

**MID SUFFOLK DISTRICT COUNCIL**

**DEVELOPMENT CONTROL COMMITTEE A MEETING 26<sup>TH</sup> SEPTEMBER 2018**

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

20/09/2018

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) – Further Comments. Land to the East of Poplar Hill, Stowmarket**

Thank you for sending us further details of this application. We have read the additional ecological survey and assessment information provided (Protected Species Report (Sep 2018), FPCR and FPCR response dated 10<sup>th</sup> September 2018 to our letter of 25<sup>th</sup> June 2018) and have the following comments:

Designated Sites

In our consultation response of 25<sup>th</sup> June 2018, we raised concerns that the potential impact of increased recreational pressure on Combs Wood SSSI as a result of the proposed development had not been fully assessed. We note the additional information provided on this by the applicant's ecological consultant (FPCR letter of 10<sup>th</sup> September 2018) and their conclusion that the proposed development will only result in a predicted increase of 20 people walking each week who may visit Combs Wood which will not result in a significant adverse impact on the wood. This conclusion appears to be based on the Ramblers Association report quoted in the letter.

However, the letter also quotes research from the Pet Food Manufacturers Association (PFMA) in relation to the number of households with dogs in the East of England. This quotes a figure of 21% of households which equates to up to 33 households within the proposed development. As dogs require walking at least once per day, this would appear to suggest that the new development will generate at least 33 walks per day, which is 231 walks per week or more than 11 times the number calculated from the Ramblers Association study. This figure also does not include those people without dogs who will also walk regularly in the area.

Whilst we acknowledge that public access to Combs Wood is promoted, based on the above we do not consider that the figure of 20 increased walking visits a week represents a realistic number that will result from the development.

We also note that Church Meadow County Wildlife Site (CWS) is considered to provide alternative walking routes, we query whether the impact of increased recreational pressure on this site has been assessed based on a realistic number of increased visits?

Protected and/or UK Priority Species

We note that the surveys for great crested newts, reptiles, water voles and breeding birds identified in the

ecological appraisal report (FPCR, May 2018) have now been completed (Protected Species Report, FPCR, September 2018). These have identified that the proposed development site supports slow worm, water vole and a suite of breeding birds (including UK Priority species), a 'medium' population of great crested newts is also present in the local area.

Whilst the report identifies mitigation measures for great crested newts, reptiles and water voles, it does not identify compensation measures for the loss of habitat for nesting skylark, a UK Priority species. The Stowmarket Area Action Plan (AAP) Policy 9.1 (criterion viii) requires that all developments must "implement appropriate mitigation and compensation measures to ensure that there is no net loss in biodiversity in the Stowmarket area". The proposed development must therefore meet the requirements of this policy.

#### Stowmarket Area Action Plan (AAP)

We note the comment from the applicant in relation to the lack of delivery of the area of open space proposed as part of Stowmarket AAP policy 6.20 (letter from Gladman Land of 30<sup>th</sup> July 2018). Whilst we are not aware of the background as to why this open space has not been delivered, we query whether the open space proposed as part of the current application is sufficient to provide for both this proposed development and that which forms part of the allocation in Stowmarket AAP policy 6.20?

#### Conclusion

We remain concerned that the recreational pressure impacts on designated sites that could arise from the proposed development have not been fully assessed and therefore the likely significance of the impacts is not fully understood.

In addition to this, we query whether the proposed development meets the requirements of policies 6.20 and 9.1 of the Stowmarket AAP. Consent should not be granted for development contrary to these policies.

For the reasons set out above we consider that the application still does not provide sufficient assessment of the potential for increased recreation pressures on Combs Wood SSSI and we therefore maintain our **objection** to this proposal.

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

Yours sincerely

James Meyer  
Senior Conservation Planner

## **DC/18/02380 AMENDED RECOMMENDATION**

Following the submission of additional ecology information and subsequently Suffolk Wildlife Trust comments on this (attached within the late papers) SWT have confirmed that sufficient information on protected species has been provided including mitigation measures for great crested newts, reptiles and water voles.

Whilst compensation measures have not been identified for the loss of habitat for nesting skylark this is something that could be addressed within a S106 agreement, and as such is not in itself reason to warrant refusal.

As such the reason for refusal No.4 on page 34 of the papers is no longer part of this recommendation.

Further information was also submitted with regards to the impact of the proposal on the SSSI, however Suffolk Wildlife Trust continue to have concerns that the assessment of the numbers of people potentially likely to visit the SSSI are not realistic and therefore any assessment of impact is flawed. As such the reason for refusal in this regard is still recommended.

The new recommendation in light of this additional information is set out below:

### **RECOMMENDATION**

That authority be delegated to Corporate Manager - Growth & Sustainable Planning to refuse outline planning permission for the following reasons:

1. The proposed development is situated on land outside of the settlement boundary of Stowmarket, the proposal fails to accord with the developments permitted within the countryside, contrary to Policies CS1 and CS2 of the Mid Suffolk Core Strategy (2008). The proposal is also contrary to the allocation of the site within policy 6.20 of the Stowmarket Area Action Plan (2013). Furthermore, the development fails to comply with the requirements of paragraphs 8 and 11 of the NPPF (2018) with regards to the presumption in favour of sustainable development as the proposal would have limited benefits outweighed by harm identified to the environmental objective, with particular regards to the natural and historic environment. As such the proposal is not acceptable in principle, being contrary to paragraphs 8, 11, 193 and 196 of the NPPF (2018), Policies CS1, CS2 and CS5 of the Core Strategy (2008), Policy FC1 and FC1.1 of the Core Strategy Focused Review (2012) Policies HB1, HB14, CL8 and CL9 of the Mid Suffolk Local Plan (1998) and the Stowmarket Area Action Plan (2013).
2. The proposal results in the loss of the site as an area of open countryside, forming part of the setting and contributing to the significance of the adjacent Grade I listed Church. The proposal would therefore fail to protect, preserve or enhance the character and appearance of the locality, landscape and therefore the setting and significance of the surrounding heritage assets, which would result in a high level of less than substantial harm to the setting and significance of the Listed Buildings not outweighed by public benefits. As such the proposal would be contrary to the requirements of the NPPF including with regards to the environmental role of sustainable development and furthermore with particular respect to paragraphs 8, 11, 193 and 196 of the NPPF (2018), Policy CS5 of the Core Strategy (2008) and Policy HB1 of the Mid Suffolk Local Plan (1998).
3. The proposed development results in the imposition of built development into the open countryside in a location where this would result in significant impacts on the character and appearance of the countryside, failing to protect or conserve landscape qualities,

considering both the natural and historical dimensions of the landscape in this locality. As such the proposal would fail to comply with the requirements of Policy HB1 of the adopted Mid Suffolk Local Plan (1998), Policy CS5 of the Mid Suffolk Core Strategy (2008), 6.20 and 6.22 of the Stowmarket Area Action Plan (2013) and paragraphs 8, 11 and 170 of the NPPF (2018).

4. The application fails to demonstrate that the development would not risk harm to Combs Wood Site of Special Scientific Interest with regards to the impact of additional visitors to the SSSI, by reason of insufficient information, given that the SSSI is within regular walking distance of the site wherein there is a likely increase in recreational pressure on the wood. The proposal is therefore contrary to paragraphs 8, 11, 170 and 175 of the NPPF (2018), Policy CS5 of the Core Strategy (2008), and Policies CL8 and CL9 of the adopted Mid Suffolk Local Plan (1998).
5. The application risks harm to heritage assets in terms of archaeological interest, with particular regards to the risk that significant finds may be identified which require preservation in situ, by reason of insufficient information being submitted to demonstrate that the archaeological impacts of the development are appropriately assessed, considered and mitigated. As such the proposal is contrary to paragraphs 8, 11, 189 and 190 of the NPPF (2018), Policy CS5 of the Core Strategy (2008), and Policy HB14 of the adopted Mid Suffolk Local Plan (1998).

