

From: Michelle Marshall [mailto:Michellelm@stowmarket.org]
Sent: 25 June 2018 15:08
To: BMSDC Planning Mailbox; BMSDC Planning Area Team Blue
Subject: Planning applications

Hello,

Please see below for comments from Stowmarket Town Council in respect of recent planning applications.

DC/18/02380

The Town Council opposes the grant of planning consent due to the following:

- i) That, contrary to planning policy HB1, the site is within the setting of the Grade I listed Church of St Mary and the proposal would have a negative impact on the setting of the church;
- ii) That, contrary to planning policy HB1, The Church of St Mary would be made more isolated from the parish which it serves if the proposed development were to be approved;
- iii) That, contrary to planning policy HB1, the proposed development would detract from the view of the Church of St Mary from the parish of Combs;
- iv) That contrary to planning policy T10, the increase in traffic movements along Poplar Hill at Combs Ford will have a detrimental impact upon highway movements and safety.

DC/18/02398

No objection be raised to the grant of planning consent, however, the Town Council wishes to record its disappointment that the number of pupils which will the new school building will cater for, has not been increased from the number of pupils which the existing building caters for.

DC/18/02568

No objection be raised to the grant of planning consent.

DC/18/02632

No objection be raised to the grant of planning consent.

Kind regards,
Michelle

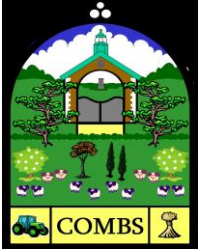
Michelle Marshall
Deputy Town Clerk

Stowmarket Town Council
Milton House | Milton Road South | Stowmarket | Suffolk | IP14 1EZ

01449 612060 | michellelm@stowmarket.org | www.stowmarket.org



[@stowmarketTC](https://twitter.com/stowmarketTC)



COMBS PARISH COUNCIL

c/o Tony Bamber, Parish Council Clerk
Adstone, Bildeston Road, Combs, Suffolk IP14 2JZ
Tel: 01449 613255
Email: combsparishcouncil@gmail.com

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

6 July 2018

Dear Sirs

Planning Application DC/18/02380
Land to the east of Poplar Hill

I refer to the above application for outline planning permission and herewith submit an objection on behalf of Combs Parish Council on the grounds that the proposed project will not be *sustainable* development.

We acknowledge that this country needs more houses, that Mid Suffolk is behind in its five-year stock of developable land, and therefore the restrictive elements of MSDC's existing development plans are deemed to be out of date. We also acknowledge that this parish must play its part in the necessary sustainable development, and that may mean not only embracing appropriate development within our own boundaries but also accepting the inevitable changes when development occurs within our neighbours' boundaries.

However, the proposed development is not sustainable for two principal reasons:

- A. it will depend for its access to all the facilities that the residents will need on a road system (Poplar Hill) which cannot, at peak times, take much more traffic than it does already before it ceases to function altogether;
- B. its location will diminish the strategic gap between Stowmarket and Combs to an unacceptable and unsustainable level.

A. Access between the Site and the facilities of Stowmarket and beyond.

A.1 This planning application includes and relies on a comprehensive Transport Assessment and a Travel Plan, both of which in our view are fundamentally defective because they take an unrealistic and over-optimistic view of Poplar Hill as the main arterial route between the development and all the facilities its residents will need. As a result of taking an ill-informed and facile approach, both the Transport Assessment and the Travel Plan find themselves able to say:

3.3.1 Poplar Hill is a two-way single carriageway road and provides a connection between Combs Ford and Stowmarket to the north, and through to Combs and Moats Tye to the south...

3.3.3 The speed limit on Poplar Hill varies over its length between 20mph and 30mph. The 30mph speed limit is enforced [*sic*]from the Park Road/Tannery Road junction up until the junction of Webb Road where it becomes 20mph with traffic calming in the form of speed bumps and a narrowing of the carriageway at the junction with Webb Road. The 20mph speed limit then continues up until the mini roundabout with Combs Lane where the 30mph speed limit is reintroduced for the c180m to the junction with Ipswich Road.

A.2 The Travel Plan goes on to describe the frontage to the site and Church Road, all the sustainable modes of transport (walking, cycling, bus), and Section 5 concludes with this summary:

5.6.1 This section of the report has demonstrated that the site is in a sustainable location...

A.3 In our view this is a simplistic conclusion, based on a simplistic analysis of simplistic data derived as a result of a fundamental misunderstanding of the rather more complex traffic flow system from the top (in terms of height above Ordnance Datum) of Poplar Hill, where the proposed Site entrance would be, to its northern end where Poplar Hill meets Combs Lane.

A.4 Paragraph 3.3.1 of the Travel Plan and the Transport Assessment may technically be correct, that Poplar Hill is a two-way single carriageway road, but we who live here know that for a significant part of its length it is in effect a single-track road because of the vehicles parked along its southeastern side. Never have we seen it clear of at least a handful of parked vehicles; usually the stretch that is subject to the 20 mph speed limit and traffic calming speed bumps is well populated with parked cars or vans, and at the busier times of day the traffic on the 'give way' lane (going uphill) can barely get a look-in because of the traffic flow coming down. Sometimes that flow is of single cars with substantial gaps between them, but the gaps are just too short for a 'give way' car to risk trying to make it to the next gap in the parked cars.

- A.5 This results, for cars and small vans at least, in high acceleration and weaving, taking what would normally be barely acceptable risks and ignoring the rare cyclist who is prepared to risk the speed bumps of Poplar Hill. The situation is much worse for heavier vehicles, for example tractors (we are a farming community), bulk lorries (especially at harvest time or when the sugar beet is lifted), flatbed lorries or tractors & trailers returning southwards to pick up physically large cargoes of straw bales, and the Akzo Noble lorries from the PPG Industries depot in Needham Road (and other HGVs) on their way to be maintained at the lorry maintenance depot at the southwest end of Bildeston Road. They either have to wait interminably, or stop the flow of ‘right-of-way’ traffic coming downhill if they are to make any headway at all.
- A.6 The other result is that much traffic now, as a matter of course, chooses to avoid that bottleneck altogether, and travels north along Verneuil Avenue and Edgecomb Road, or south along Lavenham Way, Hillside and Church Road. Those roads, which service the dense residential housing constituting much of Combs Ford, are now an integral part of the traffic flow system between the settlements and businesses south of Stowmarket – Combs, Moats Tye, Little Finborough, Battisford and Battisford Tye, Ringshall and Wattisham (including the RAF/AAC base) – and the facilities and amenities of Combs Ford, Stowmarket and the A14.
- A.7 We find it astonishing that the Transport Assessment and Travel Plan in this application barely mention those other roads, much less demonstrate an appreciation that they are integral parts of this more complex traffic flow system. From local knowledge and our own experience we know that the rat-run down Verneuil Avenue is under increasing pressure at busy times of the day from just Phase I of the Edgecomb Park/Farriers Road development, a mere 75 houses (only partly completed and occupied), mostly bungalows and therefore presumably occupied by people less likely to be travelling to and from work. We dread what it will be like when Phase II is being built and then occupied – a further 110 houses; we understand detailed planning permission will be sought later this summer.
- A.8 Curiously, the developers of Edgecomb Park came up with a substantially more realistic assessment of Poplar Hill, as they pointed out in their Development Brief submitted under planning reference 1492/15:
- 6.4 Poplar Hill is an important local distributor road providing access into Stowmarket from Combs and other rural settlements located to the south of the town. Poplar Hill also forms the principal road link into the town from the residential area located in the south of the town. Towards its northern end Poplar Hill is flanked by older residential properties which have no off-street parking and therefore some on-street parking takes place although there are double yellow line restrictions in place, particularly close to road junctions. In addition, there are road humps, a gateway chicane feature close to the junction with Hill Rise and a 20mph speed restriction designed to reduce vehicle

speeds. All of these features slow traffic and can create a perceived feeling of local congestion in this area, particularly during peak hours. **It is for this reason that the highway authority would wish to limit the size of the development served from Poplar Hill to around 50 units together with the sheltered/supported housing** (*emphasis added*).

- A.9 This is a substantially more accurate description and analysis of Poplar Hill and its traffic flow, and we urge the Planning Referrals Committee to be persuaded by this description, and to note particularly the sentence which we have highlighted in bold.
- A.10 The Transport Assessment and Travel Plan are also substantially flawed in our view because they clearly fail to understand that Poplar Hill is a hill, one which involves a significant gradient. In a linear distance of no more than 800 metres the land rises at least 20 metres which, to a cyclist or a walker on his way back from all the facilities he has been encouraged to cycle or walk to, is quite some climb, as we who have done it can confirm. Of course, to an HGV it is nothing: they just belch out more noxious fumes as they pull away round maybe a single parked car, only to have to stop and wait for clear road at the next parked car, and then pull away again.
- A.11 Verneuil Avenue/Edgecomb Road and Lavenham Way/Hillside are little better as arterial routes for ever-expanding development to the south of Stowmarket. They are heavily residential, vehicles are parked constantly along one or both sides, and frankly it will not take much more before a tragic accident occurs.
- A.12 It should also be noted that this already poor situation is exacerbated when there are roadworks anywhere nearby. During the recent closure of Combs Lane unsustainable volumes and types of traffic diverted themselves (regardless of diversion routes carefully planned by the highways authority) along wholly unsuitable minor lanes, such as Jacks Lane, and via Battsford/Mill Road and Luckey's Corner, if they needed to get to the Finborough Road. This is yet further indication that this network of roads and lanes should be regarded as a single system, and that the observations and analysis contained in the Transport Assessment and Travel Plan are over-simplified and unreliable as a tool for forecasting.

Road Safety

- A.13 Section 3.5 of the Transport Assessment is headed 'Road Safety' and discusses personal injury accident data for the 5 years from 2012 to 2017. Section 3.6 is headed 'Accident Summary':

3.6.2 Given that all of the accidents were attributed to either driver or pedestrian error, there is nothing to suggest that highway layout or design were contributory factors.

3.6.3 It is therefore considered that there are no deficiencies in the highway network, or existing safety issues in the vicinity of the site that would be exacerbated by the development proposals.

A.14 While there may be nothing wrong with the highway layout or design, common sense tells us that a substantial increase in traffic flow (and the increase will be substantial as another 310 houses-worth of traffic are added over the next 5 years – see below) will bring with it more ‘driver or pedestrian errors’, resulting in a proportionate increase in personal injuries. Given that a child was killed on Poplar Hill some ten years ago on a stretch outside the 20mph traffic calming measures, when can we expect the next child death? If yet more traffic in substantial numbers is added it will bring ever closer that appalling prospect.

Sustainable transport: walking, cycling, bus

A.15 The Travel Plan (and also the Transport Assessment, but under different paragraph numbers) notes that many factors are involved when human beings decide whether or not to use sustainable modes of transport:

2.6.1 This document [*‘A Strategy for Improving Sustainable Transport Integration’ (2013)*] prepared by the DfT, is part of the Improving Local Transport Policy and outlines the Government’s goal for more journeys to be made by sustainable transport which it sees as being essential for reducing transport related carbon emissions.

2.6.2 It goes one step further ... by stating that sustainable transport modes must be made more attractive not just for part of the journey, but for the entire journey. It then states that it ‘must be as convenient or straightforward to make a door-to-door journey by public transport, by bike or on foot, or by combining these different elements, as by private transport’, so the focus needs to be on the whole journey.

5.2.2 Research has indicated that acceptable walking distances depend on a number of factors, including the quality of the development, the type of amenity offered, the surrounding area and other local facilities.

A.16 The Travel Plan then goes on to quote CIHT-suggested distances and times from the Site to the retail, health, leisure, employment and other amenities of Combs Ford and Stowmarket (Tables 5.1 and 5.2 for walking, and Table 5.3 for cycling). Despite the somewhat casual and dismissive analysis of speeds of cycling and the optimistic conclusions that everywhere and everything is comfortably within walking and cycling distance, it may be – once, but after the last uphill half-mile on the return journey we suggest that many residents of the proposed development will jump into the car for preference. We speak from experience on this point.

A.17 As already pointed out above, Poplar Hill is a hill; so are Verneuil Avenue and Hillside/Church Road, the alternative routes to Poplar Hill itself. Our local knowledge and experience tell us that there are remarkably few cyclists who go up or down those roads, except for the occasional cyclist who, by his attire, is obviously out for a ride which falls into the category of ‘exercise and leisure’. As things stand at present, we have over the years seen very few cyclists using the Poplar Hill and associated system for what one might call functional transport. We cannot for certain say why this might be, but the most obvious guess is that if you cycle down to the bottom of Combs Ford, you only have to cycle (or walk, pushing your bike) all the way back up again, fighting against the right-of-way downhill traffic.

A.18 What seems to have been forgotten throughout the Transport Assessment and the Travel Plan is the gradient involved for walkers and cyclists. A 20-minute stroll on easy flat ground is a very different affair from a stiff-ish climb, particularly at the end of a working day, or with the shopping from supermarkets in Combs Ford or Stowmarket.

A.19 We only point this out because the Travel Plan states, when forecasting trip rates and trip generation for 160 homes:

6.2.5 It should be noted that no allowance has been made for any future reduction in car travel based on any increased use of sustainable modes of travel, therefore the trip generation figures can be described as robust.

A.20 As we have shown above, placing a housing development at the top of a hill is likely in the long run to result in minimal to negligible use of sustainable modes of transport. Accordingly, the trip generation figures, far from being ‘robust’, should be treated with the same caution as any other forecast.

A.21 Apart from children walking to and from the two primary schools in Combs Ford, it seems to us that, principally because of the hill, most journeys to and from the proposed site will be accomplished by car. We cannot demonstrate this scientifically or by reference to CIHT-suggested transport models, but many years of experience and local knowledge suggest very strongly to us that this will be the case.

Modern shopping practices – home deliveries

A.22 The Travel Plan states:

7.2.5 ...the emergence of home deliveries from large supermarkets and online retailers has the potential to further reduce the need for travel.

A.23 Although there may theoretically be the potential, we would disagree (should anyone suggest it) that there is any likelihood of a reduction in overall road journeys. While online shopping may replace a return journey by private car with a single journey by a delivery van (assuming that van goes on to make multiple other deliveries in the immediate area, which may not always be the case), the van will be much larger than a car, and will inevitably be diesel with all its polluting exhaust fumes where the car may be petrol. In addition, a single return journey out from and back to the Site by a resident may accomplish a number of purchases which would take a number of journeys by a delivery van, and as many of us know from our own experience, with the ease of online shopping we are inclined to make more purchases (resulting in more delivery journeys) than we used to make in times past. As a consequence, in our view, the volume of traffic up and down Poplar Hill will thus not be diminished, and the bottleneck will remain, or even made worse by virtue of vans replacing cars, and quite possibly more journeys than otherwise would have been the case. Far from online purchasing reducing total vehicle journeys, we suggest that there is at least an equal chance that it will encourage *more* vehicle journeys, and by larger vehicles than a resident's car.

Cumulative effect – the Edgecomb Park Development

A.24 Only part of Phase I is complete, amounting (as far as we are able to ascertain) to no more than 30 new homes occupied so far. There are a further 40+ homes yet to be completed and occupied. Phase II will bring the traffic from another 110 homes. If the subject application is approved, this will bring the road traffic from a further 160 homes, cumulatively **310** more homes, than there is at present down the Poplar Hill and associated roads arterial system. Those of us who already struggle with the Poplar Hill system traffic simply cannot comprehend what this will mean in practical terms – grid lock? more casualties for the few brave cyclists who risk it at the moment? another child's death?

A.25 Section 6 of the Transport Assessment uses data collected from observation of off-site *junctions* and precise mathematical models for predicting the traffic at those junctions for 2023, and concludes:

6.16.2 It has been demonstrated that the proposed site access and all off-site junctions would operate with spare capacity and would therefore be able to accommodate the traffic likely to be generated by the development.

A.26 Leaving aside that it is not just the *junctions* that need to be considered but the entire bottleneck system including its overspill routes, common sense and our local knowledge and experience tell us that adding the road traffic generated by an additional 310 homes beyond what there is now will very likely bring the whole arterial system from the Site to Stowmarket to a standstill at the busier times of day. Accordingly, we consider that the conclusion in paragraph 6.16.2 of the Transport Assessment is unrealistic and grossly over-optimistic.

Conclusion

A.27 The Transport Assessment sets out its overall conclusions in Sections 6 and 7:

6.16.3 The residual cumulative impact of the development cannot be considered ‘severe’ meaning that according to paragraph 32 of the NPPF ... the development should not be refused on transport grounds.

7.2.2 Considering such ‘adverse impacts’, in accordance with paragraph 32 of NPPF, it ... [can be] demonstrated, within Section 6, that the impact of development-generated traffic on the local highway network would be minimal.

7.2.3 Paragraph 32 [of the NPPF] concludes by stating that ‘development should only be prevented or refused on transport grounds where the residual cumulative impacts of the development are severe’. This report concludes that the proposals would not have an adverse impact of safety and only a negligible impact in highway capacity terms. Therefore, it is concluded that there are no highways or transportation related reasons why planning permission should not be granted.

A.28 We have shown that many things about the Transport Assessment and the Travel Plan are inadequate, simplistic and unrealistic, resulting in assessments which, we suggest, arise from an excess of enthusiasm to demonstrate that all will be well with the proposed development. As we point out above, a much more realistic assessment of Poplar Hill may be seen in the Development Brief for Edgecomb Park.

A.29 For all the reasons we have set out in this letter, the additional traffic generated by this development – even if not by the completion of Edgecomb Park alone – will most likely bring the traffic flow through the Poplar Hill bottleneck and its overspill routes to crisis point at the busier times of day. As a consequence, we submit, the residual cumulative impacts of the Edgecomb Park development and this proposed development *would* be severe, and so this planning application should be refused precisely on the transport grounds referred to in paragraph 32 of the NPPF.

A.30 Unless and until something radical is done to sort out the bottleneck in the lower (northern) portion of Poplar Hill, it would be sheer madness to pile more and more traffic onto Poplar Hill from housing developments that must necessarily depend for their access to all the facilities which are supposed to serve them on an already inadequate arterial route.

A.31 Accordingly, the proposed development would be contrary to the principles of paragraph 32 NPPF and would fail to conserve or enhance this part of the District contrary to policies FC1 and FC1.1 of the adopted 2012 Core Strategy Focused Review.

*

B. Maintaining a gap between Combs and Stowmarket

- B.1 The gap between the clear built-up areas of Stowmarket (Church Road in Combs Ford) and Combs (Prospect Place) is currently about 460 metres at its narrowest. The crucial view is from the perspective of a traveller (whether on foot, bicycle or in a car) leaving the village of Combs at the junction of Park Road, Tannery Road and Poplar Hill, as he looks along Poplar Hill to the next settlement: Stowmarket and its suburb (as it is called in the Landscape and View Assessment) of Combs Ford. The view is across a landscape which is in effect a basin formed by an ancient stream – now little more than a ditch. The bed of that stream runs from the crest of the hill north of Combs in an easterly direction for about 500 metres, crosses Poplar Hill at the bottom of a dip known locally as the Slough, and continues for another 150 metres until it joins the stream running northeast towards the Rattlesden River and then into the River Gipping.
- B.2 The significance of this ancient stream is that it has given what would otherwise have been an east-southeast-facing slope a more southerly aspect, creating a small basin, across the contours of which the main arterial road between Combs and Stowmarket (Poplar Hill, southern end) runs. The effect of this is that, as the traveller crosses this basin he sees the whole of it as a single feature.
- B.3 Church Road, some 500 metres distant from the edge of Combs (as seen from the junction of Poplar Hill with Park Road and Tannery Road), is far enough away to define the edge of Combs Ford and gives the perception of being a ridge, although that is only a perception. But at 500 metres distance it is not seen as ‘threatening’.
- B.4 But if development were to spread southeastwards down the very visible slope of this small basin, the effect would be devastating.
- B.5 As noted above, the present separation is 460 metres at its very narrowest; but if this development were to be approved that gap would reduce to about 280 metres to the nearest line of houses, the whole spread of the development occupying that critical view of clear, undeveloped land on the southeast-facing slope of the basin.
- B.6 The applicants refer to this in their Planning Statement:
- 4.5.10 Of note is [SAAP] Policy 6.22 – Landscaping, setting and views which requires future development on the site [referring to Edgecomb Park] to address the need to protect the landscape and maintain the separation between Stowmarket and Combs, the protection on the skyline of any development at the ridgeline along Poplar Hill, the need to retain the existing mature trees and hedgerows in the area, the impact on 19 long distance views and possibility of screening as well as the provision for on-site public open space.

4.5.11 This was echoed in the pre-application advice and has been taken into account in the design of the scheme. The physical separation between Stowmarket and Combs is reduced through the [proposed] development but a substantial landscape buffer is being put in place to maintain the separate entities of the settlements themselves. The majority of trees and hedgerows are retained on site with additional planting included as part of the scheme. The new development will be viewed within the existing residential context of Combs Ford and will therefore result in Minor Adverse effects on completion where there are views from Combs.

B.7 We disagree in the strongest possible terms. Leaving aside the aesthetic appreciation of this small topographic basin, what is of very substantial concern to us is that, if development is allowed to spill over Church Road into this basin, this clear feature will cease to have the effect of a being a sustainable gap between two settlements. Unlike the curate's egg, this basin will be blighted irredeemably, allowing future planners and planning committees to shrug their shoulders and say, 'The harm has already been done'. It will therefore not be long before the remaining 280 metres (even remembering that 100 metres of that is designated Open Space which, as we see from this present application, would soon turn to houses anyway) becomes mere 'infill', and the village of Combs becomes a suburb of Stowmarket in much the same way that Combs Ford has.

B.8 The Planning Referrals Committee will recall that a constant theme running through the Edgecomb Park application (reference 1492/15) was preservation of the skyline to the north of Combs, and the separation of Combs from Stowmarket. The Planning Statement from that application (1492/15) was clear:

4.22 ...The plan highlights the sensitivity of the landscape and separation between Stowmarket and the nearby village of Combs. The SAAP highlights the importance controlling the visual impact and respects the visual setting...

4.23 The development addresses the requirements set out in policy SAAP 6.22 in respect of landscape setting and views for the following reasons: ...

- The development is comprised entirely of single storey dwellings, minimising the visual impact, fulfilling criterion 2 in order to protect the views of the ridgeline on Poplar Hill.
- The development proposals make provision for 1.9 ha open space on land to the east of Poplar Hill, to comply with criterion 6.

B.9 Later in that Planning Statement it is pointed out (paragraph 6.43) that the proposed 'Public Open Space and Play Space' is an integral part of their proposed development because it complies with SAAP Policy 10.2 which seeks to ensure that 'every home is within 300 metres of at least one accessible green space of 2 hectares'. It is no part of our brief to point out that

if the present application were granted it would necessarily mean that Edgecomb Park would thereby become non-compliant, but the loss of that Open Space *in that precise location* and its replacement by housing would be of the greatest possible concern to us.

Does the NPPF recognise gaps between settlements?

B.10 The SAAP states:

Maintaining a gap between Combs and Stowmarket

6.50 [Referring to the allocated development land between Poplar Hill and Farriers Road], the feeling of openness and long distance views from the top of Poplar Hill looking South and West will need to be maintained. Suggested open space provision will help in this process.

B.11 Sections of the NPPF that support a ‘Gap policy’ include:

- Paragraph 17, which sets out various core planning principles which should underpin both plan-making and decision-taking. It states, among other things, that planning should: *‘take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it’*, and *‘contribute to conserving and enhancing the natural environment and reducing pollution...’*
- Paragraph 61, which requires that *‘Planning policies and decisions should address ... the integration of new development into the natural, built and historic environment.’* Consistent with this, paragraph 109 of the NPPF makes it clear that the planning system should *‘contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes’*.
- Paragraph 156, which states that the Local Plan should have policies to deliver conservation of the natural environment, including landscape, and at paragraph 157 the NPPF requires Local Plans to *‘identify land where development would be inappropriate, for instance because of its environmental ... significance.’*

B.12 National Planning Practice Guidance which provides additional guidance on how the NPPF should be applied states that *‘one of the core principles in the NPPF is that planning should recognise the intrinsic character and beauty of the countryside. Local Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes, but also the wider countryside’* (PPG - Natural Environment Paragraph: 001 Reference ID: 8-001-20140306).

B.13 The Planning Inspectorate has specifically endorsed Local Plans that *‘identify land where development would be inappropriate, for instance because of its environmental significance.’ ... ‘The coalescence of adjoining settlements, caused by development in the largely undeveloped gaps, would clearly have an environmental effect’*, concluding that *‘The principle of such a designated area is therefore in line with national policy’* (PINS/C1760/429/5, page 31, paragraph 191).

B.14 With reference to the NPPF, in one case the Inspector noted, *‘This [gap] policy, which is broadly restrictive in nature, runs counter to the general national approach to enabling development. However that approach is qualified by the [NPPF] policy that such development should be located in the right place, and that the natural environment should be protected’* (Ref: PINS/C1760/429/5, page 31, paragraph 194).

B.15 In our view the existing gap between Combs and the edge of Combs Ford is a gap of the right size and sustainable proportions for the following reasons:

- The land lies between settlements
- The land is predominantly undeveloped
- The land is predominantly open
- The land has a coherent land management pattern
- The land has clearly defined boundaries
- The land includes a public road which provides a transition from one settlement to another
- The individual settlements show a distinctive character/urban form and have a clear urban edge.

Conclusion

B.16 In view of the above, we submit that:

- i) a policy of maintaining gaps between settlements is not only consistent with the NPPF but also endorsed by it;
- ii) the present gap between Combs and Stowmarket is right and sustainable;
- iii) the proposed development would reduce the open countryside separation between Combs and Stowmarket to unsustainable proportions and would fail to recognise the intrinsic character of the countryside and our village, contrary to NPPF paragraph 17, and would accordingly fail to conserve or enhance the local character of this part of the District contrary to policy FC1.1 of the adopted 2012 Core Strategy Focused Review.

Summary

We consider that the proposed development is not *sustainable* development because:

- a) it would cause unsustainable traffic congestion on Poplar Hill; and
- b) it would reduce the separation between settlements (Combs and Stowmarket) to an unsustainable level,

each of which is sufficient reason on its own, and we ask the Planning Referrals Committee to refuse the application.

Yours faithfully

Tony Bamber, Parish Clerk
On behalf of Combs Parish Council



Historic England

Ms Gemma Walker
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582740

Our ref: P00941211

16 August 2018

Dear Ms Walker

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE EAST OF POPLAR HILL, STOWMARKET, SUFFOLK IP14 2EJ
Application No. DC/18/02380**

Thank you for your letter of 7 August 2018 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

In our letter of 12th July we raised concerns regarding the harmful impact the proposals would have to the significance of the grade I listed Church of St Mary's through development in its setting. The proposed development would bring modern development further out into the open countryside surrounding Stowmarket. The proposed location contributes to the significance of St Marys Church as it reinforces its rural setting. It also forms part of the separation between the two settlements of Stowmarket and Combs.

We consider this harm to be less than substantial however, the National Planning Policy Framework (which has been revised since we last commented on the application) states 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 and the more important the asset the greater the weight should be, irrespective of the level of harm (paragraph 193). In this instance we would stress that the building is listed at grade I putting it in the top 2.5% of listed buildings nationally. Paragraph 194 states that any harm to the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Paragraph 196 states that where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.

It is not for Historic England to weigh this balance and therefore we would leave it for your Council to weigh the harm against any public benefits. However, we consider that a reduction in the number of dwellings in line with our previous comments would



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

significantly reduce the harmful impact on the Church of St Mary and maintain our position that your Council seek amendments of the proposals.

Recommendation

We do not consider that the amendments have addressed our concerns and therefore refer the Council to our previous recommendation. I hope this has clarified our position.

If you wish to discuss anything further please do not hesitate to contact me.

Yours sincerely

Sophie Cattier

Assistant Inspector of Historic Buildings and Areas

E-mail: sophie.cattier@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



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

Your Ref: DC/18/0380
Our Ref: IESCCG/MIDS/18/02380/AL

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

12 June 2018

Dear Sirs,

**Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access.)
Land To The East Of, Poplar Hill, Stowmarket, Suffolk IP14 2EJ**

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

Background

2. The proposal comprises a development of up to 64 dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. Ipswich and East Suffolk CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

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

Healthcare Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. The primary healthcare services directly impacted by the proposed development and the current capacity position are shown in Table 1.

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Stow Health	17,715	1000.00	14,583	-214.74
Combs Ford Surgery	8,387	378.50	5,520	-196.61
Total	26,102	1378.50	20,103	-411.35

Notes:

1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
 2. Current Net Internal Area occupied by the Practice.
 3. Based on 120m² per 1750 patients (this is an optimal list size for a single GP). Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
 4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity and range of services within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment or extension, would be sought from the CIL contributions collected by the District Council.
 7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to reconfigure or extend the above mentioned surgeries. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
9. Assuming the above is considered in conjunction with the current application process, Ipswich and East Suffolk CCG would not wish to raise an objection to the proposed development.
10. Ipswich and East Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Suffolk Coastal District Council.

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

Yours faithfully

Chief Corporate Services Office
Ipswich and East Suffolk Clinical Commissioning Group



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/18/02380

Referring to the planning application referenced above, dated 5 June 2018, application for the erection of up to 160 dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access, land to the east of, Poplar Hill, Stowmarket, Suffolk, IP14 2EJ, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Signature:

Date: 22 June 2018

Name: David Abbott

Position: Spatial Planner

Highways England:

Woodlands, Manton Lane

Bedford MK41 7LW

david.abbott@highwaysengland.co.uk

NATURAL ENGLAND'S LOCAL PLANNING CONSULTATION ADVICE FOR DEVELOPMENT WITHIN OR CLOSE TO WOODLAND DESIGNATED SITES

v. August 2017

Natural England's initial screening of this planning application has identified that this proposed development has the potential to adversely affect a Site of Special Scientific Interest (SSSI) designated for its woodland interest, i.e. the relevant Impact Risk Zones have been triggered.

The likely impacts arising from the proposal are straightforward to assess with confidence by following the advice notes provided below, and where necessary, requesting further information from the applicant where uncertainties exist. We therefore advise you to review the planning application under consideration, and apply the principles described, as appropriate.

Please note that this advice (where specifically referred to in our consultation response) only applies to development proposals within Essex, Hertfordshire, Bedfordshire, Cambridgeshire, Northamptonshire, Suffolk and Norfolk planning authorities.

Standing Advice on ancient woodland and veteran trees

Natural England and Forestry Commission have produced [standing advice](#) entitled '*Ancient woodland and veteran trees: protecting them from development*' which outlines what planning authorities should consider for developments near ancient woodland and veteran trees. Advice is given on determining impacts and how to avoid, reduce or compensate for the impacts. Note that planning authorities should refuse planning permission for developments that would lead to loss or deterioration of irreplaceable ancient woodland habitats unless the need for, and benefits of, the development in that location clearly outweigh the loss. This principle is outlined in the National Planning Policy Framework paragraph 118.

Ancient woodland and veteran trees within the application site

We strongly advise the retention of ancient woodland and veteran trees *within* the application site as they have important roles to perform as local landscape features and possibly as visual screening, as wildlife habitats for woodland species (including NERC Act s41 priority species such as stag beetle) and ecological corridors for mobile species. Depending on the configuration of the proposed development, they may also act as buffers to the designated site.

Larger sites have more options for green infrastructure in general, but we suggest that woodland/veteran trees within the application site are designed into an ecological network / local landscaping which includes connections to other wooded habitat and transitions to semi-natural habitats, such as long grassland.

Reasons for Notification of Sites of Special Scientific Interest (SSSI)

Background information on SSSIs and their notified interest features can be found on the [Magic map system](#) website. The SSSI citation should be referred to in order to understand the special interest of the SSSI and its sensitivities.

SSSI Impacts which may need to be addressed

(i) Air quality during construction

Best practise measures should be deployed during construction to minimise the likelihood of dust and other airborne pollutants, which in excess can smother leaves and hinder normal photosynthetic functioning of plants.

(ii) Increase in access

Any new access points into the SSSI from adjacent developments should be avoided. If a development shares a boundary with a woodland SSSI, the application should include details of a suitably robust (full height) boundary fence. The SSSI must not be used for access by construction vehicles or storage of materials (even temporarily). For larger sites which may be transferred to a grounds maintenance company, the specification of their responsibilities should include any boundary treatment monitoring and maintenance.

Where public access into the woodland already exists, new housing development is likely to increase visitor pressure to woodland SSSIs, and may result in an increase in impacts such as the trampling of ground flora, and nutrient enrichment from dog waste in particular. General disturbance impacts to other (non-notified) wildlife may also increase. Natural England may provide bespoke advice where in our view these issues are significant for certain SSSIs, either individually or cumulatively, however you may wish to consult with the woodland owner / manager with a view to identifying whether any proportionate developer contribution to specific visitor management measures may be appropriate (such as improved signage, dog bins, path surface treatment etc.).

(iii) Root compaction

An appropriate root protection zone should be clearly marked on plans, and no buildings (or other operations likely to result in soil compaction) should be constructed within this zone. The root protection zone should be in accordance with British Standard BS 5837:2012 '*Trees in relation to design demolition and construction*'. We recommend that the advice of a Tree Officer/professional arboriculturalist is sought where root protection zones may be required.

(iv) Tree surgery works

Trees growing within the SSSI close to the boundary of the application site may also have boughs and branches extending within the red-line boundary. Our advice is that these branches should not be removed or cut back for aesthetic reasons, e.g. to increase light levels to a garden or reduce leaf drop in Autumn, but might be permitted for health and safety reasons. If necessary, the advice of a Tree Officer/professional arboriculturalist should be sought, and a full tree health survey commissioned prior to permission being granted. The site layout may need to be adjusted to take account of both limitations on tree surgery works as well as the root protection zone.

(v) Surface water runoff

During the construction phase, surface water drainage must be directed away from the SSSI, and care should be taken to ensure that contamination does not enter drainage ditches which feed into the SSSI. For the operational phase, SuDS should be used to maximise groundwater infiltration rates where appropriate.

(vi) Foul water disposal

The application should confirm that foul drainage will be to mains sewer. Additional advice may be needed from Natural England if alternative arrangements are proposed. Care should be taken that pollutants do not enter local watercourses feeding the SSSI once development is completed.

(vii) Groundwater changes

Some woodland SSSIs are dependent upon ground-water supplies remaining undisturbed (for example, if there is a significant alder/willow component (wet woodland or carr) within the SSSI). Any activities proposed by the development which might interfere with groundwater supplies, such as increased abstraction, should be assessed as part of the decision-making process.

(viii) Development Buffering

Natural England advises that, notwithstanding any root protection zone required, that a buffer zone of at least 15m between the development and the SSSI should be designed into the layout plan where possible, with the view to ensuring that the SSSI is buffered from any remaining possible impacts (such as increases in lighting and noise), and that the SSSI is sensitively designed into local landscaping. This would also help to reduce anti-social activities, such as fly-tipping.

If the developer requires substantive pre-application advice in addition to that provided above, Natural England advises that the applicant/developer consults Natural England directly, so that they have the opportunity to express an interest in using our chargeable Discretionary Advice Service (DAS).

The first step is for the developer to fill out a simple form, so we can register their interest, and make sure they have the right adviser for their case. Please visit our website (<http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/das/default.aspx>) for more information and a downloadable request form [here](#) .



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00028698
Local Planning Authority:	Mid Suffolk District
Site:	Land To The East Of Poplar Hill, Stowmarket
Proposal:	Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access
Planning Application:	DC/18/02380

Prepared by: Pre-Development Team

Date: 27 June 2018

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

ASSETS

Section 1 – Assets Affected

- 1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

- 3.1 The sewerage system at present has available capacity for these flows via a pumped discharge regime to manhole 6003 on Hillside in correspondence to the Pre-Development Enquiry 27047. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 – Surface Water Disposal

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

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

Section 5 – Trade Effluent

5.1 Not applicable

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

25/06/2018

Dear Gemma,

RE: DC/18/02380 Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access). Land to the East of Poplar Hill, Stowmarket

Thank you for sending us details of this application. We have read the ecological appraisal report (FPCR, 2018) and note the findings of the consultant. We have the following comments on this proposal:

Statutory Designated Sites

The application site is located within approximately 500m of Combs Wood Site of Special Scientific Interest (SSSI), the wood is also a Suffolk Wildlife Trust reserve. We note the conclusion in the ecological appraisal report that as the wood is over 800m from the application site that it is unlikely to be accessed on a daily basis by a significant number of people. We disagree with this conclusion. Evidence from elsewhere in the county identifies that regular walking routes in the region of 2.3km to 2.6km are used, particularly by dog walkers. As the distance between the application site and Combs Wood is within a circular walk of this length, we consider that further assessment of the likely increase in recreational pressure on the wood is required in order to determine what impact the proposed development will have.

Protected and/or UK Priority Species

The ecological appraisal report identifies that further surveys for great crested newts, reptiles, water voles and breeding birds are required to inform the assessment of the likely impacts of the proposed development on these species. Whilst it is understood that a number of these surveys are underway, to date the results are not available on the council's website and therefore it is not possible to determine the full impacts of the proposed development on these groups/species.

Stowmarket Area Action Plan (AAP)

Policy 6.20 of the Stowmarket Area Action Plan (adopted 2013) allocated land off of Farrier's Road and Poplar Hill for new residential development, this included an area of informal public open space on the eastern side of Poplar Hill. This area is now proposed for residential development as part of this application. Approval of this application would appear to mean that the delivery of the Farrier's Road/Poplar Hill development could not be achieved in the form adopted in the AAP. This proposed development would therefore appear not to be in accordance with the adopted plan.

Conclusion

As currently presented we consider that this application fails to demonstrate that the proposed development will not result in an adverse impact on statutory designated sites (Combs Wood SSSI) and

protected and/or UK Priority species. The proposal also appears to be contrary to the adopted Stowmarket AAP. We therefore object to this application.

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

Yours sincerely

James Meyer
Senior Conservation Planner

Your Ref: DC/18/02380
Our Ref: 570\CON\2284\18
Date: 21st June 2018



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the Attention of: Gemma Walker

Dear Gemma

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN DC/18/02380

PROPOSAL: Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access.)

LOCATION: Land to the East of Poplar Hill, Stowmarket, Suffolk, IP14 2EJ

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

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

- The junction assessments show the traffic created from the development increases the Ratio of Flow (RFC) by 0.06 at major junctions.
- The maximum 85thile speed recorded on Poplar Hill adjacent to the site is 43.3mph and the required visibility for the access on the highway can be met.
- the site is likely to generate 84 two-way trips in the AM peak hour and 82 trips in the PM peak hour which is acceptable in this location (approx. 1.5 cars per minute).
- There are records of 2 slight injury accidents on Poplar Hill.
- The proposed emergency/pedestrian access off Church Road improves connectivity to the local amenities for cyclists and pedestrians.

Taking all the above into account, it is our opinion that this development would not have a severe impact (NPPF para 32) therefore we do not object to the proposal.

The Travel Plan (dated May 2018) that was submitted on behalf of the planning application does identify some measures to encourage residents' uptake in sustainable transport, however these measures are not likely to achieve much of a reduction in vehicular trips. The following issues below need to be addressed:

- If the option of diverting the bus route isn't taken forward, the nearest suitable bus service for commuting purposes (to Stowmarket town centre and Ipswich) from the site is over 1km. As a result, it is quite likely that the resident would use their car for a similar journey due to it being

quicker and more convenient to complete. Measures and evidence to overcome this issue would need to be identified in the Travel Plan.

- The catchment secondary school (Stowmarket High School) is two miles away from the site. As a result, secondary education pupils that reside on the site will not be eligible for the free school transport and may need to be driven to the school and have an impact on the AM peak travel period. Suitable measures to overcome this issue must be identified in the Travel Plan. Also some measures to encourage sustainable travel to the catchment primary school (Trinity Primary School) should also be identified, with evidence of consulting the school.
- The value of the sustainable travel vouchers has not been identified. The vouchers should be to the value of two one month bus tickets to allow travel to Ipswich per dwelling, or a cycle or rail voucher of equivalent value.
- No suitable Travel Plan monitoring strategy has been identified. The Travel Plan must be primarily monitored by vehicular counts on all vehicular access points to the site over a minimum two week period avoiding public and school holidays to provide comparable trip data to the predicted trips identified in the supporting Transport Assessment. This will need to be undertaken on occupation of the 100th dwelling and continued annually for a minimum of five years, or one year after occupation of the final dwelling, whichever is the longest duration.
- There is no reference to providing electric vehicle charging infrastructure for each dwelling, which falls within the remit of a Travel Plan according to the NPPF.

A revised Travel Plan or Technical Note that fully takes into account the comments raised must be submitted prior to the determination of this application.

These revisions need to comply with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

CONDITIONS

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

1 V 1

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. P18010-001E with an X dimension of 2.4m and a Y dimension of 106m & 119m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

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

2 ER 1

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

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

3 ER 2

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

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

4 D 2

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

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

5 B2

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

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

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

6 HGV1

Condition: All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

7 NOTE 07

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

8 NOTE 15

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.

9 P 2

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

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

10 TP1

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

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

S106 Contributions

Public Transport

There are bus stops that serve the community on Poplar Hill. The transport team would like the applicant to liaise with the Bus Operators and consider the option of bus routes 88/89 diverting into the development and provide bus stops with shelters and RTP1 screens within the site. If the route does not divert, a contribution of approx. £5,000 is required to construct or improve bus stops nearby.

Travel Plan

Financial contributions may be required by Suffolk County Council if the applicant requires any direct assistance from the County Council in regards to the implementation of the Travel Plan. This can be agreed as part of the Section 106 negotiations at a later date if required.

The following requirements of the Travel Plan should be secured by Section 106 obligations or planning conditions to ensure it is implemented over the required timescale:

- Implementation of the Interim Travel Plan (when approved)
- Appointing and providing the contact details of the Travel Plan Coordinator to the Highway Authority
- Submission, approval and full implementation of a Full Travel Plan on occupation of the 100th dwelling
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied
- A Travel Plan Bond and Travel Plan Evaluation & Support Contribution (cost to be agreed at a later stage if required) if there is any direct overarch between the Travel Plan's Targets being applied to the vehicular trip rate in the supporting Transport Assessment

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

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

Full wording for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted. More detailed Travel Plan comments can be provided on request by the applicant if needed.

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development

From: RM Floods Planning
Sent: 03 September 2018 10:47
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>
Subject: 2018-09-03 JS reply Land To The East Of, Poplar Hill, Stowmarket, Suffolk IP14 2EJ Ref DC/18/02380

Dear Gemma Walker,

Subject: Land To The East Of, Poplar Hill, Stowmarket, Suffolk IP14 2EJ Ref DC/18/02380

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/02380.

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

- Flood Risk Assessment & Outline Surface Water Drainage Strategy Ref 881399-R2(01)-FRA Issue 1
- Site location Plan Ref 8283-L-01-A]
- Soakage Infiltration testing ref 302017 L01 (00) MB
- Letter from Gladman developments Ltd dated 30th July 2018
- Letter from RSK ref 881399 FRA L01

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

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

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

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

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

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

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

5. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
 - a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 - i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act

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

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

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

Our Ref: 2018_02380
Date: 11th June 2018

For the Attention of Gemma Walker

Dear Mr Isbell

**Planning Application DC/18/02380/OUT – Land east of Poplar Hill, Stowmarket:
Archaeology**

This site is located in an area of very high archaeological potential, as recorded on the County Historic Environment Record. Roman and medieval archaeological remains were recorded during archaeological investigations immediately to the north-west (COM 041) and large scatters of finds dating from the Mesolithic to post-medieval periods have been identified in the immediate vicinity (COM 25 and 045). The Grade 1 medieval church of St Mary (COM 012) is located to the east, as well as associated medieval and post-medieval earthwork remains (COM 007, 009 and 010). This site is also an area that is topographically favourable for early occupation, overlooking a tributary of the Rattlesden River. However, as this site has never been the subject of systematic archaeological investigation, there is high potential for previously unidentified multi-period archaeological remains to be present which could be damaged or destroyed by development.

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

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

In order to establish the archaeological potential of the site, a geophysical survey will be required in the first instance. The geophysical survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

Historic England should also be consulted regarding the impact of development proposals upon the setting of the Grade I listed church.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

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/F221400
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 02/07/2018

Dear Sirs

Poplar Hill, Stowmarket IP14 2EJ
Planning Application No: DC/189/02380/

I refer to the above application.

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

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

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

Continued/

OFFICIAL

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

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

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: PDL1

Copy: Gladman Developments Ltd, Gladman House, Alexandria Way, Congleton
CW12 1LB

Enc: Sprinkler information

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

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

Your Ref:
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 2 July 2018

Planning Ref: DC/18/02380

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Poplar Hill, Stowmarket IP14 2EJ
DESCRIPTION: 160 Dwellings
NO: HYDRANTS POSSIBLY REQUIRED: Required

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

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen
Water Officer

OFFICIAL

Your ref: DC/18/02380
Our ref: Stowmarket – land to the east of
Poplar Hill 00053725
Date: 07 June 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Ms Gemma Walker,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Gemma,

Stowmarket: land to the east of Poplar Hill – developer contributions

I refer to the proposal: outline planning application – erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access (all matters reserved except for access).

I provided pre-application advice by way of letter dated 15 February 2018.

Ideally, the County Council would like to see a plan-led approach to housing growth in the locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including highway impacts and school provision.

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District's planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

This letter sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site specific mitigation.

Whilst most infrastructure requirements will be covered under Mid Suffolk District Council's Regulation 123 list of the CIL charging schedule it is nonetheless the Government's intention that all development must be sustainable as set out in the National Planning

Policy Framework (NPPF). On this basis, the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.

A planning obligation or planning conditions will cover site specific matters. The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

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

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

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

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

In addition, this proposed development falls within the Stowmarket Area Action Plan (SAAP) and it therefore needs to be considered in relation to SAAP Policy 11.1 and Core Strategy Policy CS6 which requires all development to provide for the supporting infrastructure they necessitate.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 which is implemented on planning permissions granted from 11th April 2016. Regulation 123 requires mid Suffolk to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

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

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

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

The details of the impact on local infrastructure serving the development is set out below and will form the basis of a future CIL bid for funding:

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

The NPPF at paragraph 38 states ‘For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.’

SCC anticipates the following **minimum** pupil yields from a development of 160 dwellings, namely:

- a. Primary school age range, 5-11: 40 pupils. Cost per place is £12,181 (2018/19 costs).
- b. Secondary school age range, 11-16: 28 pupils. Cost per place is £18,355 (2018/19 costs).
- c. Secondary school age range, 16+: 6 pupils. Costs per place is £19,907 (2018/19 costs).

The local catchment schools are Combs Ford Primary, and Stowmarket High School.

Based on existing forecasts SCC will have no surplus places available at the catchment schools. On this basis, SCC will make future CIL funding bids at a minimum cost of £487,240 (2018/19 costs) for primary school provision, and £633,382 (2018/19 costs) for secondary school provision.

- 2. Pre-school provision.** Refer to the NPPF ‘Section 8 Promoting healthy communities’. The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents’ needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children’s services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

From these development proposals SCC would anticipate up to 25 pre-school children arising.

This proposed development is in the Stowmarket South ward, where there is an existing surplus of places.

3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
4. **Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

A planning obligation or planning conditions will cover site specific matters.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £34,560, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

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

Household Waste and Recycling Centre – Old Bury Road, Stowmarket IP14 1JQ: Already at capacity and significantly challenged. Current issues are:

- Footprint (m²) is small for number of visitors and tonnages received
 - Restricted parking space for visitors to utilise and access all recyclables containers
 - Restricted number of containers on site
 - No available space to add material streams to recycle or add reuse facility
- Traffic queuing at busy times due to challenging access arrangements
 - Access off the highway is from one way only
- Complaints regarding queues and noise
- No available land around current site to expand
- Site closes for safety reasons when containers are exchanged

SCC has a project underway to identify a new HWRC site for the Stowmarket catchment area. Likely cost of a new HWRC is between £3m and £5m. This is a priority site in the Waste Infrastructure Strategy and it is hoped that budget will be identified for this purpose. However, the Waste Service would expect CIL contributions of £110 per household from any significant development in this area. In this case a sum in the region of £17,600 would be applicable.

7. Supported Housing. In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic population. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, SCC would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the local planning authority's housing team to identify local housing needs.

8. Sustainable Drainage Systems. Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the Secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting

out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that, in considering planning applications:

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

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

A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

- 9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
- 10. Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

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

- 11. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.
- 12.** The above information is time-limited for 6 months only from the date of this letter.

The above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

Yours sincerely,

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

cc Carol Barber, Suffolk County Council
Sam Harvey, Suffolk County Council
Floods Planning, Suffolk County Council

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Gemma Walker – Area Manager Planning
From: Julie Abbey-Taylor, Professional Lead – Housing Enabling
Date: 06/06/2018

SUBJECT: - Application Reference: DC/18/02380

Proposal: Application for Outline Planning permission for erection of up to 160 dwellings on land east of Poplar Hill, Stowmarket

Key Points

1. Background Information

A development proposal for up to One hundred and sixty (160) dwellings on land east of Poplar Hill, Combs, Stowmarket
This is an open market development and offers 56 affordable housing units on the site which = 35%.

2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing. A new SHMA is currently being written but outcomes are not available at the time of this consultation.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum**.

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%

3	16%
4+	2%

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

Estimated proportionate demand for all tenure new housing stock by bedroom number	
Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

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

2.6 The Council's Choice Based Lettings system currently has circa.890 applicants registered for affordable housing in Mid Suffolk at March 2018.

2.7 The Council's Choice Based Lettings system currently has circa 350 applicants registered for affordable housing, who are seeking accommodation in Stowmarket as at 2018. This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **890** applicants registered is the important number.

3. Preferred Mix for Open Market homes.

Inclusion of 2 and 3 bed bungalows/ chalet bungalows

At least 25% 2 bedrooled houses/flats

Some 4 bedrooled but the rest to be 3 bedrooled houses.

Open market housing mix needs to demonstrate how this site will contribute to the provision of housing for older people as Mid Suffolk has an increasing ageing population.

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

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

4. Preferred mix for Affordable Housing

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows circa.350 applicants registered who have a connection to Stowmarket.

4.2 56 of the proposed dwellings on the development will be for affordable housing. These have been offered the form of: -

Delivery of 35% affordable housing, at nil cost to the Council, is a significant material benefit to this scheme.

An indicative housing mix that may be delivered on site is as follows:

Housing Type	Affordable	Market	Total
1-bed apartment	12	0	12
2-bed semi-detached	14	0	14
3-bed semi-detached	24	34	58
3-bed detached	0	12	12
4-bed semi-detached	6	0	6
4-bed detached	0	42	42
5-bed detached	0	16	16
Total	56	104	160

The mix as indicated above is not the mix we would require and accordingly we would seek the following: -

Rented: -

6 x 1 bed 2-person flats @ 50 sqm

8 x 2 bed 4-person flats @ 70 sqm

4 x 2 bed 3-person bungalows @ 61 sqm

2 x 2 bed 4-person bungalows @ 70 sqm

16 x 2 bed 4-person houses @ 79 sqm

6 x 3 bed 5-person houses @ 93 sqm

Shared ownership: -

2 x 2 bed 4-person bungalows @ 70 sqm

10 x 2 bed 4-person houses @ 79 sqm

6 x 3 bed 5-person houses @ 93 sqm

The above mix is requested and to be included in the S106 agreement.

5. Other requirements for affordable homes:

- Properties must be built to current Nationally Described Space standards as published March 2015. Paragraph 9.16 states that the properties do meet this standard although no floor areas have been provided.
- The council is granted 100% nomination rights to all the affordable units on all first lets and 75% thereafter
- Adequate parking provision is made for the affordable housing units and inclusion of cycle storage/sheds.

Julie Abbey-Taylor, Professional Lead – Housing Enabling

From:David Pizzey
Sent:8 Jun 2018 10:15:47 +0100
To:Gemma Walker
Cc:BMSDC Planning Area Team Blue
Subject:DC/18/02380 Land To The East Of, Poplar Hill, Stowmarket

Gemma

I have no objection in principle to this proposal subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report. Although a small number of losses seems likely, the trees affected are of limited amenity value and their removal will have negligible impact upon the character of the local area. If you are minded to recommend approval of the application we will also require an arboricultural method statement and tree protection plan for the scheme, this can be dealt with as part of reserved matters.

Regards

David

David Pizzey FARborA

Arboricultural Officer

Tel: 01449 724555

david.pizzey@baberghmidsuffolk.gov.uk

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

Babergh and Mid Suffolk District Councils – Working Together

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

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

Sent: 05 June 2018 10:53

To: David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>

Subject: MSDC Planning Consultation Request - DC/18/02380

Please find attached planning consultation request letter relating to planning application - DC/18/02380 - Land To The East Of, Poplar Hill, Stowmarket, Suffolk IP14 2EJ

Kind Regards

Planning Support Team

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

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

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

website hyperlink: <https://www.babergh.gov.uk/the-council/your-right-to-information/>

From: Nathan Pittam
Sent: 26 June 2018 09:58
To: Gemma Walker
Cc: BMSDC Planning Area Team Blue
Subject: DC/18/02380: Land Contamination

Dear Gemma

EP Reference : 243425
DC/18/02380: Land Contamination
Land To The East Of, Poplar Hill, STOWMARKET, Suffolk, IP14 2EJ.
Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access.).

Many thanks for your request for comments in relation to the above application. I have reviewed the Phase I report submitted in support of the application and note that the report recommends that further additional limited sampling – however I feel that this is a largely precautionary measure that would not be necessary to achieve by means of condition. I therefore have no objection to the proposed development from the perspective of land contamination. Should the applicant wish to pursue the precautionary investigation then this would be outside of the planning system but we would be willing to review any such investigation.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 07769 566988

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

From: Nathan Pittam
Sent: 26 June 2018 10:09
To: Gemma Walker
Cc: BMSDC Planning Area Team Blue
Subject: DC/18/02380: Air Quality

Dear Gemma,

EP Reference: 243423
DC/18/02380: Air Quality
Land To The East Of, Poplar Hill, STOWMARKET, Suffolk, IP14 2EJ.
Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access.)

Many thanks for your request for comments in relation to the above application from the perspective of air quality. Having reviewed the air quality assessment from AQC I can confirm that I am in agreement with the findings of the assessment that the likelihood of the development adversely impacting on the existing good air quality is low and as such I have no objection to the proposed development from the perspective of air quality.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 07769 566988

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

From: Philippa Stroud

Sent: 20 July 2018 09:07

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

Cc: Gemma Walker <Gemma.Walker@baberghmidsuffolk.gov.uk>

Subject: DC/18/02380 Land To The East Of, Poplar Hill, Stowmarket - EH Other Issues

WK/243426

**APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/18/02380
EH – Noise/Odour/Light/Smoke**

Proposal: Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access.)

Location: Land To The East Of, Poplar Hill, Stowmarket, Suffolk IP14 2EJ

Thank you for the opportunity to comment on the above application.

The Noise Assessment Report, dated May 2018, prepared by Noise Consultants Ltd demonstrates that with standard double-glazing and trickle ventilation to the proposed dwellings, there should not be significant adverse impacts on the occupiers. I would advise, however, that the recommended mitigation measure of ensuring that amenity areas fronting Poplar Hill are located no closer than 15m from the carriageway edge, is controlled by condition.

The application site is close to existing residential dwellings and for this reason there is a risk of loss of amenity during the construction phase of the development. I would, therefore, recommend that a construction management plan be required by means of condition.

Such a plan shall include details of operating hours (which shall be limited to 08.00hrs – 18.00hrs Monday – Friday, 09.00hrs – 13.00hrs on Saturdays, with no working to take place on Sundays, Public or Bank Holidays. Deliveries should also be limited to these hours), means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, wheel washing facilities, lighting, location and nature of compounds and storage areas, waste removal, temporary buildings and boundary treatments, dust management, noise management and litter management during the construction phase of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phase, unless otherwise agreed in writing by the Local Planning Authority.

Note: the Construction Management Plan shall cover both 'site clearance' and the construction phase of the above development and there shall be no burning of waste.

Lighting

At this stage it is not possible to adequately assess the impact of lighting from the proposed development. It is, therefore, recommended that a condition be attached to any permission requiring full details of the scheme of lighting including a polar

luminance diagram based on vertical luminance at the site boundary and at the nearest residential properties if these will be affected.

Regards,

Philippa Stroud

Senior Environmental Protection Officer

Babergh & Mid Suffolk District Councils - Working Together

t: 01449 724724

e: Philippa.Stroud@baberghmidsuffolk.gov.uk

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

Subject:FW: M3 243428: MSDC Planning Consultation Request - DC/18/02380

From: Iain Farquharson
Sent: 06 July 2018 11:57
To: BMSDC Planning Area Team Blue
Cc: Gemma Walker
Subject: M3 243428: MSDC Planning Consultation Request - DC/18/02380

Dear Ms Walker

We have reviewed this application and are pleased to see the applicant is aiming to reduce emissions of CO2 to below that required by building regulations (D&A document section 5 sustainability) we are also please to see consideration of environmentally friendly materials will take place.

We encourage these aims and would ask that water use once dwellings are occupied is also minimised and also provision for electric vehicles is made throughout the site, the addition of a fused point in the parking areas and suitable cabling back to the distribution board will have minimal cost and avoid disruption and greater expense in the future.

We request a condition is added should permission be granted and offer the following wording:
Before any development is commenced a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3 SO8 and NPPF para 35) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). Details as to the provision for electric vehicles should also be included. This document shall be submitted to, and approved in writing by, the Local Planning Authority before construction commences.

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

01449 724878 / 07860 827027
//iain.farquharson@babberghmidsuffolk.gov.uk

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

From: planningblue@babberghmidsuffolk.gov.uk <planningblue@babberghmidsuffolk.gov.uk>
Sent: 05 June 2018 10:52
To: Environmental Health <Environmental@babberghmidsuffolk.gov.uk>
Subject: MSDC Planning Consultation Request - DC/18/02380

Please find attached planning consultation request letter relating to planning application - DC/18/02380 - Land To The East Of, Poplar Hill, Stowmarket, Suffolk IP14 2EJ

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk

District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

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

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

website hyperlink: <https://www.babergh.gov.uk/the-council/your-right-to-information/>

9 July 2018

Ms Gemma Walker
Senior Planning Officer
Mid Suffolk District Council
Endeavour House
8 Russell Rd
Ipswich , IP1 2BX

Dear Ms Pannell

DC/18/02380 Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. (All matters reserved except for access.)

Land to the East of Poplar Hill Stowmarket Suffolk IP14 2EJ

I am writing on behalf of the Suffolk Preservation Society ('the Society') to object to the planning application for the erection of 160 dwellings on a greenfield site which is outside, but adjoining, the current physical limit of Stowmarket. The site is elevated, is of a high scenic value and makes a significant contribution to the setting of St Mary's Church, a grade I listed building. Furthermore, the site forms a strategic gap between Stowmarket and the village of Combs and its development would give rise to coalescence of these two quite distinct settlements.

Landscape Impact

The site is identified as Rolling Valley Claylands typology in the Suffolk Landscape Characterisation Study (SCC 2011). It is characterised by gentle valley sides with smaller fields in arable use. Ancient woodland on the upper fringes of the valley and isolated churches are notable features of this landscape type. The Babergh Mid Suffolk Landscape Guidance (2015) specifies that *new development within this landscape character is likely to have significant impact on both the character and visual amenity of valley floor and valley side*. The aim of the guidance seeks to retain, enhance and restore this distinctive landscape and settlement character and the key design principles which should inform decision making relating to this typology state that *Due to the rolling landscape, development in this area is considered to have significant visual impact. All development must take into consideration the cultural historic importance of this area and the potential visual impact on conservation areas*. It is therefore clear that the site has a high landscape quality and demonstrates a historic, cultural and visual value that must be fully recognised in the decision making process in accordance with para. 109 of the NPPF which requires the planning system to contribute to and enhance the natural and local environment by seeks to *protecting and enhancing valued landscapes*.

Heritage Impact

Simon Knott in his highly respected website Suffolk Churches, 2010 describes St Mary's Church as *a perfect example of a 15th century Suffolk church in all its glory*. And goes on to describe it as *being on the edge of the housing estate but the setting is otherwise profoundly rural: you reach it along a doglegging lane from the top of Poplar Hill and the last few hundred yards is along a narrow track which ends in the wide graveyard. The church is set on low ground, hills rising away to the north and south and the effect, on looking down at it, is of a great ship at rest in harbor*. He concludes *Both artistically and historically this is probably the most important church in All East Anglia*.

In its undeveloped form, the site currently makes a very strong positive contribution to the wider agrarian setting of St Mary's church. The church has an elevated position at the top of the valley side and is encircled by mature trees. The church sits remotely and in a commanding position and provides a focal point in the landscape. Its setting makes a very strong contribution to its significance by virtue of its elevated and detached position. The sovereignty of the church and its dominion over the parish is clearly demonstrated by this strategic siting. Its imposing scale and positioning within the landscape clearly communicates the power of the medieval church and the role that it played in society.

The Babergh Mid Suffolk Heritage and Sensitivity Assessment report, (March 2018) prepared by Place Services on behalf of the councils to inform the Site Allocations process and to form part of the evidence base of the Joint Local Plan states that while the outer areas of Stowmarket are considered to be of low susceptibility to change there are small areas of higher value on the outskirts of the settlement including several farmsteads and the grade I listed church at Combe Hall. It states *The assessments highlighted a number of important asset types which were both of high value and highly susceptible to change. These include churches and hall manors...and moated sites and historic farm complexes set within a wider agricultural landscape*. The assessment concludes that *Many of the higher status assets, particularly churches have been sited on high points in the landscape and were deliberately intended to be visible in log views throughout the wider landscape. This gives these assets large settings, which make an important contribution to their value and both their extent and value of their wider landscape setting will be integral consideration in considering proposed site allocations*.

The setting of the church has already been eroded to some degree by post war development which has encroached along the valley sides and results in a level of harm to the appreciation of the church. This is especially evident from views within the churchyard. Nevertheless, the tide of development has to date been restricted to the north, but any further development further south would fundamentally erode the qualities that make such a strong contribution to the appreciation of the church and its landscape setting.

National, Local Policy and Historic England Guidance

As one of the few statutory considerations in the planning process, heritage assets are afforded statutory protection under Section 66(1) of the Planning (LBCA) Act 1990. This statutory duty requires the decision maker to afford *special attention to the desirability of preserving or enhancing the character or appearance of the listed building*. This includes the contribution to its significance made by its setting. The NPPF gives clear advice on when considering the impact of a proposed

development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance (paragraph 132).

Historic England guidance amplifies this advice in *Setting of Heritage Assets - Good Practice Advice in Planning*, Note 3, Second Edition (2017). The guidance explains that setting is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary). It confirms that *The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places and goes on to explain that Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance.* Therefore, the Society considers that the setting makes a very important contribution to the significance of the listed building and must be afforded considerable weight in assessing this application for further development which would irrevocably destroy it.

Coalescence

The site is within the area covered by the 2013 Stowmarket Area Action Plan which affirms that an acceptable degree of separation between Stowmarket and surrounding villages should be safeguarded (para 6.5) and that the importance of maintaining the separate identity of Combs and Stowmarket is a key issue. It states that *The need to control the visual impact of any development in this area will remain paramount, and development must limit any impact on the visual appearance on the skyline and respect its very rural setting.* (para 6.42). We note that Policy 6.20 Land of Farriers Road and Poplar Hill allocates a small part of this site for residential development, at the north end of the site, close to the boundary of the built up part of Church Road, but crucially is identified as informal open space for recreational purposes. The policy also identifies the need to protect the landscape and maintain the separation between Stowmarket and Combs, including provision of strategic advanced planting and structural landscaping and the need to protect the impact on the skyline of any development that takes place on the ridgeline along Poplar Hill. The submitted application fails to recognise the landscape sensitivity of the site and the importance of it as a strategic gap between Stowmarket and Combs.

Conclusion

The Society acknowledges that in order to deliver the significant levels of growth as set out in the Core Strategy Focused Review, further housing delivery in Stowmarket requires some well-considered greenfield development. In this case the site has not been allocated for housing development nor is it included in the 2017 SHELAA and it is contrary to the Stowmarket Area Action Plan (2013). It is acknowledged that Babergh Mid Suffolk Councils do not have a sufficient housing land supply currently in place and therefore *"Housing applications should be considered in the context of the presumption in favour of sustainable development* (NPPF para. 49). However, we would refer to para. 14 of the NPPF

which explains that this means "*granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits*". The Society considers that the environmental harm associated with this proposal; impacting on the landscape character, views and wider setting of the church and erosion of the gap between the town and village of Combs are of such a magnitude that they materially outweigh the public benefits of contributing to housing supply in the district and therefore this application should be refused.

We trust you will find these comments helpful in the consideration of this application.

Yours sincerely,

Fiona Cairns IHBC MRTPI
Director

Ward Councillor – Nick Gowrley, Gerard Brewster and David Whybrow
Heritage Team
Stowmarket Town Council
Chairman Combs Parish Council
Stowmarket Society
Phil Butler - SPS Mid Suffolk District
RAID – Residents Against Increasing Development Combs/Stowmarket

The Stowmarket Society

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

28 June 2018

Dear Sirs

DC/18/02380 | Outline Planning Application- Erection of up to 160 No. dwellings with public open space, landscaping and sustainable drainage system and creation of new vehicular access. | Land To The East Of Poplar Hill Stowmarket

The Stowmarket Society would like to register its objection to this proposal.

Over recent years, much thought has been given into finding sites which are suitable for accommodating the expansion of Stowmarket. This site has been considered as part of that process, and rejected as inappropriate. Nothing has changed recently which could alter that conclusion.

One of our greatest concerns about the development of this site is the impact that it would have on the setting of the Grade 1 Listed Combs Parish Church. The setting of a Listed Building can be much more than just the small patch of land which forms its immediate surroundings. In the case of Combs Church, it includes its isolated position on a valley side, with the backdrop of historic Combs Wood in views to the church across open fields from Combs Village, and local roads and footpaths. The development of this site will completely change this setting, and profoundly degrade the setting of the building.

Yours faithfully

J Pattle - Secretary
The Stowmarket Society, 19 Bond Street, Stowmarket, IP14 1HR