

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](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*

---

**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

- 1. All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
- 2. A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*

3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be:*
  - *re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment;* or
  - *treatment of material on site to meet compliance targets so it can be re-used;* or
  - *removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

**From:** Jennifer Lockington  
**Sent:** 22 December 2021 16:01  
**Subject:** DC/21/06824 - Air Quality

Dear Mahsa

YOUR REF: 21/06824

OUR REF: 301700

**SUBJECT:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)  
Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

**Please find below my comments regarding air quality matters only.**

Thank you for your consultation on the above application.

I understand that air quality has previously been scoped out of the Environmental Impact Assessment. Therefore I do not have concerns that the health based Air Quality Objectives will be exceeded because of this proposal.

I have no objections with regard to air quality.

Regards

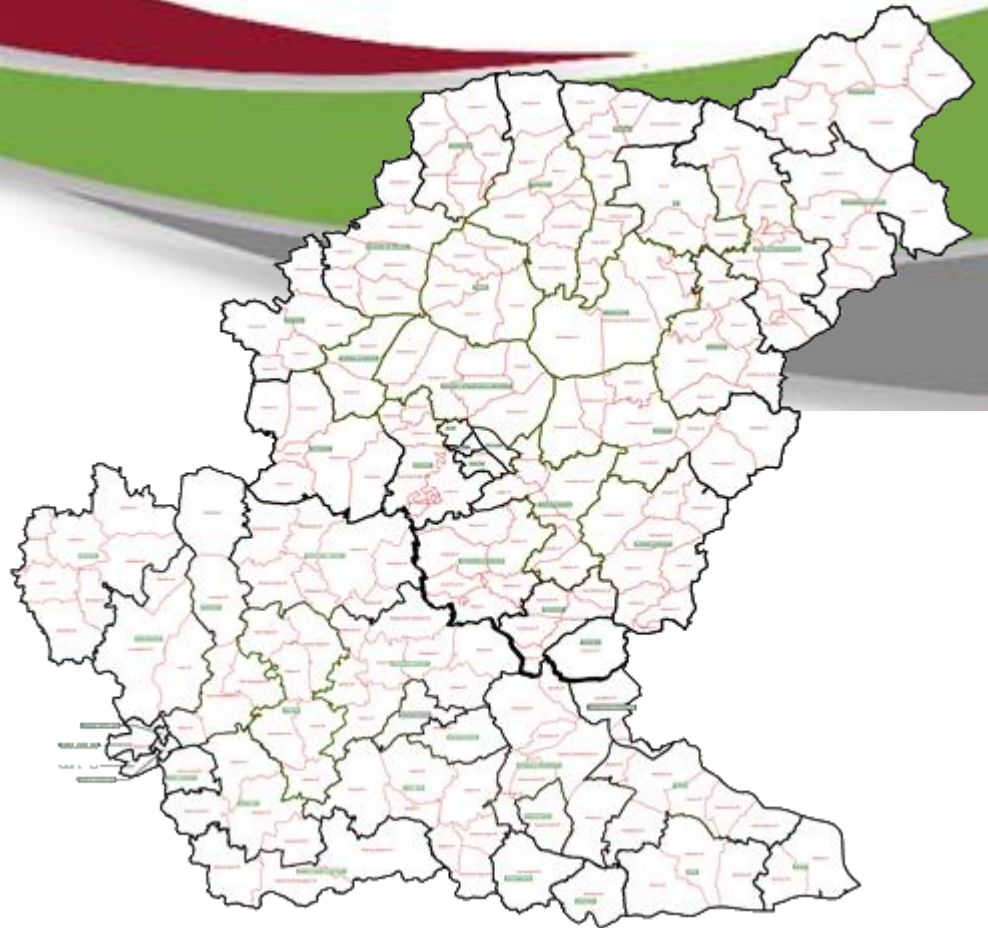
**Jennifer Lockington (Mrs)**  
Senior Environmental Management Officer  
**Babergh & Mid Suffolk District Councils - Working Together**  
tel: 01449 724706  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Please note - I work Tuesdays and Wednesdays

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**Application No:**  
DC/21/06824

**Address:**  
Land At Fennings Farm  
Pixey Green  
Stradbroke





## Aerial Map

Slide 2

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## Aerial Map – wider view

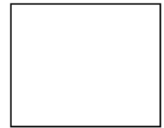
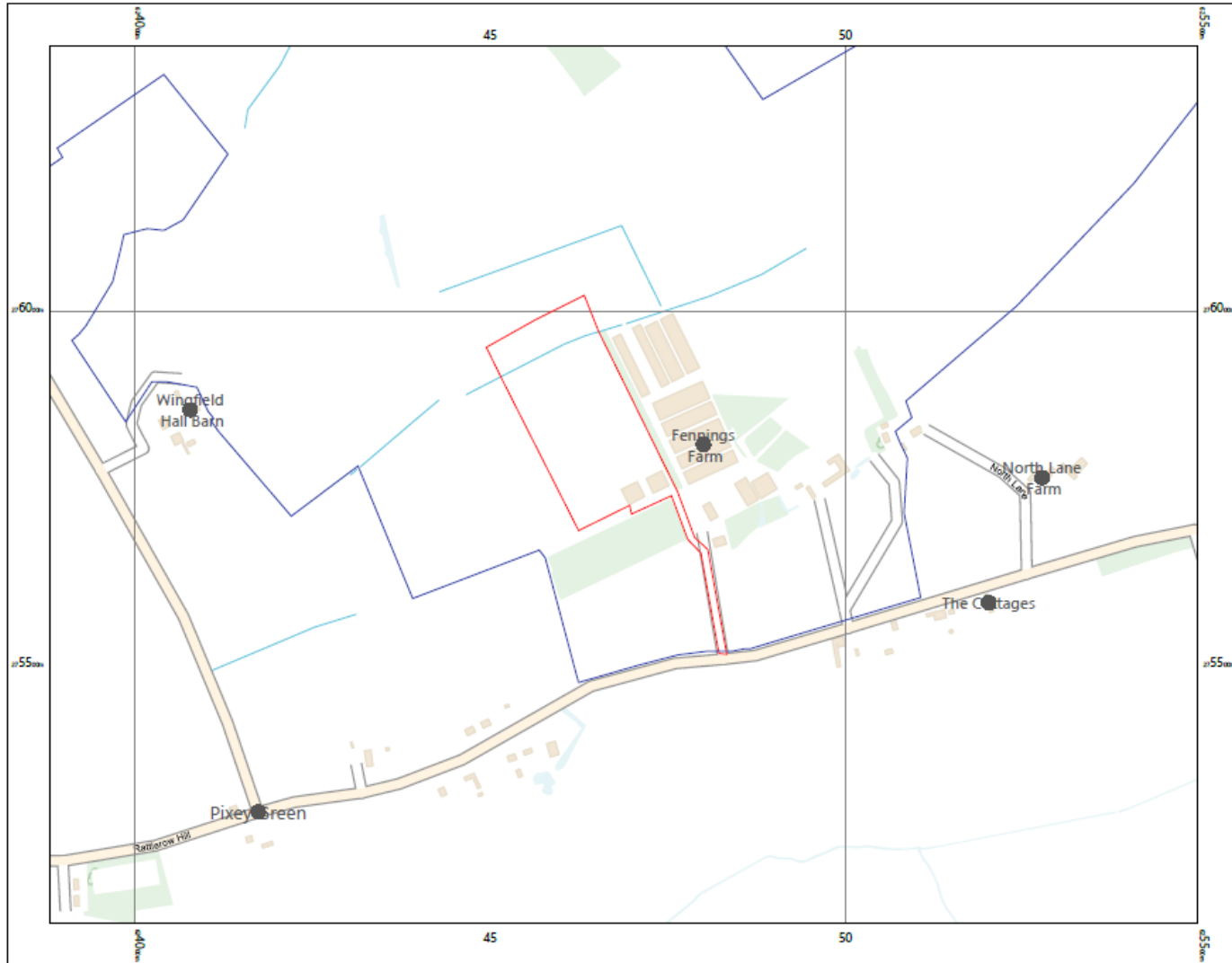
Slide 3

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Fennings Farm - Site Layout





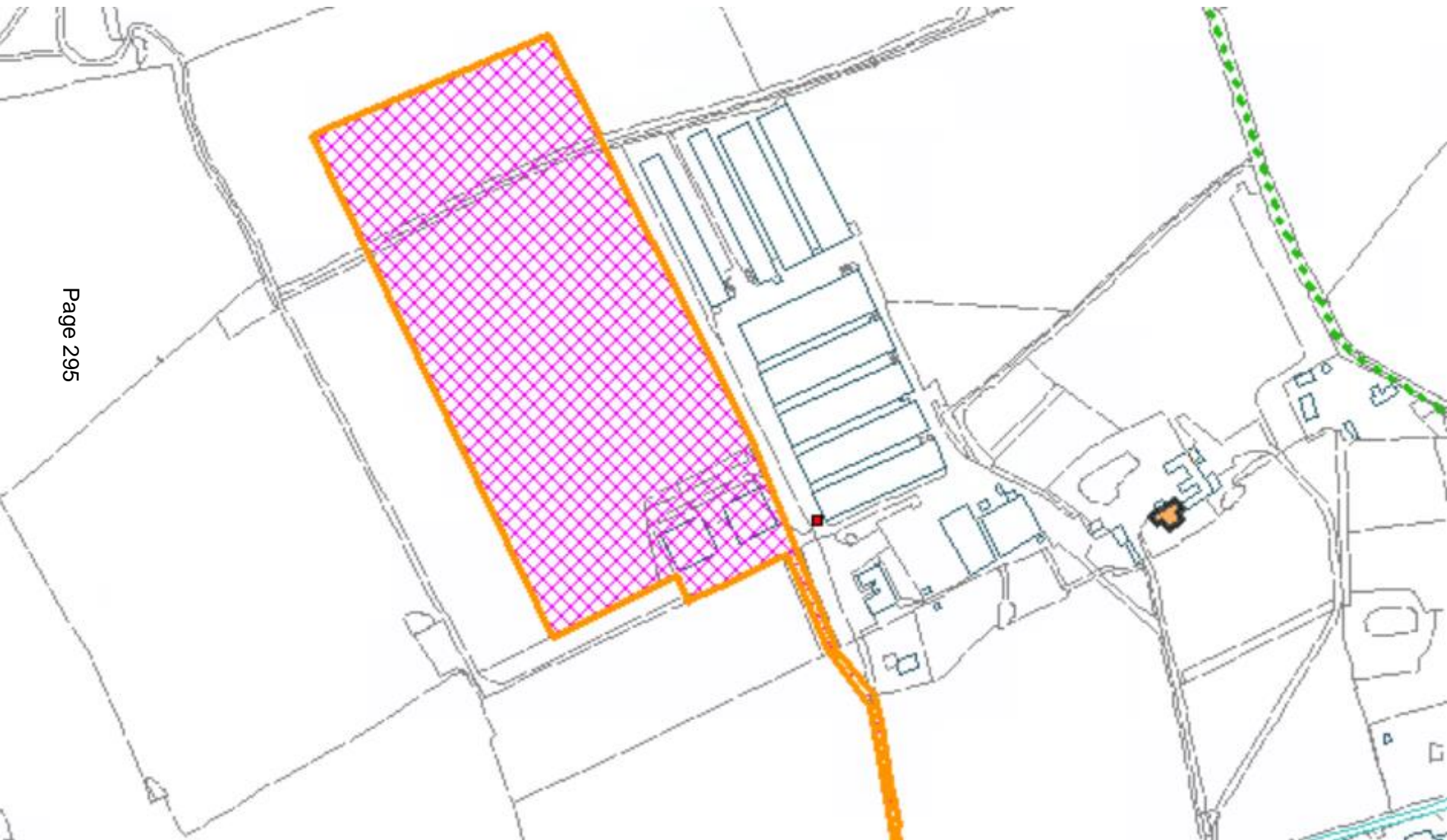
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# Constraints Map

Slide 5

-  Grade II
-  Footpath



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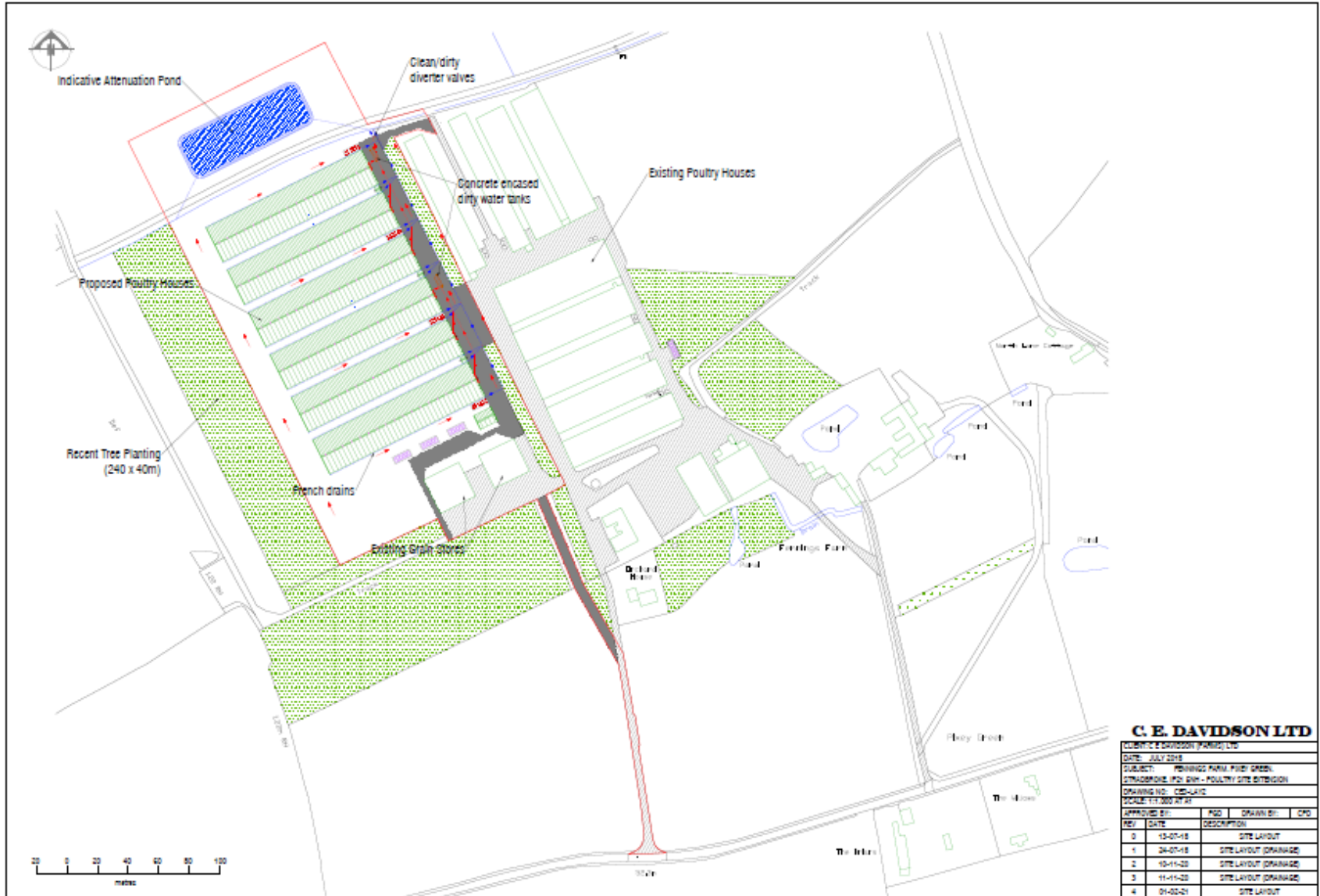
## Constraints Map

- ..... Footpath
- Grade II

Slide 6

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**C. E. DAVIDSON LTD**

C. E. DAVIDSON PARTNERS LTD

DATE: JULY 2018

SUBJECT: FENNING FARM FISH BREED

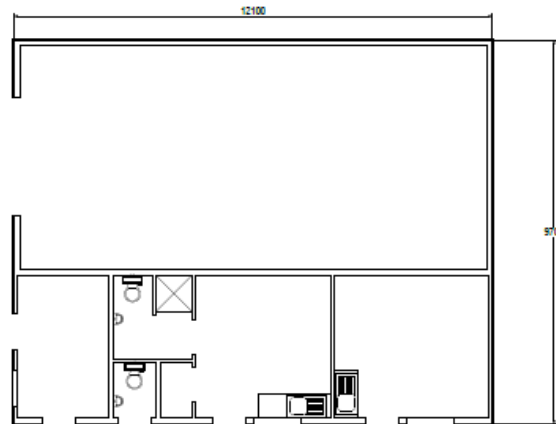
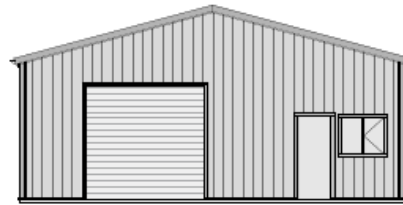
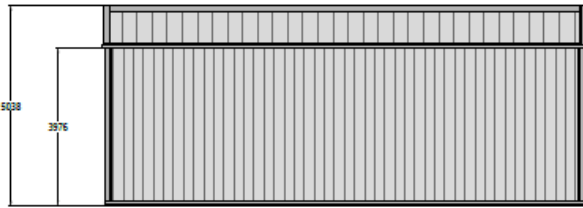
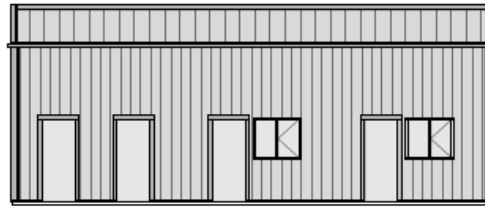
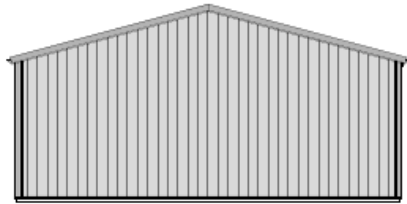
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DRAWING NO: CD/18/12

SCALE: 1:1 300 A3

REV	DATE	DESCRIPTION	APP'D	DRAWN BY	CPD
0	15-07-18	SITE LAYOUT			
1	24-07-18	SITE LAYOUT (DRAINAGE)			
2	15-11-20	SITE LAYOUT (DRAINAGE)			
3	11-11-20	SITE LAYOUT (DRAINAGE)			
4	01-02-21	SITE LAYOUT			

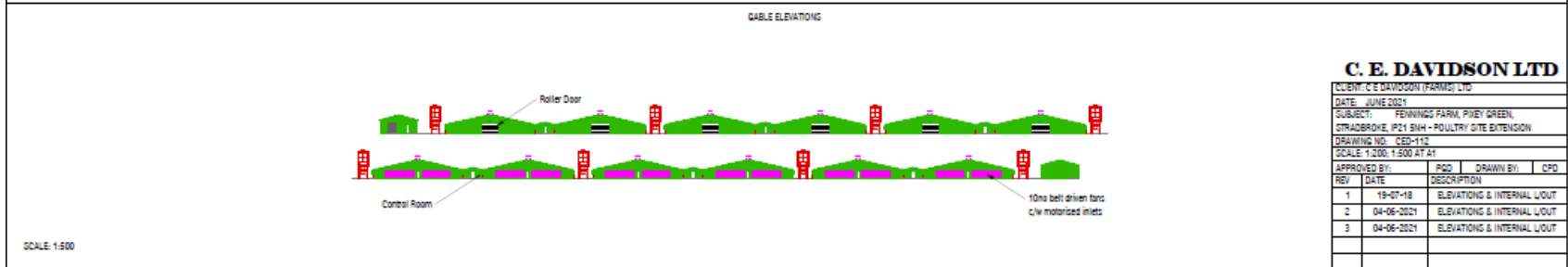
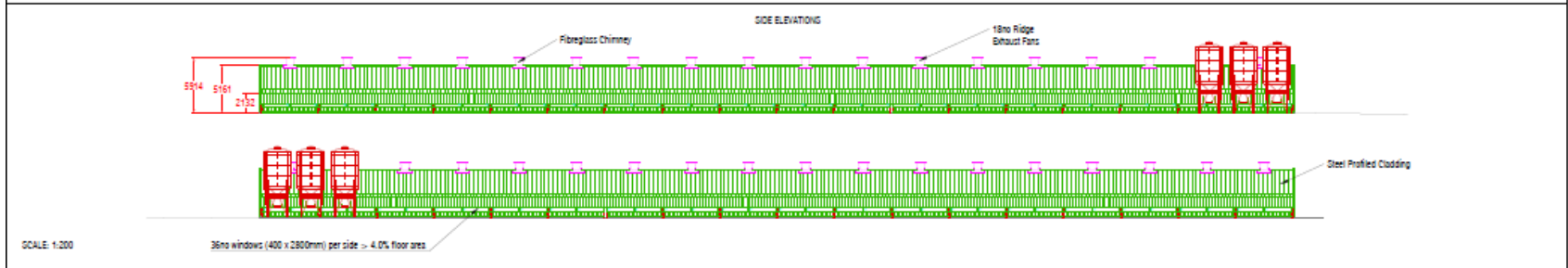
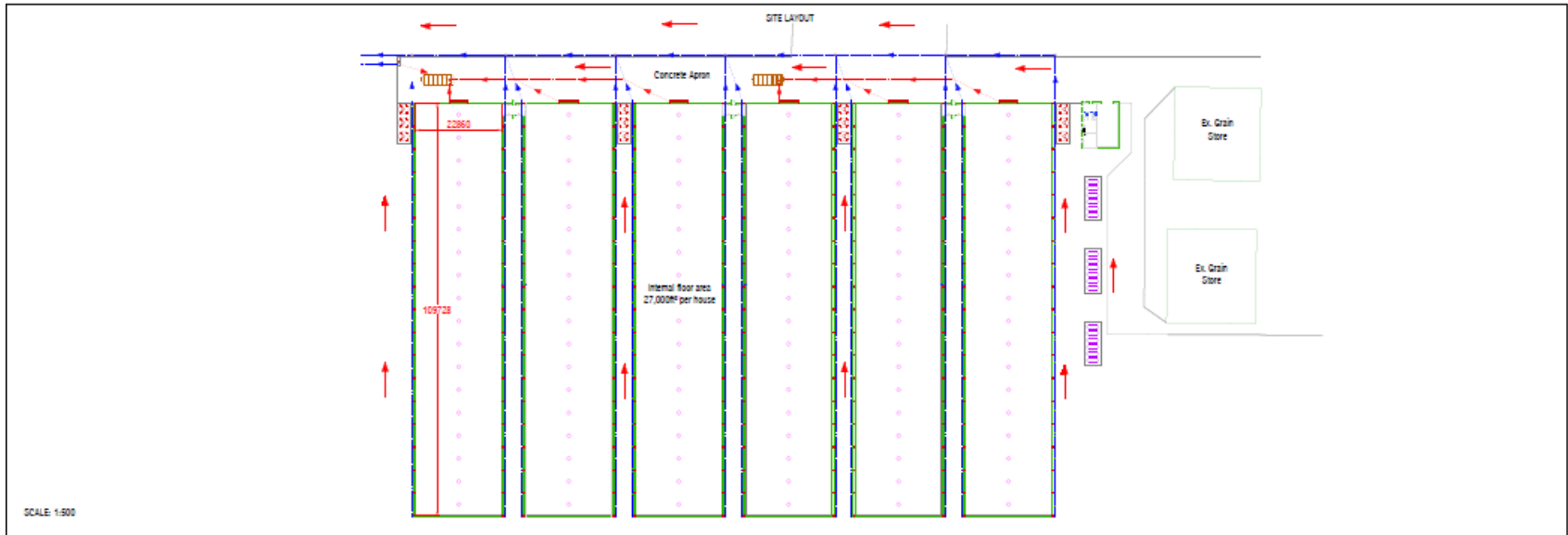
ELEVATIONS



**C. E. DAVIDSON LTD**

CLIENT: C E DAVIDSON (FARMS) LTD  
 DATE: JUNE 2021  
 SUBJECT: PENINGS FARM, PIKEY GREEN,  
 STRADBROKE, IP21 5NH - POULTRY SITE EXTENSION  
 DRAWING NO: CED-ADMIN  
 SCALE: 1:50 AT A1

REV	DATE	DESCRIPTION	POD	DRAWN BY:	CPD
1	04-06-2021	ADMIN BLOCK & STORE			



**C. E. DAVIDSON LTD**

CLIENT: C E DAVIDSON (FARMS) LTD

DATE: JUNE 2021

SUBJECT: FEVINGS FARM, PUXEY GREEN, STRADBROKE, IP21 5NH - POULTRY SITE EXTENSION

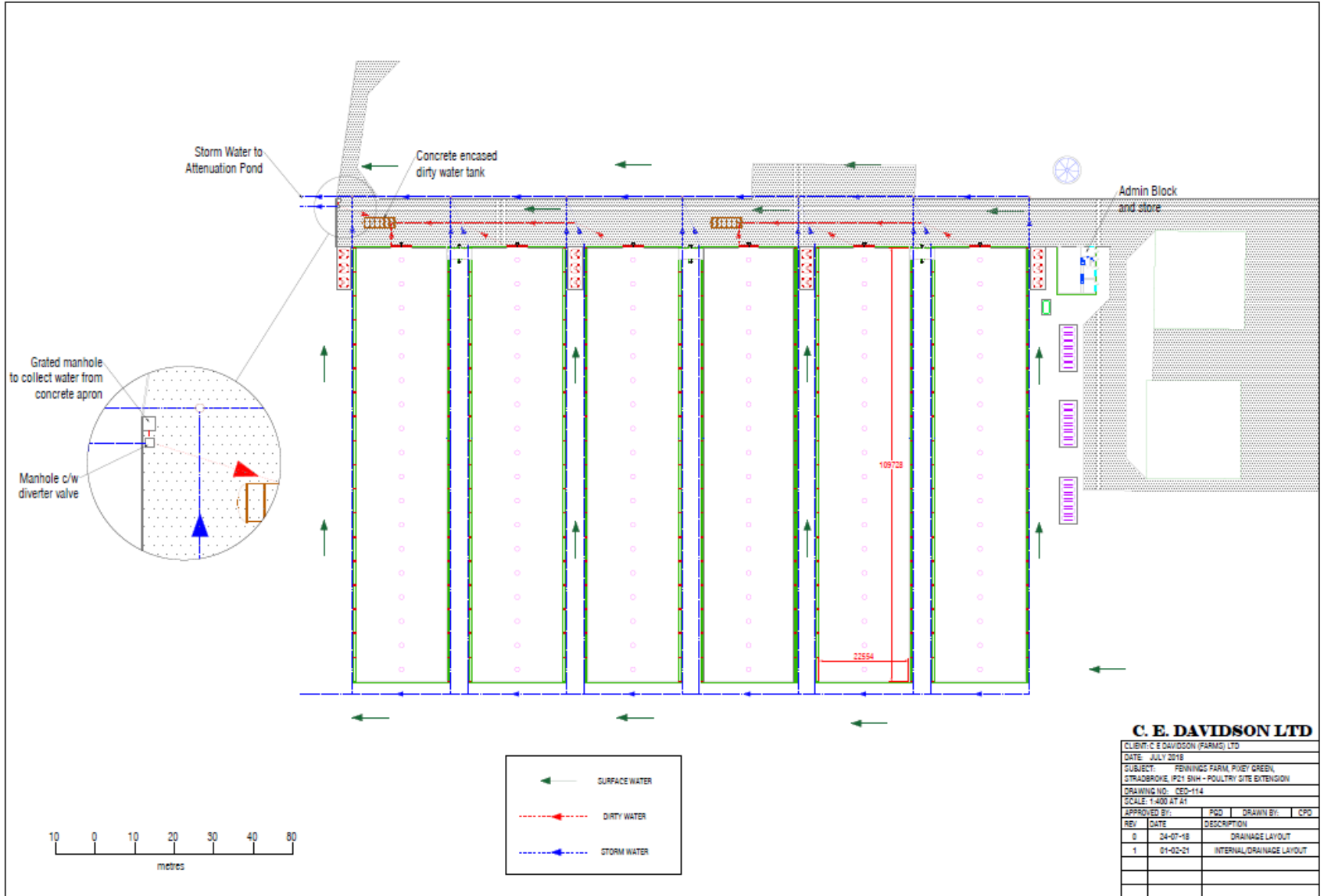
DRAWING NO: CED-113

SCALE: 1:200; 1:500 AT A1

APPROVED BY:	PGD	DRAWN BY:	CPD
REV	DATE	DESCRIPTION	
1	19-07-18	ELEVATIONS & INTERNAL LAYOUT	
2	04-06-2021	ELEVATIONS & INTERNAL LAYOUT	
3	04-06-2021	ELEVATIONS & INTERNAL LAYOUT	

# Drainage Layout

Page 300



**C. E. DAVIDSON LTD**

CLIENT: C E DAVIDSON (FARMS) LTD  
 DATE: JULY 2018  
 SUBJECT: PENNING'S FARM, PINEY GREEN,  
 STRADBROKE, IP21 5NH - POULTRY SITE EXTENSION  
 DRAWING NO: CED-114  
 SCALE: 1:400 AT A1

REV	DATE	DESCRIPTION	APP'D	DRAWN BY:	CPD
0	24-07-18	DRAINAGE LAYOUT			
1	01-02-21	INTERNAL DRAINAGE LAYOUT			



# Agenda Item 7d

## **Committee Report**

**Item No:** 7D

**Reference:** DC/22/01535

**Case Officer:** Mahsa Kavyani

**Ward:** Bacton

**Ward Member/s:** Cllr Andrew Mellen

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## **RECOMMENDATION – REFUSE PLANNING PERMISSION**

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### **Description of Development**

Application for Outline Planning Permission (All Matters Reserved) Town and Country Planning Act 1990 - Erection of 1 self-build detached dwelling with garage.

### **Location**

Land At, Blacksmith Road, Cotton, IP14 4QN

**Expiry Date:** 18/05/2022

**Application Type:** OUT - Outline Planning Application

**Development Type:** Minor Dwellings

**Applicant:** Mrs Megan Youssef

**Agent:** Philip Cobbold

**Parish:** Cotton

**Site Area:** 0.10ha

**Details of Previous Committee:** Yes

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

**Has the application been subject to Pre-Application Advice:** No

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## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

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The application is referred to committee for the following reason:

Previously the item was presented to committee and was recommended for refusal by members. Subsequently the applicant raised objection that the Officer's report has failed to mention that the proposal is for a self-build plot. The Local Planning Authority has resolved to bring the item for another consideration to the committee, so that the item can be considered with due regard to this. Please note that the assessment of self-build is detailed at paragraph 3 under Policy Context heading, as an addition to the original report.

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## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

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### **Summary of Policies**

NPPF National Planning Policy Framework 2021

### Core Strategy Focused Review 2012:

FC01 - Presumption In Favour of Sustainable Development  
FC01\_1 - Mid Suffolk Approach to Delivering Sustainable Development  
FC02 - Provision and Distribution of Housing

### Core Strategy 2008:

CS01 - Settlement Hierarchy  
CS02 - Development in the Countryside & Countryside Villages  
CS05 - Mid Suffolk's Environment

### Mid Suffolk Local Plan 1998:

GP01 - Design and layout of development  
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  
T09 - Parking Standards  
T10 - Highway Considerations in Development

### Supplementary Planning Documents:

Suffolk Adopted Parking Standards (2019)

### **Neighbourhood Plan Status**

This application site is not within a Neighbourhood Plan Area.

### **Consultations and Representations**

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

#### **A: Summary of Consultations**

##### **Parish Council (Appendix 3)**

##### **Cotton Parish Council**

Councillors considered this application and after discussion agreed to recommend REFUSAL for the following reasons:

1. CS2 identifies the Countryside as the least preferable location for development, with development permitted only in exceptional circumstances subject to a proven justifiable need - the Parish Council undertook a consultation recently which confirms and justifies the need for cheap houses for younger families and properties for current residents to downsize into;

2. CS2 also states countryside development will be restricted to defined categories in accordance with other Core Strategies none of which are relevant to this application;
3. further to a local consultation, five years ago, residents offer strong support to development on Blacksmiths Road on a brownfield site;
4. this application being considered is outside the settlement boundary and would cause harm to the character of the Countryside and the openness of the Countryside in this location;
5. the District Council have a proven five year housing land supply;
6. development should retain and support the character of Cotton as a rural village.
7. In accordance with the NPPF this application offers no economic, social or environmental role to the Parish of Cotton.

#### **County Council Responses (Appendix 4)**

##### **Highways**

No objection subject to conditions.

#### **Internal Consultee Responses (Appendix 6)**

##### **Environmental Health Land Contamination**

No objection.

##### **Arboricultural Officer**

This proposal would seemingly require the removal of a number of trees from site although such information has not been included with the application. Until we have these details it will not be possible to properly consider the implications and effects of this development. If a layout design is not yet available, then a Tree Survey and draft retention/removal plan can be provided with possible additional information required as part of reserved matters.

##### **B: Representations**

No representations received.

#### **PLANNING HISTORY**

None relevant.

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## **PART THREE – ASSESSMENT OF APPLICATION**

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### **1. The Site and Surroundings**

- 1.1. The site is located on the southern side of Blacksmith Road to the northeast of Bacton. The undeveloped site is heavily vegetated, with mature trees set behind a significant roadside hedgerow which extends the length of the site frontage. There is no vehicle access to the site from Blacksmith Road.

- 1.2. The site is immediately east of Blackthorn House, a recently constructed two storey dwelling built pursuant to planning permission DC/17/02809. This was approved at a time when the Council could not demonstrate a five-year housing supply.
- 1.3. Dwellings are to the north, located on the opposite side of Blacksmith Road, and include Blacksmith House, Burleigh, Smymar and Blacksmiths Cottage. The former Mechanical Music Museum is directly opposite, between Blacksmith House and Burleigh. To the south and east is open countryside, including the balance of the wooded area which the application site forms a part of, and open fields in arable use. Cotton Village Hall is 250m east of the site, at the junction of Blacksmith Road Mill Road and Wickham Lane.
- 1.4. There are no listed buildings in the vicinity of the site.
- 1.5. The rectangular site measures 0.10ha and is not subject to any formal landscape designations

## **2. The Proposal**

- 2.1. The application is made in outline, with all matters reserved, for a single dwelling. The application is not supported by any indicative development plans. The only detail lies in the visibility splay details that have been submitted, which indicates a vehicle access positioned midway along the site frontage.

## **3. Policy Context**

- 3.1. As an outline application for the erection of one dwelling, the proposal is assessed having regards to Mid Suffolk Local Plan (adopted 1998) saved policies GP1, H3, H7, H13, H15, H16, H17, T9, T10, CL8, and Core Strategy (adopted 2008) policies CS1, CS2, CS3, and CS5 and the Core Strategy Focused Review together with the NPPF (2021).
- 3.2. The application site is not within defined settlement boundary of Cotton, which in any case is a countryside village, and as such is classed as a countryside location under Policy CS1 of the Core Strategy Development Plan (2008). In countryside locations development will be restricted to particular types of development to support the rural economy, meet affordable housing, community needs and provide renewable energy. As such the proposal is for new residential development in the countryside, contrary to H7 of the Local Plan, and CS1 and CS2 of the Core Strategy.
- 3.3. The Council can currently demonstrate that it has an adequate 5-year housing land supply measured at 9.54 years. As such, this element does not engage the tilted balance requirement of the NPPF in itself. However, given the age of both the Core Strategy and the Local Plan, and given that they pre-date the publication of the revised NPPF, consideration must be given to their compliance with the NPPF and as such the associated weight of the policy. The question whether the presumption in favour of sustainable development is therefore engaged in the circumstances of this application needs to be considered.
- 3.4. Policies CS1 and CS2 jointly set out the spatial strategy for the district in directing how and where new development should be distributed. They are not expressly prohibitive of new development in the countryside and allow for new development that is in accordance with them. Read together the policies provide a strategy for the distribution of development that is appropriate in recognising local circumstances and their overall strategy remains sound. This is because they take a responsible approach to spatial distribution, requiring the scale and location of new development to take into

account local circumstances and infrastructure capacity. These elements are consistent with the NPPF.

3.4. Policy H7 states that new development will normally form part of existing settlements and that outside of settlement boundaries proposals for new housing will be strictly controlled. It is explained within the policy that this is in the interests of protecting the existing character and appearance of the countryside. It has been found that H7 does not directly preclude new development in the countryside; clearly, as a saved policy within the development plan it must be read alongside policies CS1 and CS2 and it is consistent with them. It is notable that the desire to protect the countryside as a resource is also reflected within the NPPF where it is stated at paragraph 174 that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside. Here, “recognition” must itself import a degree of protection and so the sentiment behind policy H7 is consistent with the NPPF.

3.5. As a matter of judgement, the generally restrictive approach to housing in the countryside set out within those policies are not entirely consistent with the NPPF, where development that is otherwise sustainably located and acceptable in other respects might nevertheless be refused if those policies were applied with full force. This position has been recognised in previous appeals, and the Council in approving other housing development even where a five-year housing land supply can be demonstrated. There is a not too dissimilar ‘special circumstances’ test at NPPF paragraph 80 but that only applies to sites that are physically separated or remote from a settlement. It is this policy approach (alongside paragraphs 78 and 79, among others) within the NPPF that is infringed by the proposal. Therefore, irrespective of whether elements of policies CS1, CS2, and H7 are out of date, the parts of those policies that are up to date are those which are being breached by the pre-application and directly apply to its consideration. These policies are consistent with the need to enhance and maintain villages and rural communities, and avoid new isolated homes, as set out within paragraphs 78, 79, and 80 of the NPPF.

Further, CS1, CS2 and H7 also reflect NPPF paragraph 105 which provides that the planning system should actively manage patterns of growth and focus significant development on locations which are or can be made sustainable.

3.6. Having established a housing land supply which demonstrably and significantly proves that the Council is boosting significantly the supply of homes it is considered that the management of new development to more rather than less sustainable locations is an important development plan purpose which is consistent with the thrust of the NPPF. Policies CS1, CS2 and H7 are “up to date” in so far as they apply to the circumstances of this application where the Council can show that it has demonstrably and significantly taken steps to boost significantly the supply of homes and where continued windfall piecemeal development in less sustainable countryside locations would materially compromise the spatial strategy of the Council and undermines the aims and objectives of those policies.

3.7. The NPPF sets out three dimensions for sustainable development, environmental, social, and economic.

The dimensions in the context of the proposed scheme are assessed in detail below.

### 3.8 Sustainable Development Considerations

The site is not part of Cotton settlement. Cotton is a small settlement and is approx. 0.5miles from the site, has no services and facilities. Bacton to the south-west, is a designated CS1 Key Service

Centre and has a range of services and facilities, it is situated less than 0.5 mile from the site. With regard the relationship that the site has to these facilities and services, the site sits in close proximity of the Bacton settlement boundary, which takes in Kimberley House to the east and runs south along the B1113. Whilst there are no footpaths running along Blacksmith Road, or along the B1113 until it reaches the junction with Pound Hill (which leads into the village), future occupants of the proposed dwelling would be able to access the Bacton facilities and services by cycle and there are bus stops at the site frontage which gives access to a daily bus service to Eye, Diss and Bury St Edmunds. It is noted that the bus service is limited in terms of the times in which it is available during the day. Notwithstanding the frequency of this service, the site benefits from access to some viable alternative methods of sustainable transport. Moreover, a single dwelling would not generate substantial daily vehicle movements and the day-to-day trips that would be undertaken would be short given the distance to Bacton.

- 3.9 Another impact environmentally is the landscape impact, further detail in this regard can be found under respective heading, however significant harm has been identified. The application site is dense with vegetation, a blanket green buffer together with the absence of any built form, contributes positively to the natural landscape character. The proposal would entirely erode this to make way for residential development. This harm is counted as environmental harm and negatively weighs in the planning balance.
- 3.10 In respect of the social strand, the proposal would produce a new dwelling which would provide a minimal contribution to housing, this is not an affordable unit therefore amount of public benefits is reduced. It is unlikely that any demonstrable public benefit will sufficiently materialise from the additional use of facilities in Bacton to sustain or enhance their vitality within the community. As such the social benefits are considered very limited and could be more sustainably provided in development elsewhere. This benefit is further reduced given that the Council can at this time demonstrate a five-year housing land supply. Whilst this is not a cap on development it is nonetheless the case that land for new homes is being made available in the District including within more sustainable locations, such that the benefit in this regard must be considered quite minimal.
- 3.11 Economically, the proposal would generate a minor benefit for local trade and predominately arise during the construction phase which would be short term and small. Once occupied, there would be minor economic benefit to the wider site itself, owing to the absence of facilities in Cotton. Again, the benefit to the community and society of the application in this regard is minimal.
- 3.12 The meaningful social and economic benefits here are limited (explored further under respective heading below). The environmental harm through loss of mature vegetation/trees is moreover a material disbenefit in all the circumstances. Taken in the round it is considered that the development would not on its own facts deliver on the three objectives for sustainable development set in the NPPF. Given the local plan policy position and performance of the proposal against the sustainability objectives of the NPPF, the principle of development is not supportable in this instance, all other material considerations are outlined below.

3.13 Self-build considerations

It is noted that the proposal is for a self-build scheme. The Housing and Planning Act 2016 describes *“In section 1 of the Self-build and Custom Housebuilding Act 2015 (register of persons seeking to acquire land), before subsection (1) insert—*

*“(A1) In this Act “self-build and custom housebuilding” means the building or completion by—  
(a) individuals,  
(b) associations of individuals, or*

*(c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals”*

3.14 The NPPF Section 5 Delivering a sufficient supply of homes states at paragraph 62:

*“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers<sup>27</sup>, people who rent their homes and people wishing to commission or build their own homes<sup>28</sup>).”*

3.15 Footnote 28 provides:

*“Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.”*

3.16 This clearly sets out the requirement to have regard to the proposal as self-build housing, and whether suitable permissions are available to meet identified demand.

3.17 The District has a Self-Build register of people interested in self-build or custom build projects, although the applicant is not on that list. However, the district’s website makes clear that individuals who wish to build on their own land, do not have to register on the district’s self-build register. Also, it makes clear that the proposals will be dealt with through the normal planning application process.

3.18 The Housing and Planning Act 2016, places a further duty to grant permission in respect of enough serviced plots of land to match the demand on their self-build and custom build register. The Housing and Planning Act sets out:

That demand is evidenced by the number of entries added during the base period;

An authority gives permission if it is granted by the authority, the Secretary of State, the Mayor of London or (in the case of permission in principle) by a development order in relation to land allocated for development in a document made, maintained or adopted by the authority;

Permission is considered suitable if the development could include self-build and custom housebuilding.

3.19 It is this last point that is of particular relevance as it turns upon the possibility, and not the certainty or requirement to specifically provide self-build plots, or that this is a specific requirement of a planning permission. Indeed, the consideration is that a development is suitable if the development could include self-build. Noting that the District Council has more than 9-year housing land supply, and that none of these consents preclude the delivery of self-build development all of these could include self-build development.

3.20 Self-build proposals are eligible for an exemption from Community Infrastructure Levy (CIL) payments. The Planning Practice Guidance identifies that these exemptions can be used as a means of calculating the number of relevant permissions granted, towards the requirement set by the 2015 Act (as amended by the 2016 Act).

Mid Suffolk CIL data shows that sufficient permissions have been granted in order to meet the relevant statutory duty to grant a number of permissions equivalents to the number of entries on the self-build register. The legislation allows three years to meet requirements. CIL exemption data shows that Mid Suffolk has met the requirement within one year for each self-build base period until the most recent base period which ended in October 2021. Were this proposal to be granted permission it would contribute toward meeting the demand arising from Base Period 6. However, Officers are of a view that the historic data suggests that requirements would be met even if this permission were refused, especially given this is just for one dwelling.

Base Period	New Entries on the Self-Build Register	Relevant Permissions Granted in year immediately following base period*	Conclusion
1. Before 30/10/16	22	60	Requirement met within 12 months
2. 31/10/16 – 30/10/17	66	71	Requirement met within 12 months
3. 31/10/17 – 30/10/18	55	106	Requirement met within 12 months
4. 31/10/18 – 30/10/19	44	71	Requirement met within 12 months
5. 31/10/19 – 30/10/20	36	73	Requirement met within 12 months
6. 31/10/20 – 30/10/21	63	24	Requirement not yet met, but deadline is 30/10/24. Furthermore CIL data is, in effect, retrospective as exemptions may not be sought until 3 years after the permission is granted.
7. 31/10/21 – 30/10/22	16**	n/a	TBC – only permissions granted from 31/10/22 – 30/10/25 relevant to meeting target.

\*Noting that the law allows three years.

\*\*As of August 22, meaning this figure is likely to be slightly higher as of 12/10/22.

As such an appropriate level of supply is considered to be provided, and a lack of supply is not therefore should not be a determinative factor.



#### **4. Design And Layout**

- 4.1 Policy CS5 requires development to be of a high-quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district.
- 4.2 Policy GP01 of the Local Plan states that proposals comprising poor design and layout will be refused, requiring proposals to meet a number of design criteria including maintenance or enhancement of the surroundings and use of compatible materials.
- 4.3 In this case, matters of design and scale are reserved, no information has been provided in this regard. As such thorough assessment will be carried out at Reserved Matters stage if Outline is approved.

#### **5. Landscape Character**

- 5.1. NPPF paragraph 130(c) states that planning decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. The NPPF states that local authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.2. Local Plan Policy GP1 calls for proposals to, amongst other matters, maintain and enhance the character and appearance of their surroundings. Policy CS5 of the Core Strategy seeks to protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encouraging development that is consistent with conserving its overall character.
- 5.3. The site is heavily vegetated. The mature trees and subsequent green canopy, together with the absence of any built form, contributes positively to the natural landscape character. The wooded area forms an integral part of the natural environment, complementing the semi-rural character of the area. The wooded site acts as a landscape buffer between the dwellings to the west and open fields to the east.
- 5.4. There are no development details supporting the application. It is unknown how much hedgerow would require removal to necessitate the vehicle access. The extent of vegetation removal required to facilitate the construction of the dwelling is an unknown. The scale of the dwelling is an unknown. Clearly the site is of sufficient size to readily accommodate a single dwelling. However it is unclear from the application as to how the development would be sited on the plot and therefore the extent to which the development would impact the local landscape character. The application has failed to demonstrate how it might take account of the natural environment. Some level of vegetation removal is inevitable and there is a strong likelihood that its removal would have high potential to adversely impact the character of the countryside and in so doing conflict with Policy CS5 of the Core Strategy. The lack of certainty around the proposal's ability to conserve local landscape character weighs negatively in the planning balance.

#### **6. Site Access, Parking And Highway Safety Considerations**

- 6.1. Access is a reserved matter and is therefore not for consideration. This said, it is noted that the Highways Authority does not object to the visibility splay details that have been provided, which indicates a vehicle access midway along the site frontage.

## **7. Residential Amenity**

- 7.1. As already noted, the site is of sufficient size that a single dwelling can be brought forward without unduly impacting neighbouring residential amenity. There is scope to adequately manage this matter at the reserved matters stage.

## **8. Biodiversity**

- 8.1. The NPPF chapter 15 requires planning authorities, when determining planning applications, to seek the conservation and enhancement of biodiversity by ensuring significant harm resulting from a development is avoided (through locating on an alternative site with less harmful impacts), or where not possible to be adequately mitigated, or, as a last resort, compensated for, and if this cannot be secured then planning permission should be refused.
- 8.2. Understanding protected species implications is required prior to determination in accordance with paragraph 99 of the ODPM Circular 06/2005, which advises that the presence or otherwise of protected species, and the extent to which they might be affected by the proposed development, must be established before planning permission is granted. Therefore, if there is a reasonable likelihood of protected species being present and affected by the development, the surveys should be completed and any necessary measures to protect the species should be in place before the permission is granted.
- 8.3. The heavily vegetated nature of the site is such that there is a strong possibility that it may contain protected species/habitat. The application is not supported by an ecology report. The application does not meet the above requirement, it is unclear whether the proposal preserves and enhances local biodiversity values, weighing negatively in the planning balance.

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## **PART FOUR – CONCLUSION**

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### **9. Planning Balance and Conclusion**

- 9.1. The proposed development is situated on land outside of the settlement boundary of Cotton and Bacton, the proposal fails to accord with the developments permitted within the countryside, contrary to Policies CS1 and CS2 of the Mid Suffolk Core Strategy (2008). The proposal is located in the countryside where the development of a new dwelling would not materially enhance or maintain the vitality of the rural community. Future occupants will, moreover, be likely to be reliant upon the private car to access services, facilities and employment. The District Council has an evidenced supply of land for housing in excess of 9 years and has taken steps to boost significantly the supply of homes in sustainable locations.
- 9.2. On this basis the proposal would not promote sustainable development and would be contrary to the adopted policies of the development plan which seek to direct the majority of new development to towns and key service centres listed in the Core Strategy 2008 with some provision to meet local needs in primary and secondary villages under policy CS1. In the countryside development is to be restricted having regard to policy CS2 and it is considered that in the circumstances of this application the direction of new housing development to more sustainable locations is of greater weight than the delivery of one additional dwelling in a less sustainable location. Having regard to the significant supply of land for homes in the District it is considered that the objectives of

paragraph 60 of the NPPF are being secured and that on the considerations of this application the objective to boost significantly the supply of homes should be given reduced weight.

- 9.3 It is considered that the development of this site would cause adverse impacts to the proper planning of the District having regard to the above mentioned development plan objectives to secure planned development in more sustainable locations rather than piecemeal development in less sustainable locations which significantly and demonstrably outweigh the limited benefits of this development.
- 9.4 Please note that findings and assessment of the proposal is in light of self-build status of the proposal, and that this does not change policy position and subsequently identified harmful impacts of the proposal as outlined within the report.
- 9.5 As such the proposal is not acceptable in principle, being contrary to paragraphs 8, 11, 193 and 196 of the NPPF, Policies CS1, CS2 and CS5 of the Core Strategy (2008), Policy FC1 and FC1.1 of the Core Strategy Focused Review (2012) Policies H7 and CL8 of the Mid Suffolk Local Plan (1998).
- 9.6 The application furthermore would result in harm on the character of the countryside, with loss of significant landscaping, and intrusion of built development. In addition, the proposal fails to demonstrate that there would not be an adverse impact on protect species or deliver biodiversity net gain. The proposal would be contrary to CL8 of the Mid Suffolk Local Plan (1998), CS5 of the Core Strategy (2008), Policy FC1 and FC1.1 of the Core Strategy Focused Review (2012)

## **RECOMMENDATION**

### **(1) That the Chief Planning Officer be authorised to REFUSE Planning Permission based on the following reasons:**

1. The proposal is in a countryside location where the development of a new dwelling would not materially enhance or maintain the vitality of the rural community. Future occupants will, moreover, be likely to be reliant upon the private car to access services, facilities and employment. The District Council has an evidenced supply of land for housing in excess of 9 years and has taken steps to boost significantly the supply of homes in sustainable locations.

On this basis the proposal would not promote sustainable development and would be contrary to the adopted policies of the development plan which seek to direct the majority of new development to towns and key service centres listed in the Core Strategy 2008 with some provision to meet local needs in primary and secondary villages under policy CS1. In the countryside development is to be restricted having regard to policy CS2 and it is considered that in the circumstances of this application the direction of new housing development to more sustainable locations is of greater weight than the delivery of one additional dwelling in a less sustainable location. Having regard to the significant supply of land for homes in the District it is considered that the objectives of paragraph 60 of the NPPF are being secured and that on the considerations of this application the objective to boost significantly the supply of homes should be given reduced weight.

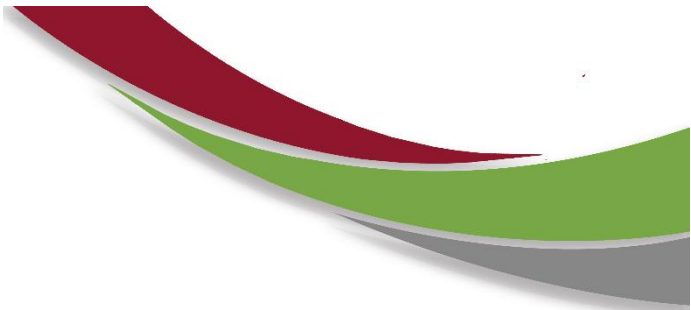
It is considered that the development of this site would cause adverse impacts to the proper planning of the District having regard to the above mentioned development plan objectives to secure planned development in more sustainable locations rather than piecemeal development in less sustainable locations which significantly and demonstrably outweigh the limited benefits of this development.

As such the proposal is not acceptable in principle, being contrary to paragraphs 8 and 11 of the NPPF (2021), Policy H7 of the Mid Suffolk Local Plan (1998), Policies CS1 and CS2 of the Core Strategy (2008) and Policy FC1 and FC1.1 of the Core Strategy Focused Review (2012).

2. The proposed development results in the imposition of built development into the open countryside in a location where this would result in significant impacts on the character and appearance of the countryside, failing to protect or conserve landscape qualities and adversely impact the character of the countryside. As such the proposal would fail to comply with the requirements of Policy CL8 of the adopted Mid Suffolk Local Plan (1998), Policy CS5 of the Mid Suffolk Core Strategy (2008), and chapter 15 of the NPPF (2018).
3. The application fails to adequately demonstrate that the proposed development would not adversely impact protected species and deliver biodiversity net gain. The proposal is therefore contrary to policies CL8 of the adopted Mid Suffolk Local Plan (1998), CS5 of the Mid Suffolk Core Strategy (2008) and chapter 15 of the National Planning Policy Framework 2021, the Conservation of Habitats and Species Regulations 2010 and the Natural Environment and Rural Communities Act 2006.

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

- Proactive working statement



# Application No: DC/22/01535

Location: Land At, Blacksmith Road  
Cotton, IP14 4QN

		Page No.
Appendix 1: Call In Request	<i>No</i>	
Appendix 2: Details of Previous Decision	<i>N/a</i>	
Appendix 3: Parish Council/s	<i>Cotton</i>	
Appendix 4: National Consultee Responses	<i>None</i>	
Appendix 5: County Council Responses	<i>SCC Highways</i>	
Appendix 6: Internal Consultee Responses	<i>Environmental Health (Land Contamination) Arboricultural Officer</i>	
Appendix 7: Any other consultee responses	<i>None</i>	
Appendix 8: Application Site Location Plan	<i>Yes</i>	
Appendix 9: Application Plans and Docs	<i>Yes</i>	
Appendix 10: Further information	<i>N/a</i>	

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



Babergh and Mid Suffolk District Councils  
Mahsa Kavyani

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From: Tina Newell <parishclerk@cotton-pc.gov.uk>  
Sent: 04 May 2022 11:11  
To: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>  
Subject: Comment URGENT

Good morning

Please would you upload the following comment on to application DC/22/01535.

Councillors considered this application and after discussion agreed to recommend REFUSAL for the following reasons: CS2 identifies the Countryside as the least preferable location for development, with development permitted only in exceptional circumstances subject to a proven justifiable need - the Parish Council undertook a consultation recently which confirms and justifies the need for cheap houses for younger families and properties for current residents to down-size into; CS2 also states countryside development will be restricted to defined categories in accordance with other Core Strategies none of which are relevant to this application; further to a local consultation, five years ago, residents offer strong support to development on Blacksmiths Road on a brownfield site; this application being considered is outside the settlement boundary and would cause harm to the character of the Countryside and the openness of the Countryside in this location; the District Council have a proven five year housing land supply; development should retain and support the character of Cotton as a rural village. In accordance with the NPPF this application offers no economic, social or environmental role to the Parish of Cotton

Many thanks

Best wishes

Tina

Tina Newell  
Parish Clerk Cotton

T: 07767 163706  
E: [parishclerk@cotton-pc.gov.uk](mailto:parishclerk@cotton-pc.gov.uk)

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Your Ref: DC/22/01535  
Our Ref: SCC/CON/1651/22  
Date: 27 April 2022  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto: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: Mahsa Kavyani

Dear Mahsa,

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/22/01535**

**PROPOSAL:** Application for Outline Planning Permission (All Matters Reserved) Town and Country Planning Act 1990 - Erection of 1 No. self-built detached dwelling with garage.

**LOCATION:** Land At, Blacksmith Road, Cotton, Suffolk, IP14 4QN

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

**Condition:** Before the access is first used, vehicular visibility splays shall be provided as shown on Drawing Ref. 'Visibility splays' with an X dimension of 2.4 metres and a Y dimension of 59 metres to the nearside edge of the carriageway and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

**Reason:** To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

**Condition:** No other part of the development hereby permitted shall be commenced until the new vehicular access has been laid out and completed in all respects in accordance with Suffolk County Council's standard access drawing DM01, with a minimum entrance width of 3 metres for a single access. Thereafter it shall be retained in its approved form.

**Reason:** To ensure the access is laid out and completed to an acceptable design in the interests of the safety of persons using the access and users of the highway. This needs to be a pre-commencement condition because access for general construction traffic is not otherwise achievable safely.

**Condition:** Prior to the development hereby permitted being first occupied, the new vehicular access onto the highway shall be properly surfaced with a bound material for a minimum distance of 5 metres measured from the nearside edge of the metalled carriageway, in accordance with details that shall have previously been submitted to and approved in writing by the Local Planning Authority.

**Reason:** To ensure construction of a satisfactory access and to avoid unacceptable safety risks arising from materials deposited on the highway from the development.



**Condition:** Before the development is commenced, details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles 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 in accordance with the current Suffolk Guidance for Parking (2019) where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety. This is a pre-commencement condition because it must be demonstrated that the development can accommodate sufficient parking spaces before construction works may make this prohibitive and in the interests of ensuring highway safety.

**Condition:** Before the development is commenced, details of secure, lit and covered cycle storage and electric vehicle charging infrastructure 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 of cycle storage and charging infrastructure for electric vehicles in accordance with Suffolk Guidance for Parking (2019).

**Note:** As per Suffolk Guidance for Parking (2019), ducting and a suitable consumer unit to allow for the installation of one EV charging unit should be provided per Class C3 dwelling.

**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 including any system to dispose of the water. 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. This needs to be a pre-commencement condition to avoid expensive remedial action which adversely impacts on the viability of the development if, given the limitations on areas available, a suitable scheme cannot be retrospectively designed and built.

**Condition:** Before the development is commenced, details of the areas to be provided for the storage and presentation for collection/emptying of refuse and 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 space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

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

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 Suffolk County Council or its agents at the applicant's expense.

Suffolk County Council must be contacted on Tel: 0345 606 6171.

For further information go to:

<https://www.suffolk.gov.uk/roads-and-transport/parking/apply-and-pay-for-a-dropped-kerb/>

or;

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

Suffolk County Council drawings DM01 - DM14 are available from:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/standard-drawings/>

A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

**Note:** Suffolk County Council's highway apparatus appears to be affected by this proposal. The applicant must contact Suffolk County Council, telephone 0345 606 6067 to agree any necessary alterations to be carried out at the expense of the developer.

Yours sincerely,

**Mohammedur Rashid-Miah**  
**Transport Planning Engineer**  
Growth, Highways and Infrastructure

**From:** Andy Rutson-Edwards  
**Sent:** 24 March 2022 07:33  
**Subject:** WK305230 DC2201535

Environmental Health - Land Contamination  
23rd March 2022  
Dear Sir/Madam

**APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/22/01535**

**Proposal:** Application for Outline Planning Permission (All Matters Reserved) Town and Country

Planning Act 1990 - Erection of 1No self build detached dwelling with garage.

**Location:** Land At, Blacksmith Road, Cotton, IP14 4QN

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge*

*Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*

9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

*Andy*

**Andy Rutson-Edwards, MCIEH AMIOA**

Senior Environmental Protection Officer

**Babergh and Mid Suffolk District Council - Working Together**

Tel: 01449 724727

Email [andy.rutson-edwards@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** David Pizzev  
**Sent:** 31 March 2022 15:10  
**Subject:** DC/22/01535 - OUT Land At, Blacksmith Road, Cotton

Mahsa

This proposal would seemingly require the removal of a number of trees from site although such information has not been included with the application. Until we have these details it will not be possible to properly consider the implications and effects of this development. If a layout design is not yet available, then a Tree Survey and draft retention/removal plan can be provided with possible additional information required as part of reserved matters.

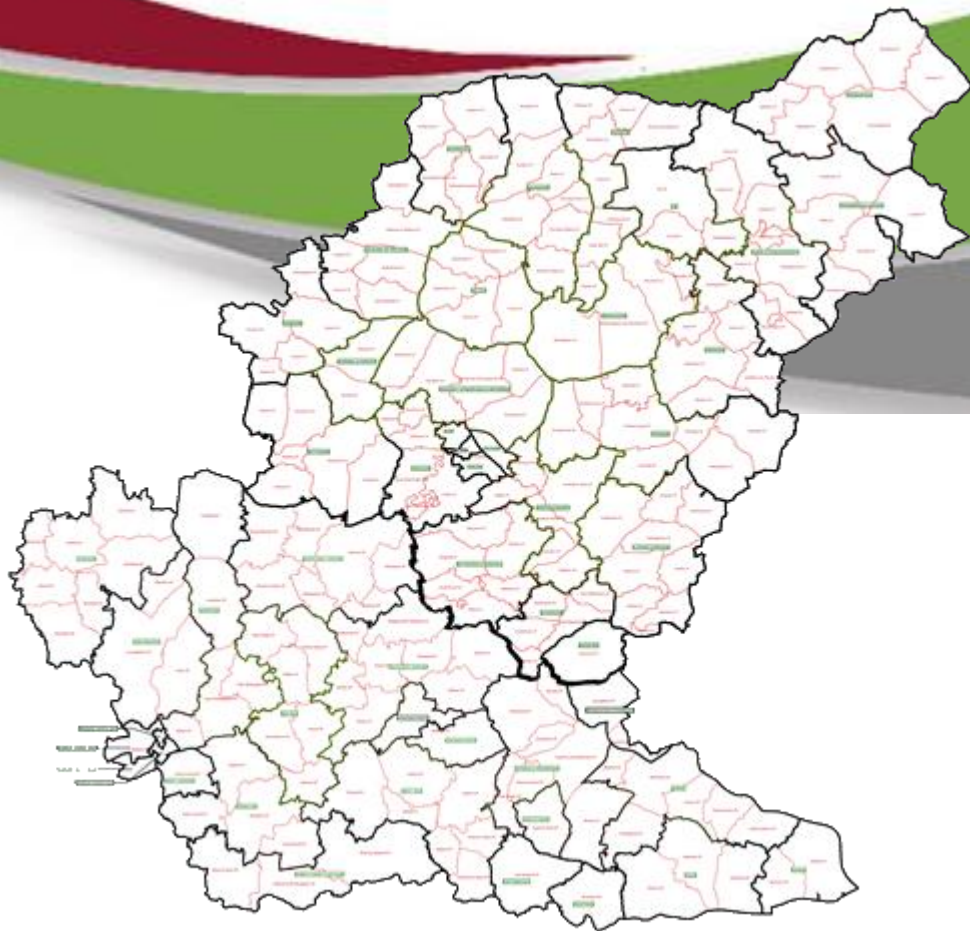
Kind regards

**David Pizzev** FArborA  
Arboricultural Officer

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**Application No:**  
DC/22/01535

**Address:**  
Land At  
Blacksmith Road  
Cotton





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## Aerial Map – wider view

Slide 3

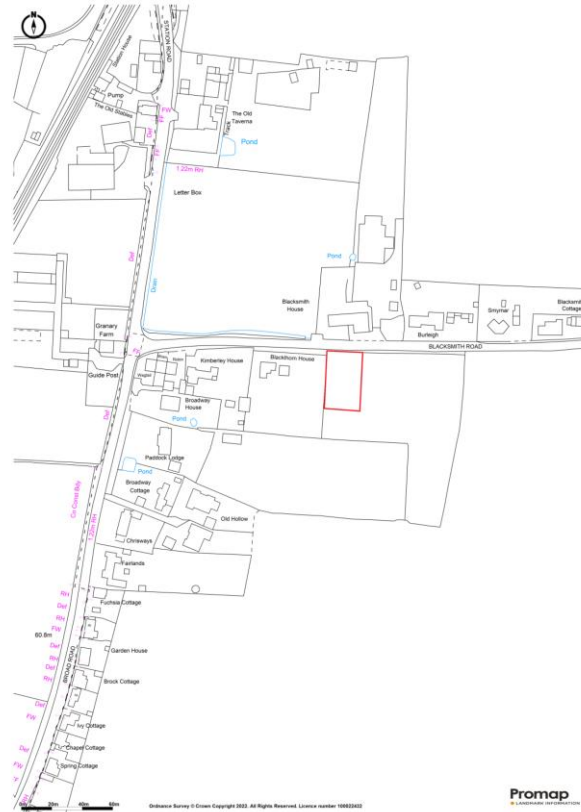


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**Phil Cobbold  
Planning Ltd**

42 Beatrice Avenue Felixstowe IP11 9HB  
 info@philcobboldplanning.co.uk  
 www.philcobboldplanning.co.uk  
 01394 275431

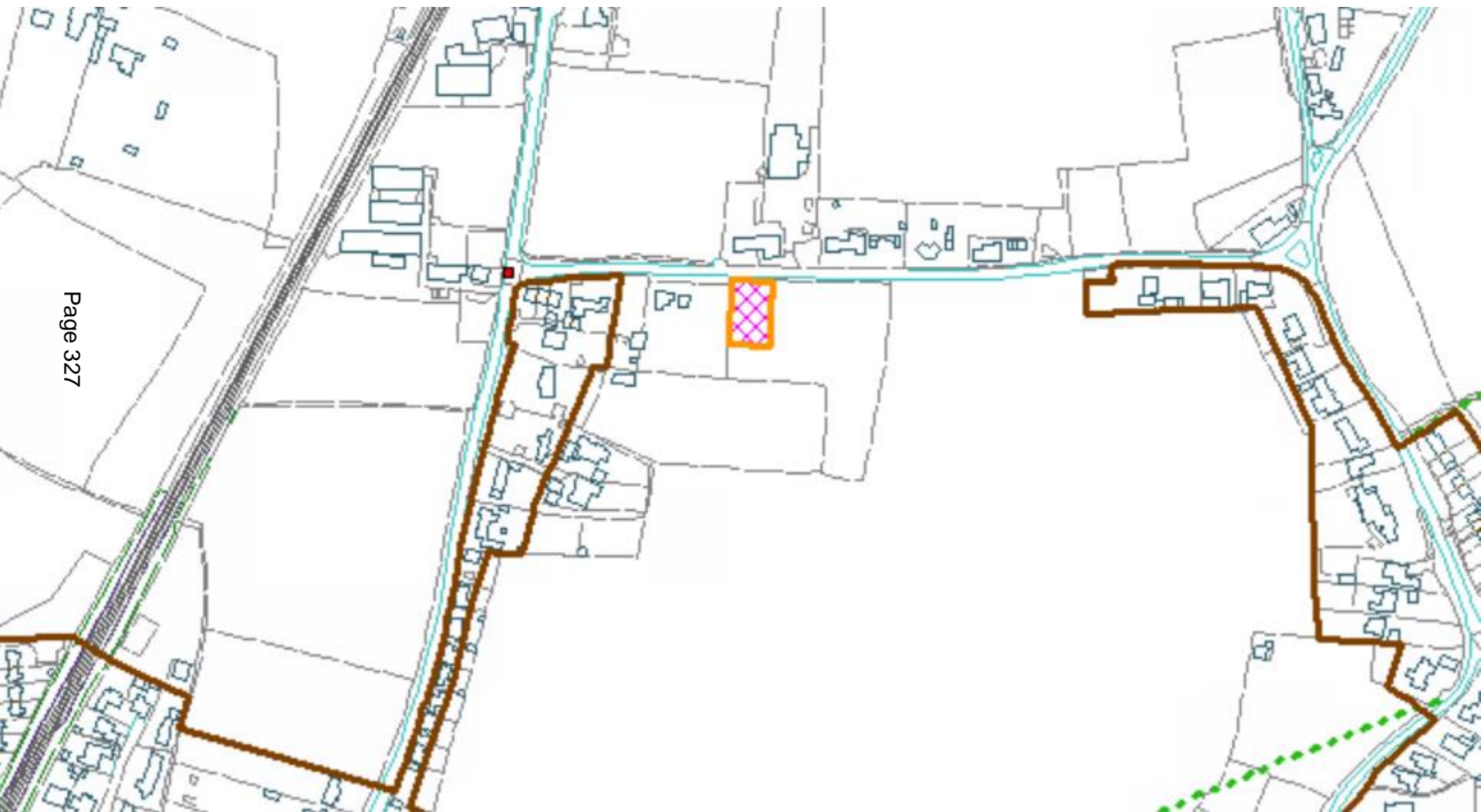


**ERECTION OF DETACHED DWELLING WITH GARAGE (SELF BUILD)  
 LAND AT BLACKSMITH ROAD, COTTON.**  
 LOCATION PLAN SCALE 1:250

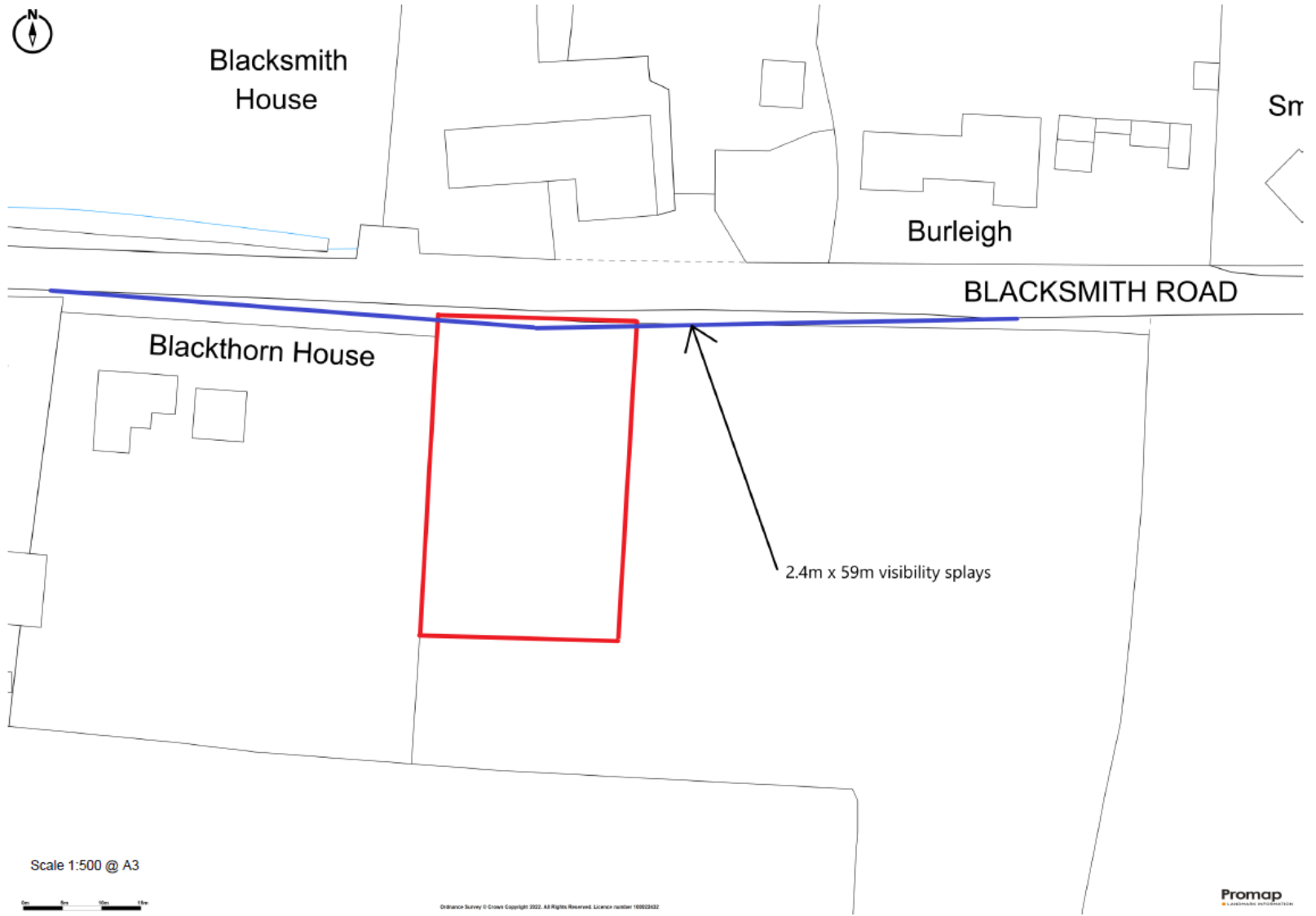
## Constraints Map

- ..... Footpath
- Built Up Area Boundaries

Slide 5



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Scale 1:500 @ A3

