

Consultee Comments for Planning Application DC/18/00721

Application Summary

Application Number: DC/18/00721

Address: Land On The South Side Of Rags Lane Woolpit Suffolk

Proposal: Full Planning Application- Erection of 45 no. dwellings and creation of new vehicular access, open space and associated infrastructure (amended application to previously withdrawn DC/17/02767).

Case Officer: John Pateman-Gee

Consultee Details

Name: Mrs Peggy Fuller

Address: 86 Forest Road, Onehouse, Stowmarket, Suffolk IP14 3HJ

Email: peggy.woolpitpc@btinternet.com

On Behalf Of: Woolpit Parish Clerk

Comments

Woolpit Parish Council objects to the application and maintains its comments made on 17 April 2018. In addition, Woolpit Parish Council totally disagrees with the assertion in 2.31 of the application Heritage Statement that now that it is by-passed, the village centre of Woolpit is quieter and suffers only limited local traffic. This is a quotation taken from the Conservation Area appraisal document and was obviously written many years ago when the A14 by-pass was newly created. The centre of Woolpit now suffers frequent severe congestion and is unable to accept the additional traffic that this development will create.

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Consultee Details

Name: Mrs Peggy Fuller

Address: 86 Forest Road, Onehouse, Stowmarket, Suffolk IP14 3HJ

Email: peggy.woolpitpc@btinternet.com

On Behalf Of: Woolpit Parish Clerk

Comments

Woolpit Parish Council objects to this application on the grounds that the development is not sustainable within the definition of the NPPF.

1. Drinkstone Road / Green Road Junction and Green Road Pinch Point Improvements. The proposed scheme is unworkable and any highway changes in this area should be the subject of wider consultation. The statement from the applicant about the highway proposal that a no priority one way working scheme will be trialed and priority signs will be installed at a later date if found to be required clearly indicates that the changes have not been properly researched. Highway mitigation works at the pinch point would lead to damage to listed buildings in Green Road. The development is thus economically unsustainable (the land is not in the right place) and environmentally unsustainable (it does not protect and enhance the built environment).
2. Conservation Area. This development will bring a substantial increase in traffic to the historic core of Woolpit and bring harm to the setting of its conservation area and many listed buildings. The Street is already frequently blocked by commercial vehicles, buses, through traffic and shoppers cars and is unable to accept the additional vehicles this proposal will create. The distinctive centre of Woolpit is a jewel in the crown of Mid Suffolk and is admired and enjoyed by all who live here and visit. The increased traffic that this development will bring to the centre of Woolpit must not be allowed to inflict irreparable damage to our heritage. The development is thus economically unsustainable (the land is not in the right place) and environmentally unsustainable (it does not protect and enhance the built and historic environment).
3. Precedents from the Green Road application. Many of the traffic problems that would result from this application are the same as those produced by application 2112/16 (Land on East Side

of Green Road Woolpit). This application was recently refused on the grounds that harm would be done to Woolpits Conservation Area because of off-site works on Green Road, deemed necessary by SCC Highways in order to make the route from the site safe for pedestrians and vehicles. The harm was not outweighed by the public benefits from the site. This Rags Lane development, with a similar number of homes to Green Road, suffers from the identical problem in that traffic from the site must be routed through the same bottleneck on Green Road. The development is thus economically unsustainable (the land is not in the right place) and environmentally unsustainable (it does not protect and enhance the built and historic environment).

4. Public Open Space. The provision of a public open space, containing a large drainage pond, is wholly unsuitable and inadequate. It is not possible to imagine the area being used for its open space purpose and in fact it is probable that parents will consider it a dangerous location which their children should avoid. The development is thus socially unsustainable (it does not support strong, vibrant and healthy communities) and economically unsustainable (local infrastructure needs have not been addressed).

5. Children Play Area. No childrens play area is provided. A saved policy of the Mid Suffolk 1998 Local Plan requires new facilities to be provided as part of new development unless adequate facilities already exist nearby. No such facilities exist nearby. The development is thus socially unsustainable (it does not support strong, vibrant and healthy communities) and economically unsustainable (local infrastructure needs have not been addressed).

6. Alternative Traffic Route. The suggestion that To avoid the village centre, Green Road south, Heath Road and Steeles Road could be used as an alternative to get into and out of the area, which is only a slightly longer route (3.1.20 of applicants Transport Statement) is unacceptable. This would take additional traffic through the residential area of Steeles Road with its many parked cars, children and pedestrians and then past the school and Health Centre where there are already serious traffic problems. Heath Road is also an HGV route. The development is thus economically unsustainable (the land is not in the right place) and socially unsustainable (it does not support strong, vibrant and healthy communities).

7. Broomhill Lane Traffic. The proposal for Broomhill Lane to be accessible to only the vehicles of residents is unacceptable. Such a move would result in the existing Broomhill Lane traffic using Rags Lane, Drinkstone Road and the main village street and add to the present serious congestion in the conservation area. This proposal should be the subject of separate consultation outside of the application. A survey should be carried out of the vehicles using Broomhill Lane, together with their origins and destinations, to determine the impact on the village centre and other roads. The development is thus environmentally unsustainable (it does not protect and enhance the built or historic environment).

8. Contribution to the Community. Policy CS5 of the MSDC Core Strategy Development Plan encourages development to make a positive contribution to settlements and the historic

environment. This proposal contributes nothing to either and makes no attempt to do so. The applicant refers to public consultation but has not met or attempted to meet with the Parish Council or liaised with the Parish Council in any way to determine how this proposal might be integrated within the village. The development is thus socially unsustainable (it does not support strong, vibrant and healthy communities, or create a high quality built environment)

9. Housing and Layout Design. The style of housing proposed is out of keeping with the open rural setting of the surrounding area. The design in no way meets the requirement of Saved Policy GP1, to principally maintain and enhance the character of the surrounding area. Policy H13 identifies that design and layout should respect the character of the site and its surroundings. Existing buildings in Rags Lane include Grade 2 listed houses, some traditional style houses and 1960s to contemporary bungalows which are well spaced and mainly set back from the road. This is not compatible with the proposed development of off the peg house types with 40% of houses 4/5 bed. It is disappointing that there are no bungalows and few smaller houses as these have been identified in the village questionnaire for the oncoming Neighbourhood Plan as being wanted in the village. The development is thus socially unsustainable (it does not supply the housing required to meet the needs of present and future generations) and environmentally unsustainable (it does not enhance the built and historic environment). Specifically, the development is contrary to the principles expressed in paragraph 50 of the NPPF.

10. Loss of Habitat and Destruction of Ancient Hedgerow. The proposal will result in the unacceptable destruction of nearly 100m of the 200m of ancient hedgerow in Drinkstone Road which contains 10 plant species. The hedgerow is approximately 30 feet high and very wide as it has been uncut on the inside for many years. It provides an excellent wildlife habitat. Wildlife identified on site include jays, green woodpeckers, spotted woodpeckers, sparrowhawks, kestrel, warblers and yellowhammers (a red listed endangered species), frogs, grass snakes, muntjac and roe deer. The development is thus environmentally unsustainable (it does not contribute to protecting and enhancing our natural, built and historic environment; nor does it help to improve biodiversity). Specifically, the development is contrary to the principles expressed in paragraphs 109 and 118 of the NPPF.

11. Construction Traffic. The route for Construction Traffic is unsuitable. The proposed route will cause considerable pollution and congestion on Heath Road, with the school and Health Centre, and Green Road which has on-street parking in the built-up area. Green Road, which is barred to HGVs, already has significant traffic problems which will increase further if the Green Road application (2112/16) is approved. The development is thus economically unsustainable (the land is not in the right place).

12. Surface Water Drainage. Surface water drainage in Rags Lane is already inadequate and there is frequent flooding, particularly near the Broomhill Lane junction and where Rags Lane joins The Street. It is therefore of concern that the surface water strategy/flood risk assessment submitted with the planning application is unacceptable to Anglian Water. Any decision on the

application should be deferred until a surface water plan has been agreed with Anglian Water. The development is thus environmentally unsustainable (the land is not in the right place).

13. Rags Lane and Drinkstone Road Safety. As it is without footpaths, the narrow Rags Lane is already unsafe for pedestrians and will be dangerous for residents of the new development who will have to use the route to walk or cycle to the village centre. Rags Lane is also part of National Cycle Route 51. As access to the A14 from the site will lead through the heavily congested pinchpoint in Green Road, many vehicles from the development will turn right and right again to access Rags Lane from the Broomhill Lane end making Rags Lane even more dangerous. Access to The Street from Rags Lane is already very difficult.

There will be considerable danger to pedestrians in Drinkstone Road which is narrow and has no pavements. Although there is no proposed formal pedestrian exit from the site into Drinkstone Road, it will still be used by pedestrians, particularly parents and children going to the village school who will take this shorter route. Drinkstone Road is much used at present by recreational walkers and for them and pedestrians from the site the traffic from the development will be hazardous. The development is thus economically unsustainable (the land is not in the right place) and socially unsustainable (it does not support strong, vibrant and healthy communities).

14. Previous Applications for Development of this Site. A previous application for 12 dwellings on this site was refused on the grounds that a) the junctions of Rags Lane with both The Street and Broomhill Lane have substandard visibility and the junction of Drinkstone Road (formerly Plough Lane) with Green Road is similarly substandard. Dangers would be created by a material increase in the slowing and turning movements b) that foul sewerage in the area is inadequate to cope with the proposed 12 dwelling development which if approved would cause sewerage problems downstream c) the development would extend the village into open countryside to the detriment of the character and appearance of the area and the amenities of the residents of adjoining properties. Nothing has changed since this refusal. The development is thus economically unsustainable (the land is not in the right place) and socially unsustainable (it does not support strong, vibrant and healthy communities).

15. Unsuitability of the Site Location. Whatever modifications are made to the design of the Rags Lane site it will remain unsuitable for development because most of the traffic it creates will go through the already congested historic core of Woolpit. The development is thus economically unsustainable (the land is not in the right place) and environmentally unsustainable (it does not contribute to protecting and enhancing our built and historic environment).

Your Ref: DC/18/00721
Our Ref: 570\CON\1148\18
Date: 2nd May 2018

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

Email: planningadmin@babberghmidsuffolk.gov.uk

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

For the Attention of: John Pateman-Gee

Dear John

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN DC/18/00721**

PROPOSAL: Full Planning Application- Erection of 45 no. dwellings and creation of new vehicular access, open space and associated infrastructure (amended application to previously withdrawn DC/17/02767).

LOCATION: Land on The South Side of, Rags Lane, Woolpit, Suffolk

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

For the application to be acceptable by Suffolk County Council as the highway authority, we would like the following to be considered:

- The carriageway widths of Drinkstone Road are too narrow in places – we feel that the minimum dimension we can accept for the intensification of the area is 4.8m from it's junctions with Green Road to Broomhill Lane, approx. length 425m. Due to the intensification from the development, this will allow 2 vehicles to pass safely without mounting the highway verges.
- There remains the concern of no footway from the development to the village centre. Rags Lane is proposed to be the pedestrian route into the village core but with no footway provision, the pedestrians must walk in the road for approximately 200m. Although the applicant has provided some proposals to highlight to drivers there may be pedestrians in the road, we feel they are not sufficient. Also, Drinkstone Road is the most direct route to the primary school and with no footway, vulnerable pedestrians will need to walk in the road. As there is not adequate verge for pedestrians to step off the highway on Rags Lane or Drinkstone Road, it is not considered a sustainable location from a transport policy perspective.

- The proposed highway improvements at Drinkstone Road/Green Road are subject to the appeal decision on a planning permission refusal for another application within Woolpit. Therefore, if the refusal is upheld, the proposed mitigation cannot be delivered and the highway authority will be minded to refuse this application.
- The parking provision for Plots 13 and 29 - The parking provision is to be as the Suffolk Guidance for Parking 2015 and although the guidance states that tandem parking is acceptable in some instances, we consider it is not acceptable in front of a garage; this is to be discouraged as it will lead to on-street parking.
- We still consider the number of dwellings proposed is not to scale and inappropriate for the size of the plot so the areas to manoeuvre vehicles is considered inadequate therefore, unsafe.

The increase in pedestrians walking in the road will be detrimental to highway safety and contrary to the objectives of the National Planning Policy Framework (NPPF). The lack of a linking footway to the village core will also encourage a probable increase in unsustainable methods of travel to and from the site by future residents. The NPPF identifies as a core principle that development should be focused in locations where car travel is minimised; actively make the fullest use of public transport, walking, and cycling. This location with poor pedestrian connectivity is not able to maximise sustainable modes of transport therefore, does not provide safe and suitable access for all people as required by the NPPF:

- Paragraph 32 - safe and suitable access to the application site cannot be achieved for all people, in this case pedestrians.
- Paragraph 34 – the location of the site and the lack of footway links do not allow sustainable travel modes to be maximised.
- Paragraph 35 – the application site is not located where sustainable transport modes can be exploited for the movement of people. Priority is unable to be given to pedestrians due to lack of safe footway routes and the location does not allow potential conflicts between pedestrians and traffic to be minimised.
- Paragraph 38 – Although the site does have key facilities within walking distance the lack of suitable footway connections will deter pedestrians from walking to them.

Therefore, we would recommend that permission for the application be refused as the proposal contravenes the NPPF.

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development

Your ref: DC/18/00721
Our ref: Woolpit – Land on the South
Side of Rags Lane 00054172
Date: 06 April 2018
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Mr John Pateman-Gee,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich, Suffolk,
IP1 2BX

Dear John,

Woolpit: Land on the South Side of Rags Lane – developer contributions

I refer to the full planning application for the erection of 45 no. dwellings and creation of new vehicular access, open space and associated infrastructure (amended application to previously withdrawn DC/17/02767).

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £9,720 towards libraries provision and a contribution towards temporary classroom costs.

This consultation response deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Woolpit. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

The District Council will also need to consider the s106 pooling limitations because if SCC accept individual contributions from a number of sites then there is a strong

likelihood that the limit of five for any one infrastructure project, imposed by CIL Regulation 123, would be exceeded, leading to a future shortfall in the funding of the overall projects

The requirements being sought here would be requested through S106A contributions as they fall outside of the adopted 123 list. The details of specific S106A contribution requirements related to the proposed scheme are set out below:

- 1. Education.** NPPF paragraph 72 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.’

The local catchment schools are Woolpit Primary Academy, Ixworth Free School and Thurston Community College.

Pupil yields

School level	Minimum pupil yield:	Required:
Primary school age range, 5-11:	10	10
High school age range, 11-16:	7	7
Sixth school age range, 16+:	2	2

*4 x 1 bed houses have been excluded from the calculation.

Primary School

The DfE publishes Area Guidelines (Building Bulletin 103) for schools which define the minimum areas of school buildings, playing fields, site etc. Woolpit Primary Academy is on a very small and constrained site with no possibility of expanding its boundary unless further land was acquired. It has a capacity of

210 places (1 form of entry) so according to the guidelines its minimum site area (including playing fields) should be 11,220 sq m. It has a site area of 11,973 sqm which excludes an early years setting. It is therefore at the optimum site area for a school of this capacity. Because of the unconventional layout of the site, it is not possible to add permanent accommodation to the school and no money will be spent on any permanent accommodation. However schools can take on extra pupils arising as a “bulge” by providing temporary classrooms. This might happen if there is a sudden spike in the local population, or as in this case, due to new housing developments providing it is only temporary until permanent places are provided elsewhere like a new school.

The interim pupil forecasts for Woolpit Primary Academy show by 2021 the numbers are forecast to be 180 while the school’s 95% capacity is 200. Hence there will be 20 spare places at the school, i.e. sufficient places for pupils generated from 80 new houses. The existing Primary School cannot be expanded within its current site.

SCC forecasts show that there will not enough surplus places available at the catchment primary school to accommodate the pupils anticipated to arise from the proposed development when taking into account the resolved to grant planning permission.

Primary pupils mitigation strategy

For many compelling reasons including improving education attainment, community cohesion and sustainability the highly preferred outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Woolpit. Where pupil bulges are anticipated the County Council will consider the provision of temporary classrooms but such an approach is only viewed as an interim measure if the longer term pupil forecasts indicate the need for permanent provision (by way of school expansion or a new school).

A feasibility study has confirmed that the existing school cannot be expanded within its current site, but a second study has looked at how the school could expand if additional land was acquired to the north of the school site. If expansion is possible this would fall under the District’s CIL funding. **As the expansion proposal has not been confirmed, the current approach is for a new primary school for the village with proportionate land and build costs secured by section 106 contributions. Should the expansion be confirmed the obligation in the s106 agreement will cease or be returned.**

Due to the current uncertainty over the scale, location and distribution of housing growth in the Woolpit locality it is not clear at this point in time whether the most sustainable approach for primary school provision is to:

- a. Retain a single primary school for the village by relocating and delivering a new larger school; or,
- b. Retain the current primary school and deliver a second (new) primary school for the village.
- c. Whichever strategy is the most appropriate a site of a minimum size of 3 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs). The site would be big enough to allow for futureproofing should the school need to expand further.
- d. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 10 primary age pupils requiring funding from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 45 dwellings it is calculated that 10 primary age pupils will arise
- Therefore 10 pupils x £16,429 per place = **£164,290 (2017/18 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £741,316 for a 3 hectare site and equates to £1,765 per pupil place. For the proposed development, this equates to a proportionate land contribution of 10 places x £1,765 per place = **£17,650.**

*Total primary school 106 contribution - £164,290 + £17,650 = **£181,940***
*£181,940 / 45 Dwellings = **£4,043 per dwelling***

At present no land has been identified for education use within Woolpit, but SCC will work closely with Mid Suffolk DC to identify a site of 3 ha. Even though there is currently no identified new school site in terms of the CIL regulations, the 'project' required to support significant levels of developer led growth is the need for a new primary school.

Secondary Schools

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. Current forecasts identify sufficient surplus places available for pupils forecast to arise from the proposed development, however when taking into account other development in the catchment it is likely expansion will be required which would fall under CIL.

Against the anticipated level of housing growth across the wider area, a full assessment of secondary school requirements is in the process of being analysed with the initial view that in due course a new secondary school will be needed in the vicinity of the A14 corridor. The best estimate of current cost is in the region of £25m, with a site of 10 hectares.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare. This new challenge has increased the assumptions on the overall need for full-time equivalent (FTE) places.

This development is the Woolpit ward where the only provider is Woolpit Arc. There is a predicted deficit of 24 places. This proposed scheme would result in approximately 8 FTE pre-school places arising. Based on the expected scale of development in Woolpit, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 5 FTE places of the total 30 who would be accommodated within the new setting, could be calculated as follows (costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 30 place setting
- £500,000/30 early years pupils = £16,666 per place

- From 45 dwellings there is the need for 5 additional places
- Therefore 5 pupils x £16,666 per place = **£83,330 (2017/18 costs)**

A new early years setting in the village would be required even if a new primary school is not delivered and this would likely be located on the extended primary school site.

N.b. Higher place costs due to higher ration of 2-4 year olds per house (0.15 yield), and a higher number of children who are eligible for 30 hours a week free childcare than previously calculated.

- 3. Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be co-ordinated by Christopher Fish of Transport Strategy, Strategic Development, SCC.

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

- 4. 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.

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

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer

Strategic Development – Resource Management

cc Neil McManus, SCC
Sarah Hamond, SCC
Chairman – Woolpit Parish Council
Christine Thurlow, MSDC
Chris Fish, SCC

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Endeavour House
8 Russell Road
Ipswich IP1 2BX.

Enquiries to: Hannah Cutler
Direct Line: 01284 741229
Email: Hannah.Cutler@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_00721
Date: 03/04

For the Attention of John Pateman-Gee

Dear Mr Isbell

**Planning Application DC/18/00721 – Land on the South Side of Rags Lane, Woolpit:
Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. The site is a large area that has previously had no archaeological investigation, close to the core of Woolpit. It is also near to finds of Roman brooches (DRK 005), a possible Roman Road remnant (DRK 007), and finds of medieval (WPT 047) and Bronze Age material (WPT 017). Thus, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following conditions would be appropriate:

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

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

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

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

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

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made based on the results of the evaluation.

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

Please do get in touch if there is anything that you would like to discuss, or you require any further information.

Yours sincerely,

Dr Hannah Cutler

Archaeological Officer
Conservation Team

From: Andrea Stordy
Sent: 27 March 2018 12:07
To: BMSDC Planning Mailbox
Subject: FAO: John Pateman-Gee

Planning Application: DC/18/00721/FUL
Location: Woolpit, Land South of Rags Lane, North of Drinkstone Road,, IP30 9SG

Good Afternoon,

Please be advised that we have made formal comment on Land South of Rags Lane, North of Drinkstone Road, Woolpit, IP30 9SG, under the withdrawn planning application DC/17/02767, which we note has been published. This may remain in place for planning application DC/18/00721/FUL, and any other planning application that may be made at Land South of Rags Lane, North of Drinkstone Road, Woolpit, IP30 9SG.

If you have any queries regarding this planning application or site, please email your requests to water.hydrants@suffolk.gov.uk, quoting Fire Ref.: F310974.

Kind regards,

Sent on behalf of the Water Officer

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

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

From: Denis Cooper <Denis.Cooper@suffolk.gov.uk>

Sent: 18 December 2018 11:32

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

Subject: DC/18/00721- Land On The South Side Of, Rags Lane, Woolpit, Suffolk

Dear John Pateman-Gee,

Comments on Surface water Drainage and local flooding from Suffolk County Council's Flood and Water Management team

I have reviewed the following recently submitted documents (dated 13 November 2018 on the web site) and would now advise you these are acceptable.

- Foul and surface water drainage design (Revised Nov 2018 includes maintenance proposals)
- G01160/02/100 rev A foul and surface water drainage layout
- G01160/02/101 rev A foul and surface water long sections
- G01160/02/102 rev A surface water exceedance flow paths
- G01160/02/103 Cross sections of lagoon

We would however suggest warning sign board(s) are incorporated close to the proposed pond together with deterrent vegetation planted around the pond.

regards

Denis Cooper

Flood and Water Engineer

Flood and Water Management

Growth, Highways and Infrastructure

Suffolk County Council

Tel: 01473 260907

email: denis.cooper@suffolk.gov.uk

Useful Links

[SCC Guidance on Development and SW flood risk](#)

From: Nathan Pittam
Sent: 15 June 2018 10:33
To: John Pateman-Gee
Cc: BMSDC Planning Area Team Blue
Subject: DC/18/00721. Land Contamination.

Dear John

EP Reference: 242561
DC/18/00721. Land Contamination.
Land on the south side of, Rags Lane, Woolpit, BURY ST EDMUNDS, Suffolk.
Full Planning Application - Erection of 45 no. dwellings and creation of new vehicular access, open space and associated infrastructure (amended application to previously withdrawn DC/17/02767)

Many thanks for your request for comments in relation to the above application in light of the newly submitted information. I can confirm that nothing submitted relates to land contamination and as such I have no additional comments to make in relation to the application.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00027345
Local Planning Authority:	Mid Suffolk District
Site:	Land On The South Side Of Rags Lane, Woolpit
Proposal:	Full Planning Application- Erection of 45 no. dwellings and creation of new vehicular access, open space and associated infrastructure (amended application to previously withdrawn DC/17/02767).
Planning Application:	DC/18/00721

Prepared by: Pre-Development Team

Date: 12 April 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 Elmswell Water Recycling Centre that will have available capacity for these flows

Section 3 – Foul Sewerage Network

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

Section 4 – Surface Water Disposal

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

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

Section 5 – Trade Effluent

- 5.1 Not applicable
-

Section 6 – Suggested Planning Conditions

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

Surface Water Disposal (Section 4)

CONDITION

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

REASON

To prevent environmental and amenity problems arising from flooding.

FOR THE ATTENTION OF THE APPLICANT:

Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
 - Development size
 - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
 - Connecting manhole discharge location (No connections can be made into a public rising main)
 - Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
 - Feasible mitigation strategy in agreement with Anglian Water (if required)
-

Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
 - Development hectare size
 - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website - <http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation>. For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
 - Connecting manhole discharge location
 - Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)
-

From:Jonathan Duck
Sent:4 Jul 2018 13:34:20 +0100
To:John Pateman-Gee
Cc:BMSDC Planning Area Team Yellow
Subject:DC/18/00721 Land on the south side of Rags Lane, Woolpit

Hello John,

This application relates to the proposed development of 45 houses on land to the west of the Woolpit CA. A previous application was submitted for 60 dwellings on the same site, reference no. DC/17/02767, which was withdrawn. The Heritage Team made comments previously, and their position remains consistent. There will be a low level of harm to the significance of the assets as defined in the Heritage Statement, including Woolpit CA.

There is acknowledgement of the SPS concerns in regard to the impact of offsite highway works and the heritage consultants' focus on the harm to the listed building known as Mullions, but on balance the impacts on the character and/or appearance of the CA and on the settings of the various listed buildings noted in the Heritage Statement, is limited.

In terms of the NPPF, the low level of 'less than substantial harm' must be weighed against the public benefit of the proposed development.

Joff

Dr Jonathan Duck BSc (Hons) MSc PgDip IHBC FRSA

Heritage and Design Officer
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email: jonathan.duck@baberghmidsuffolk.gov.uk
web: www.babergh.gov.uk www.midsuffolk.gov.uk

Please note: I do not work on Fridays

Please be advised that any comments expressed in this email are offered as an informal professional opinion unless otherwise stated and are given without prejudice to any decision or action the Council may take in the future. Please check with the email's author if you are in any doubt about the status of the content of this email. Any personal information contained in correspondence shall be dealt with in accordance with Mid Suffolk and Babergh District Council's Data Protection policy and the provisions of the Data Protection Act as found on both Council's websites.