



HAUGHLEY PARISH COUNCIL

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Mid Suffolk District Council
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19 September 2018

Dear Sirs

**DC/18/03592 - Former Poultry Processing Plant - Haughley Park, Haughley, Stowmarket
IP14 3JY. Application for Outline planning permission
Proposed development for 149 dwellings at Haughley Park**

Haughley Parish Council considered this application at their meeting 19th September and unanimously wish to record their strong objection to these proposals. In reaching this opinion, this Council deliberations included the following matters:

The proposal is for 149 dwellings on a site adjacent and close to a Grade I Listed Building. Whereas much of the site may be classified as Brownfield, part of the site is Green field and surrounded on three sides by the Grade 1 principal dwelling with adjacent and nearby buildings including a Grade II structure and the accompanying gardens and parkland. This Council is of the opinion that the proposed development would be detrimental to the Grade 1 principal building together with the adjoining and nearby buildings and structures.

The provision of a new development with 149 dwellings would effectively constitute a new village (at least a hamlet) to be built over a short period of perhaps a few years, whereas nearly all rural villages in Suffolk of similar size have developed over a period of centuries and thus incorporate a wide variety of sizes, styles and building materials. The proposed development would be over double the size of Haughley Green which comprises the largest hamlet (as opposed to the village of Haughley) in the Parish of Haughley. The proposed development would be larger than many villages in Suffolk.

The site is remote from any settlement, the nearest being Wetherden at about 1½ miles from the proposed development site with Haughley New Street a similar distance, being the nearest settlement in the Parish of Haughley, but there is no shop or public house in Haughley New Street. The site is outside and distant from any settlement boundary, the nearest settlements being Haughley New Street, Wetherden, Elmswell, Woolpit and Haughley. The locality for the proposed development is in the Countryside.

This Council is of the opinion that the provision of infrastructure for the proposed development is seriously inadequate. Facilities within Wetherden are very limited, with further facilities available in Haughley, Elmswell and Woolpit.

There is a bus service which serves the four villages identified, but the distance from the proposed development site to the nearest bus stop is about 1½ miles. Even if a footpath is provided to the side of the road that is a continuation of the road through Haughley New Street, the distance would be likely to deter all but the most determined users of such a service. We have not received any assurances that a footpath to the side of Park Road into/out of Wetherden is being considered. Such lack of provision of a footpath should be considered as hazardous to pedestrians wishing to utilise facilities within Wetherden.

The remoteness of the site from normal facilities will almost certainly result in the vast majority of movements of people to and from the proposed development site will be by motor vehicle (cars, vans, lorries). This will substantially increase the number of vehicle movements in the area, some of which are narrow, being restrictive for cars to pass each other travelling in opposite directions.

Access to the proposed development site would be through the parkland at Haughley Park via a single private roadway, such that there would be no alternative provision for access in the event that this access route cannot be used for whatever reason.

The developers have suggested to members of this Council that due consideration has been given to the tentative style for the dwellings. This Council is of the opinion that the tentative style of housing identified in their application and publicity material does not adequately reflect the broad range of styles, sizes and materials used for local and rural housing in this part of Suffolk.

In addition, we ask Mid Suffolk District Council to consider the following:

1. The National Planning Policy Framework 2012, paragraphs

126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that **heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance**. In developing this strategy, local planning authorities should take into account:

132. **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.** The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. **As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.** Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. **Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.**

2. The National Planning Policy Framework 2018, paragraphs

103. The planning system should actively manage patterns of growth in support of these objectives. **Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.** This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

When considering development proposals

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location;

111. **All developments that will generate significant amounts of movement should be required to provide a travel plan**, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

118. Planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land **within settlements** for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

Mid Suffolk District Council

3. MSDC has declared that there is a 6½ year supply of land, thus allowing District Planning policy to be enforced.
4. The Haughley Park site is designated as being in the Countryside; MSDC policy is against allowing development in the Countryside.
5. MSDC policies reiterate the need to protect historic buildings and sites, which in this matter includes a Grade 1 listed building with adjoining and nearby buildings, including a Grade ii listed building, and parkland.
6. MSDC has produced a schedule of “SHELAA” sites following a ‘call for sites’; the site for this proposed development at Haughley Park was NOT included in this schedule.

Haughley Neighbourhood Plan

7. The Submission Plan of the Haughley Neighbourhood Plan as drafted and approved by Haughley Parish Council 19 September 2018 includes policies quotes below. Whereas the document is yet to be submitted to Mid Suffolk District Council for their consideration and if thought

appropriate formal adoption, the document as drafted expresses the views and aspirations of Haughley Parish Council and follows many months of consideration, including consultation with residents in many ways such as in writing and at numerous meetings, statutory bodies and interested persons.

8. POLICY HAU1 HAUGHLEY'S SPATIAL STRATEGY

Settlement Boundaries are identified on the Proposals Map PM2, PM3 and PM4. Within these boundaries, development shall be permitted where;

- It is of a scale, density and character appropriate to the location;
- Retention of the site in its present state does not form an essential part of the local character;
- Development would protect and enhance local features of green space, landscape, ecological or historic importance; and
- There is the necessary infrastructure of drainage, sewerage, water supply, electricity, road capacity, school capacity and health services to serve the development, or that it can be made available in time to serve the development.
- **Outside Settlement Boundaries, only development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in this Plan will be permitted.**

9. POLICY HAU6 SITES FOR COMMERCIAL AND INDUSTRIAL DEVELOPMENT

Commercial and industrial developments will be supported where they are situated on the brownfield sites of;

- The ex-Little Chef building adjacent to the Travelodge Hotel situated on the south side of the old A14, with acceptable Usage Classes A3 and B2,
- **The previous commercial areas of Haughley Park, with acceptable Usage Classes B1 and Bs, and**
- The Tothill site surrounding and adjacent to the BP Garage and retail outlets on the north side of the Old A14 leading towards Stowmarket, with acceptable Usage Classes A1, A3 and B1.

as identified on the Proposals Maps PM5 and PM6.

10. POLICY HAU7 PROTECTION OF EMPLOYMENT AND EXISTING BUSINESSES

Proposals for non-employment use on sites and premises used and/or designated on the Proposals Maps PM5 and PM6 for employment purposes, will only be permitted where;

- **It will not result in a loss of employment provision in the Neighbourhood Plan area,**

- There is sufficient supply of alternative and suitable employment land available within the Neighbourhood Plan area or in adjacent towns and villages to meet local employment job growth requirements,
- It can be demonstrated that the current employment use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months,
- The existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment site,
- An alternative use or mix of uses would assist in urban regeneration and offer greater benefits to the community in meeting local businesses and employment needs,
- It is for an employment related support facility such as employment training/education, workplace crèche or industrial estate café, and
- An alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment site.

11. POLICY HAU9 DEVELOPMENT AFFECTING HAUGHLEY'S HISTORIC ENVIRONMENT

To ensure the conservation and enhancement of Haughley's historic environment, proposals should;

- Preserve or enhance the significance of the Heritage Assets of the village, their setting and the wider village,
- Retain buildings and spaces, the loss of which would cause harm to the character or appearance of the Conservation Area,
- Contribute to the local distinctiveness, built form and scale of Heritage Assets through the use of appropriate design and materials,
- Be of an appropriate scale, form, height, massing, alignment and detailed design which respects the village's character, appearance and its setting,
- Demonstrate a clear understanding of the significance of the asset and the setting in which the Heritage Asset sits, alongside assessment of the potential impact of the development on the Heritage Asset and its setting,
- Provide clear justification for any works that would lead to harm or substantial harm to a Heritage Asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal, and
- Substantial harm to or a loss of a Grade II listed building should be exceptional. **Substantial harm to or a loss of a Scheduled Monument or Grade I listed building should be wholly exceptional.**

In particular, development proposals will be supported where they;

- Achieve continuity in street frontage building lines set on the back edge of the pavement,
- Maintain the historic pattern of development by respecting the historic grain associated with historic plots and the historic morphology of development in the immediate area,

- Reflect the proportion of solid to void found in the elevations of traditional buildings and employ robust detailing, avoiding the use of applied features or detailing,
- Reinforce local identity by the use of the traditional materials used in the Conservation Area, and
- Re-use traditional buildings which contribute to townscape quality, and
- Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework. SCC Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the NPPF and Local Plan policies are met. SCC Archaeological Service can advise on the level of assessment and appropriate stages to be undertaken.

12. POLICY HAU15 PROTECTION OF RURAL LANDSCAPE

Within Settlement Boundaries, visually important open spaces, as identified on the Proposals Map PM2, will be protected from development because of their contribution to the character or appearance of their surroundings and their amenity value to the local community.

All developments should be expected to minimise impacts on the landscape and to enhance landscape character wherever possible. Development will not be permitted outside the settlement boundary unless in exceptional circumstances or where there is a specific allocation in the Neighbourhood Plan.

Elsewhere in the Plan area, outside the Settlement Boundaries, there is a need to protect the environment and landscape value that provides the setting of the village. Generally, development will not be permitted in this area unless in exceptional circumstances or where there is a specific allocation in the development plan (the Neighbourhood Plan, Mid Suffolk Local Plan or County Council Minerals and Waste Plan).

Yours faithfully



Gerald Brown
Acting Proper Officer
Haughley Parish Council

Consultee Comments for Planning Application DC/18/03592

Application Summary

Application Number: DC/18/03592

Address: Former Poultry Processing Plant Haughley Park Haughley Stowmarket IP14 3JY

Proposal: Outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works

Case Officer: John Pateman-Gee

Consultee Details

Name: Mr Peter Dow

Address: Blackbourne Community Centre, Blackbourne Road, Elmswell Bury St Edmunds, Suffolk IP30 9UH

Email: clerk@elmswell.suffolk.gov.uk

On Behalf Of: Elmswell Parish Clerk

Comments

Elmswell Parish Council objects to this application and urges refusal on the following grounds:

1 It is disingenuous to present this proposal as, a new rural village. The application avoids any mention of the infrastructure that a village community needs. Rather it relies entirely upon the surrounding villages to furnish these needs by way of retail access, entertainment, community facilities, educational and medical provision. These resources are overstretched and further threatened by similar off-plan opportunistic developments already permitted, requiring, for example, a new primary school in Elmswell before an influx such as is threatened here can be accommodated.

2 Despite this reliance on the already stretched adjacent communities the statement that there are, limited benefits in undertaking a public consultation exercise, runs counter to common sense and to the justice that these host villages deserve in light of the considerable imposition upon their stretched resources as is buried within this proposal.

3 The site is in the countryside outside of any Settlement Boundary within which new development will properly take place. Exceptions which would support the local economy do not include the opportunistic development of an isolated large housing estate rather than the retention of the employment opportunities which the site offers if redeveloped as a business park or similar, as is happening in the adjacent Warren Farm development.

4 The supporting road network will not support the traffic generated by this proposal. Preferred

access to A14 Westward will, clearly, be along the old A45 to Warren Lane at Elmswell and thence via Church Road to the roundabout. This requires the use of 2 junctions in Elmswell already identified in the Parish Councils recent independently commissioned professional traffic survey as close to capacity. The School Road / Church Road junction is already at capacity given the recent granting of permissions in the village for large ad hoc housing estates, just such as proposed here. The implications for Wetherden and Haughley New Street, already suffering the blight of the expansion of the Lawn Farm Quarry workings, are equally dire.

5 NPPF clearly requires that the Planning system should be genuinely Plan led. This proposal is not part of any plan and simply seeks to impose a large, isolated housing estate in the countryside on the basis that this is preferable to empty factory buildings. The emerging BMSDC Joint Local Plan is the vehicle which will provide the framework for sustainable rural development. It states that, The location of development is a critical determinant on its sustainability and has a significant effect on the extent to which it contributes socially, economically and environmentally. This chimes perfectly with the strictures of the NPPF. This proposal fails entirely to satisfy any one of the contributory factors listed. It should be referred to a Strategic Planning exercise where the true effects and implications on the hinterland on which it seeks to impose itself can be evaluated and mitigated appropriately.

In reaching these conclusions, Councillors had reference to the following Policies within the Mid Suffolk Core Strategy, Core Strategy Focussed Review, The Saved 1998 Local Plan, the NPPF as revised:

CS1 settlement hierarchy

CS2 development in the countryside

CS5 development should conserve the overall character of the area

CS6 development should provide appropriate and accessible infrastructure

CS11 protecting existing employment sites from inappropriate loss to other uses

FC1.1 proposals must demonstrate the principles of sustainable development

FC3 endorsing a good range of employment sites across the District

E4 refuse proposals likely to prejudice continued industrial or commercial purposes

H7 controlling proposals for new housing in the countryside

T10 the capacity of the existing road network

NPPF the Planning system should be Plan-led

NPPF development should be shaped by engagement between plan-makers and communities

NPPF strategic policies should set out an overall strategy for pattern and scale of development

NPPF applications to be determined in accordance with the development plan

NPPF applicants should work closely with those affected by their proposals

Peter Dow CiLCA

Clerk to Elmswell Parish Council

18.09.2018

Planning application DC/18/03592, Former poultry processing plant, Haughley Park IP14 3JY

Response of Wetherden Parish Council

Wetherden Parish council wishes to object to this planning application for the demolition of the existing industrial buildings and the erection of 149 houses.

While the need for housing, particularly affordable housing, is recognised, we feel strongly that this is the wrong location, on a number of grounds:

Traffic

The plan would only involve one route for egress and exit from the site. This junction, from Haughley Park onto the old A45 road is a dangerous one, with a blind corner west bound, and with a speed limit of 60 mph. Gaining access to the A14 for west bound traffic would mean increased vehicles through the village of Wetherden via Park Road, which is narrow, and has a weight limit. Vehicle numbers are already significantly increased due to the Lawn Farm quarry extension and the new industrial estate.

Public transport

Access to public transport would be very limited. The current bus service cannot be routed via Park Road, Wetherden, due to width and weight restrictions. The bus stop at the Maypole pub cannot be accessed by footpath as Park Road is too narrow. Access to the nearest train station, at Elmswell, is impossible without the use of a car or bike. The roads around the village are dangerous for pedestrians and cyclists, and will be exacerbated by current plans for extra housing in Elmswell, plus the proposed extension of Lawn Farm Quarry.

Infrastructure

The current infrastructure is not suitable for additional housing. There are no local schools accessible on foot or by bike. There is no shop in Wetherden, and the facilities in nearby Elmswell, and the health centre at Woolpit, are already at breaking point. We understand that no facilities are planned for the site, meaning increased traffic and potential for accidents as many more people attempt to use the very limited facilities. There are few local jobs so commuting would be essential, again by car. This is not a sustainable situation.

Heritage

Haughley Park is an important historical site in a parkland setting. It is important to the village of Wetherden, used currently for private and public leisure and sporting events. This service would not be able to continue under the proposed plan as the residents of the 149 houses would object to the noise, and traffic created by these

events. Haughley Park is outside the village envelope, and we see no sign of any housing there being sustainable. Damage to the ancient woodlands would be caused.

Conclusion

In conclusion we feel that there are already sufficient significant housing developments in the area, and that 149 extra houses are not only not necessary, but would put undue strain on the infrastructure and be unsustainable. We urge MSDC to reject this planning application.

Jen Larner
Clerk

11 September 2018

From: David Pizzey
Sent: 20 August 2018 10:52
To: John Pateman-Gee <John.pateman-Gee@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: DC/18/03592 Former Poultry Processing Plant , Haughley Park, Haughley

John

I have no objection to this application at this stage as there appears to be little conflict between the development, based upon the indicative masterplan, and any significant trees/hedges on site. The arboricultural report provides an accurate assessment of the condition and constraints presented by trees and the appropriate measures for their protection. Although a small number of trees are proposed for removal these are generally of limited amenity value and all important (category A) trees are scheduled for retention. Should the layout design alter then updated tree protection measures, including a Tree Protection Plan, will be required. A detailed Arboricultural Method Statement, based upon a finalised layout design, should also be submitted but this can be dealt with under condition.

If you require any further input please let me know.

Regards

David Pizzey FArborA

Arboricultural Officer

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www.babergh.gov.uk and www.midsuffolk.gov.uk Babergh and Mid Suffolk District Councils – Working Together

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: John Pateman-Gee— Area Manager Yellow team Planning

From: Julie Abbey-Taylor, Professional Lead – Housing Enabling

Date: 21/08/2018

SUBJECT: - Application Reference: DC/18/03592

Proposal: Application for Outline Planning permission 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works at land on the former poultry processing plant, Haughley Park, Haughley.

Key Points

1. Background Information

A development proposal for up to one-hundred and fourty-nine (149) residential dwellings.

This is an open market development and should offer 52 affordable housing units which = 35% policy compliant position.

2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

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.

Ref3Estimated 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.**770** applicants registered for affordable housing in Mid Suffolk at June 2018.

2.8 This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **770** applicants registered is the important number.

3. Preferred Mix for Open Market homes. No specific detail has been provided for the open market mix (97 dwellings). To address local and district needs, we would like to see that there are: -

- Minimum of 10 x 2 bed bungalows/chalet bungalows
- Minimum of 6 x 3 bed bungalows/chalet bungalows
- Minimum of 20 x 2 bed houses
- Maximum of 35 x 3 bed houses
- Maximum of 20 x 4 bed houses

The inclusion of bungalows/chalet bungalows would be welcomed as this will provide opportunities for older people to downsize.

- 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 45 applicants registered who have a connection to Haughley.

4.2 **52** of the proposed dwellings on the development should be for affordable housing.

However due to the location of this site in relation to public footpaths, cycle routes, public transport and access to shops and public facilities, the provision of on-site affordable housing is not considered to be sustainable for lower income households. Therefore, we would seek a **Commutted Sum contribution secured through the S106 agreement if planning consent is given to this application.**

The calculation will be based on the on-site provision particulars set out below: -

Rented (39): -

- 4 x 1 bed 2-person flats @ 50sqm
- 4 x 1 bed 2-person houses @ 58 sqm
- 6 x 2 bed 4-person bungalows @ 70 sqm
- 11 x 2 bed 4-person houses @ 79sqm
- 3 x 3 bed 5-person houses @ 93 sqm

Shared Ownership (13): -

- 8 x 2 bed 4-person houses @ 79 sqm
- 5 x 3 bed 5-person house @ 93 sqm.

The above mix provides a commuted sum calculation is a total of £3,003,080 which should be included in the S106 agreement.

5. Other requirements for the S106 agreement:

- The S106 agreement should include a trigger point for the payment of the commuted sum as 33% upon commencement of the development, second payment of 33% on the occupation of the 50th dwelling and the remaining 34% upon occupation of the 100th open market dwellings.

Julie Abbey-Taylor, Professional Lead – Housing Enabling



Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 0345 60 66 087, Option 1 or email planningliaison@anglianwater.co.uk.

AW Site 1150/1/0000849
Reference:

Local Mid Suffolk District
Planning Authority:

Site: Former Poultry Processing Plant Haughley Park
Haughley Stowmarket IP14 3JY

Proposal: Outline planning permission (all matters reserved)
except the access point for the demolition of existing
industrial buildings and construction of 149 dwellings

Planning DC/18/03592
application:

Prepared by: Pre-Development Team

Date: 3 September 2018

ASSETS

Section 1 - Assets Affected

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

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

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

Section 3 - Used Water Network

The sewerage system at present has available capacity for these flows via a connection to manhole 2201 should a connection be required to Anglian Water's network. However, we note that at present, an onsite private treatment facility 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

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

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.

FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:

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.ukuds.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)



SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street,
Bury St Edmunds, Suffolk
Tel: 01284 774141
www.suffolk.police.uk

Planning Application (DC/18/03592/Out)

SITE: 149 Dwellings, Playing fields and P.O.S. at former Poultry processing plant, Haughley Park, Haughley, IP14 3JY

Applicant: Amber REI Holdings Ltd

Planning Officer: Mr John Pateman-Gee

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry

Dear Mr Pateman-Gee

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 149 dwellings, playing field, public open space and community orchard at the former poultry processing plant at Haughley Park, Haughley.

I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act.

I take on board that this is an initial outline planning application and that further details will be forwarded by the developers at the Reserved Matters stage. As a result I feel that at present I do not have the level of detail I require to make specific individual comments in relation to 'designing out crime' for this outline application. However, I recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation. Further information can be found at www.securedbydesign.com.

I would further strongly advise the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link:
<http://www.securedbydesign.com/sbd-national-building-approval/>

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

1.0 GENERAL COMMENTS ON PROPOSED PLAN

1.1 I am pleased to note from the developers Design Access Statement (DAS) at part 2, under "Parking", section 6 states "that adequate on-street parking will be designed into the scheme, located close to dwellings and distributed efficiently across the development to cater for visitors. Along with small courtyard parking. A good level of surveillance will be achieved from the dwellings each court is associated with. On plot

parking will be generally located to the side or rear of dwellings, within an individual parking bay and/ or garage, suitably set back from the building line to remove cars from view along the street scene. Innovative solutions for parking will be explored to allow for efficient parking and to make efficient use of land”.

- 1.2 I appreciate that designing parking to also accommodate enough nearby spaces for both home owners and visitors can be a challenge. I hope that most properties will have a securable garage and additional parking at the front of properties, rather than set rear back, which affords no surveillance and also jeopardises the rear of properties to be more susceptible to burglary. Car ports provide no security and so I hope these will not be incorporated.
- 1.3 I note from the DAS at part 2 section 6 under “Landscaping” that the informal footpath will be 2m wide. I urge the developers to make the width of this footpath at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles. I further recommend low growing and regularly maintained vegetation on either side, that will prevent hiding places for any would be offender. (SBD 2016, pages 14-17 at Paras 8.1-8.19 refer). It would greatly assist security and well-being if this area is also well lit.
- 1.4 I am pleased to see that again within the Developers DAS at part 2, section 6 under “Landscape”, the developers have stated they will “arrange windows that create natural surveillance, especially at entrances and on sides that occupants have views over entrance paths and doors”. I hope that will be the case in order to maximise on both formal and natural surveillance of all areas.
- 1.5 I am particularly pleased to see within the DAS part 2 under “Crime Prevention”, it state “The design proposals are based on an understanding of best practice and reference has been made to relevant documents including Manual for Streets, ACPO Secure by Design ‘New Homes 2014.’” (although I would prefer it if the designers adopted guide lines by the more up to date New Homes 2016 guide line).
- 1.6 I am pleased to see again within this section under “Crime Prevention” it state “The proposed Illustrative Masterplan will create an environment which is well designed, attractive, clearly defined and well maintained. People will be able to take pride in their surroundings, feel comfortable and safe and have a sense of shared ownership and responsibility. The development will be clearly defined with no ambiguity as to which areas are private, which are public, and how the two relate to one another”.
- 1.7 I am also pleased to note the remaining sections of the “Crime Prevention” section which go into Secure By Design principles for enclosed rear garden spaces. Along with natural surveillance; well defined routes; no conflict issues; optimum surveillance; no blank gable walls; all parking visible from dwellings; use of high quality boundary treatments; properties facing into streets allowing residents to get to know their neighbours and recognise their cars; all buildings secured to relevant standards as set out in Building Regulations or by the Local Planning Authority and public open spaces and areas of play appropriately lit, promoting natural surveillance and discouraging antisocial behaviour. I hope in all these aforementioned instances this will be the case in order to reduce the risk of crime and promote safe and secure living.
- 1.8 As stated I realise plans are at an early stage, but I do have concerns, bearing in mind the goals that the developers have stated with regard to what looks like the inclusion of two flying freeholds and two rear parking courtyards near to the proposed green area, (pictured right and circled in red). The police strongly discourage the siting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, antisocial behaviour, (including gathering of people) and graffiti, as these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties. Communal parking should be in small groups, close and



adjacent to the front or side of homes and must be within view of active rooms that will provide natural surveillance. Secure By Design (SBD) New Homes 2016 section 1, at para 16 entitled “Car Parking”, (para 16.1- 16.7, pages 22-23 refers). Along with section 3 at para 52, also entitled “Car Parking”, (para 52.1-52.2, pages 62-63 refers).

- 1.9 Should a number of car ports be implemented, I strongly recommend that they are in line with the main property and not set back. That dusk to dawn security lighting is installed to the side of the properties overlooking such installations and if possible the front of the car port is secured with lockable gates. (SBD New Homes 2016, page 62, Para 52.1 refers).
- 1.10 I trust the public open spaces and attenuation areas will be railed off to secure these areas and prevent them from becoming an overspill for unauthorised parking, or antisocial activity by motor bikes or mopeds.
- 1.11 Any play equipment should be installed it should meet BS EN 1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.
- 1.12 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 1.13 All litter bins should be of a fire retardant material.
- 1.14 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading “Communal Areas” refers.

2.0 REFERRALS

- 2.11 **Section 17 of The Crime and Disorder Act 1998** outlines the responsibilities placed on local authorities to prevent crime and dis-order.
- 2.12 **The National Planning Policy Frame work July 2018** in particular:
 - a) **Chapter 8: Promoting healthy and safe communities; Paragraph 91b;** Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, **so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.**
 - b) **Chapter 12: Achieving well-designed places; Paragraph 127(f);** Planning policies and decisions should ensure that **developments create places that are safe**, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; **and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.**
- 2.2 **The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)** Landscaping plays an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime.
- 2.3 **Department for Transport – Manual for Streets (Crime Prevention)** The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that

crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

3.0 BUILDING RECOMMENDATIONS

- 3.1** I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 3.2** As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 replaced the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf
- 3.3** SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>
- 3.4** To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
 - a) All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
 - b) All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
 - c) Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

Developers can apply for National Building Approval membership from Secure by Design (SBD), where members agree to adopt Secure Design principles and can market properties as being Secure By Design approved at the start of building, rather than at the final stages of completion. Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

I would like to see the development, or at least the affordable housing built to Secured by Design SBD New Homes 2016 accreditation. Further information on SBD can be found at www.securedbydesign.com

4.0 FINAL CONCLUSION

To reiterate, my main concerns are:

- a) What looks like the inclusion of two flying freeholds and two rear parking courtyards near to the proposed green area, which provide no surveillance and are a known generator for crime.
- b) That any parking by properties will not be set back, as such areas do not afford surveillance. Instead I hope that most properties will have garages to the side of their properties with additional frontal parking.
- c) That the main public footpath and any other footpaths are at least 3m wide in order to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles.
- d) That public open spaces and attenuation areas will be properly sectioned off and not become overspill areas for unauthorised parking, or provide antisocial activity by motor bikes or mopeds.

Again whilst I acknowledge this is an outline planning application and subject to amendments, (hopefully removing the two flying freeholds and two rear parking areas), I would like to praise the developers for what looks like a well presented set of plans that should assist in the reduction of crime and hopefully allow occupants to feel comfortable and safe and have a sense of shared ownership and responsibility.

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely

Phil Kemp

Designing Out Crime Officer Western and Southern Areas
Suffolk Constabulary,
Raingate Street
Bury St Edmunds, Suffolk, IP33 2AP

From: Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 05 September 2018 16:10
To: BMSDC Planning Area Team Yellow <planningyellow@aberghmidsuffolk.gov.uk>
Subject: DC/18/03592

Application ref: DC/18/03592

Our ref: 256317

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully

Dawn Kinrade
Natural England
Technical Services
Consultations Team
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire, CW16GJ



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: Babergh District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/18/03592

Referring to the planning application referenced above, dated 20 August 2018, application for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works, former Poultry Processing Plant, Haughley, Stowmarket, IP14 3JY, 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 August 2018
Name: David Abbott Highways England: Woodlands, Manton Lane Bedford MK41 7LW <u>david.abbott@highwaysengland.co.uk</u>	Position: Spatial Planner

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

Email: planning@aberghmidsuffolk.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/18/03592

PROPOSAL: **Outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works**

LOCATION: **Former Poultry Processing Plant, Haughley Park, Haughley, IP14 3JY**

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

OVERVIEW

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

- The maximum 85%ile speed recorded on Haughley New Street adjacent to the site is 54mph. There is a proposal to introduce a 40mph speed limit to allow 2.4m x 120m visibility splays.
- The total daily 2-way flow of traffic on Haughley New Street is over 2000 vehicles and the additional vehicles from the development with no intensification from its previous use therefore, will not have a significant impact on the junctions.
- There are a number of slight injury accidents in the area but none have patterns or significant deficiencies to highway safety.

Taking all the above into account, it is our opinion that this development would not have a severe impact (NPPF para 109) therefore we do not object to the proposal.

COMMENTS

The proposal to install a 40mph speed limit approx. 150m west of the access to the development is required in the interest of highway safety as outlined in Drawing No T16026/SK04 & SK05. The intention will be for the developer to enter into unilateral undertaking with SCC to create the Traffic Regulation Order (TRO) to introduce the speed limit.

For the site to be acceptable from a transport prospective, the proposed footway from the site access to the junction to Park Road needs to be extended into Park Road as far as Park View. This is to ensure connectivity to the bus stops and the centre of Wetherden village.

Travel Plan comments;

- There are no measures identified in the Travel Plan on how primary and secondary school pupils will travel to the school by non-car means.
- The Travel Plan document itself is very generic and not site specific, as it has more or less been written in the style for an urban development, not a rural development. Also a traditional Travel Plan is unlikely to work on this site, due to the rural location with extremely limited sustainable transport options. It is more appropriate to use the funds dedicated towards the Travel Plan for hard infrastructure to improve sustainable transport links to the site.
- There is no evidence in the Travel Plan that the existing bus operators have been consulted in regards to the proposed diversions of buses through the site for the residents. There will need to be some evidence of consultation with bus operators incorporated into the Travel Plan at this stage to see if such measure is viable, as developer contributions may be required to enhance and/or divert a bus service to the site (paying attention to the requirements of the Mid-Suffolk CIL 123 list).
- If this Travel Plan is secured, Suffolk County Council (as the Highway Authority) would not want to be involved in the Travel Plan process, as it would be difficult for the County Council to justify resource to oversee a Travel Plan in a rural area, with very little chance of achieving any modal shift. Therefore all references to Suffolk County Council must be removed, unless financial contributions though a Section 106 agreement can be provided to adequately resource Suffolk County Council.
- A Technical Note that takes into account and overcomes these issues will need to be submitted prior to the determination of this application to ensure that suitable sustainable transport mitigation is secured.

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. T16026/SK04 with an X dimension of 2.4m and a Y dimension of 120m 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 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.

3 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.

4 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.

5 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.

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development



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

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

5th September 2018

Dear John,

RE: DC/18/03592 Outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings. Former Poultry Processing Plant, Haughley Park, Haughley

Thank you for sending us details of this application, we have the following comments:

We have read the ecological survey report (The Environment Partnership, July 2018) and we are satisfied with the findings of the consultant.

We note that the consultant has recommended that a Construction Environmental Management Plan (CEMP) should be prepared to ensure appropriate mitigation during the construction process. An EPSM licence is also required for great crested newts.

It is also noted that this application is for Outline planning consent, should consent be granted it must be ensured that any further applications are supported by up to date ecological assessment information when they are determined.

Long term management of all green spaces for the benefit of biodiversity, via the implementation of an adopted management plan (Landscape and Ecological Management Plan (LEMP)) should be secured at the Reserved Matters stage of the application and be approved prior to determination.

Notwithstanding the above, we request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jill Crighton
Conservation Planner

A company limited by
guarantee no 695346
Registered charity no 262777



06 September 2018

John Pateman-Gee
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear John,

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/18/03592

Location: Former Poultry Processing Plant Haughley Park Haughley Stowmarket IP14 3JY

Proposal: Outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works

Thank you for consulting Place Services on the above application.

No objection subject to securing biodiversity mitigation and enhancement measures

Summary

We have reviewed the ecological assessment report (The Environment Partnership, July 2018) supplied by the applicant, relating to the likely impacts of development on Protected & Priority habitats and species.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We support the reasonable biodiversity enhancements that should also be secured by a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.



The ecological mitigation and enhancement measures identified in the ecological assessment report (The Environment Partnership, July 2018) should be secured and implemented in full. This is necessary to conserve Protected and Priority species.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. CONCURRENT WITH RESERVED MATTERS: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.

The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority"

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

2. PRIOR TO COMMENCEMENT: SUBMISSION OF A COPY OF THE EPS LICENCE FOR GREAT CRESTED NEWT

"Works shall not commence in any circumstances unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorizing the specified activity/development to go ahead; or*
- b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence.*



The local planning authority shall be provided with written confirmation that the licence has been granted from the ecologist named on the licence.”

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 and s17 Crime & Disorder Act 1998.

3. PRIOR TO OCCUPATION: LANDSCAPE ENVIRONMENTAL MANAGEMENT PLAN

“A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.

The content of the LEMP shall include the following:

- a) *Description and evaluation of features to be managed, including locations and details of the proposed biodiversity enhancement measures*
- b) *Ecological trends and constraints on site that might influence management.*
- c) *Aims and objectives of management.*
- d) *Appropriate management options for achieving aims and objectives.*
- e) *Prescriptions for management actions.*
- f) *Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) *Details of the body or organization responsible for implementation of the plan.*
- h) *Ongoing monitoring and remedial measures.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.”

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

4. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

“A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no



circumstances should any other external lighting be installed without prior consent from the local planning authority."

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Junior Ecological Consultant
Hamish.Jackson@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



John Pateman-Gee
Mid Suffolk District Council
Planning Department
131, Council Offices High Street
Needham Market
Ipswich
IP6 8DL

Our ref: AE/2018/123165/01-L01
Your ref: DC/18/03592
Date: 06 September 2018

Dear Mr Pateman-Gee

OUTLINE PLANNING PERMISSION (ALL MATTERS RESERVED) EXCEPT THE ACCESS POINT FOR THE DEMOLITION OF EXISTING INDUSTRIAL BUILDINGS AND CONSTRUCTION OF 149 DWELLINGS, PROVISION OF PUBLIC OPEN SPACE INCLUDING PLAYING FIELDS, VILLAGE GREENS, GREEN CORRIDORS, COMMUNITY ORCHARD, LANDSCAPING AND SURFACE WATER ATTENUATION AND ASSOCIATED WORKS.

FORMER POULTRY PROCESSING PLANT HAUGHLEY PARK HAUGHLEY STOWMARKET IP14 3JY

Thank you for your consultation dated 17 August 2018. We have inspected the application, as submitted, and have no objections to the proposal provided that the conditions outlined below on groundwater and contaminated land are included should permission be granted. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Groundwater and Contaminated Land

The site is located approximately 5.5km to the North West of Stowmarket. The bedrock geology is the Crag group (Principle Aquifer), which is overlain by the superficial Lowestoft Formation (Secondary Aquifer, Undifferentiated) on the east of the site and the Croxton Sand and Gravel member (Secondary 'A' Aquifer) on the west side of the site. The majority of the site is in Source Protection Zones 1 (northeast of the site) and 2 (central area). There is a smaller area of Source

Protection Zone 3 in the southwest of the site. The Source Protection Zone in this case is related to the '2 Sister Food Group' licenced abstractions at this location, which may or may not be decommissioned with the closure of the factory and the redevelopment of the site.

We refer to the Land Contamination Report (Phase I Site Appraisal for Elan Homes Ltd. – April 2018) which suggests that the general risk of soil contamination is considered to be moderate. We are pleased to see a Phase I conceptual model of the site indicating sources, pathways and receptors and agree that the finding of the desk study need to be confirmed by intrusive investigation and chemical analysis (as described in Section 5.1 of the Phase I Appraisal).

We advise that leachability testing will be undertaken during the site investigation works to add confidence to a groundwater risk assessment which will also need to be undertaken.

We would also recommend additional site investigation to investigate hotspots including the areas around the above ground tanks, substation and haulage areas. In addition, once demolition has taken place further sampling should take place to show that no previously undetected contamination is present.

The information provided to date has demonstrated that the risks to controlled waters are understood and therefore the following conditions can be appended to any planning condition granted.

Condition 1

No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
- 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

- 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Condition 2

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Condition 3

No development should take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority, shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Condition 4

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason for Conditions 1 – 4

To protect and prevent the pollution of the water environment (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses) in line with National Planning Policy Framework (NPPF; paragraphs 170 and 178), EU Water

Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater Protection Position Statements (2017) A4 – A6, J1 – J7 and N7.

National Planning Policy Framework (NPPF) paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 178).

Condition 5

No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason Condition 5

Infiltration through contaminated land has the potential to impact on groundwater quality.

Condition 6

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason Condition 6

Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

The National Planning Policy Framework paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Further information is provided in Appendix 1.

We trust this information is useful.

Yours sincerely

Miss Charlie Christensen
Planning Adviser

Direct dial 02084 745593

Direct e-mail charlie.christensen@environment-agency.gov.uk

Appendix 1

Advice to Applicant / LPA Sustainable Drainage Systems (SuDS) informative

- 1) Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
- 2) Infiltration SuDS have the potential to provide mobilise pollutants and must not be constructed in contaminated ground. They would only be acceptable if a site investigation showed the presence of no significant contamination.
- 3) Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
- 4) The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
- 5) Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
- 6) SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual ([CIRIA C753, 2015](#)) and the [Susdrain website](#).

For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2017), in particular Position Statements G1 and G9 – G13 available

at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

We recommend that developers should:

- 1) Refer to our '[Groundwater Protection](#)' website;
- 2) Refer to our [CL:AIRE Water and Land Library \(WALL\)](#) which includes the risk management framework provided in [CLR11, 'Model Procedures for the Management of Land Contamination'](#), when dealing with land affected by contamination, and also includes the [Guiding Principles for Land Contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health;

- 3) Refer to our [Land Contamination Technical Guidance](#);
- 4) Refer to '[Position Statement on the Definition of Waste: Development Industry Code of Practice](#)';
- 5) Refer to British Standards BS 5930:1999 A2:2010 *Code of practice for site investigations* and BS10175:2011 A1: 2013 *Investigation of potentially contaminated sites – code of practice*
- 6) Refer to our '[Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination](#)' National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of '[Piling Into Contaminated Sites](#)';
- 7) Refer to our '[Good Practice for Decommissioning Boreholes and Wells](#)'.
- 8) Refer to our '[Dewatering building sites and other excavations: environmental permits](#)' guidance when temporary dewatering is proposed

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/F221415
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 07/09/2018

Dear Sirs

Former poultry processing plant, Haughley Park, Haughley, Stowmarket
IP14 3JY
Planning Application No: DC/18/03592/OUT

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: stuart.wells@pegasusgroup.co.uk

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: 7 September 2018

Planning Ref: DC/18/03592

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING

ADDRESS: Former poultry processing plant, Haughley Park, Haughley,
Stowmarket IP14 3JY

DESCRIPTION: 149 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

Created: September 2015

Enquiries to: Fire Business Support Team
Tel: 01473 260588
Email: Fire.BusinessSupport@suffolk.gov.uk



Dear Sir/Madam

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

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

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

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

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

Dispelling the Myths of Automatic Fire Sprinklers

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

Promoting the Benefits of Automatic Fire Sprinklers

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

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

The Next Step

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

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

Suffolk Fire and Rescue Service

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

Residential Sprinkler Association

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

British Automatic Fire Sprinkler Association

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

Fire Protection Association

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

Business Sprinkler Alliance

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

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

Yours faithfully

Mark Hardingham
Chief Fire Officer
Suffolk Fire and Rescue Service

Your ref: DC/18/03592/OUT

Our ref: Haughley – land at Haughley Park
(former poultry factory) 00050862

Date: 14 November 2018

Enquiries to: Neil McManus

Tel: 07973 640625

Email: neil.mcmanus@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,

Haughley: land at Haughley Park (former poultry factory) – developer contributions

I refer to the proposal: outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works.

A consultation response was submitted by way of letter dated 10 September 2018. New information has since come to light which needs urgent consideration.

Ideally, the County Council would like to see a plan-led approach to housing growth in the Haughley locality, which would also clearly 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, early years and primary school provision. The revised NPPF in paragraphs 38 – 50 sets out the approach to decision-making. In paragraph 41 it says, “The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits.” However, the applicant has failed to resolve with Suffolk County Council an appropriate early years and primary school mitigation strategy. Ensuring that there are sufficient early years and primary school places for the village is a fundamental issue relating to whether this particular development will be acceptable in principle, which is the type of situation reflected in paragraph 42 of the NPPF.

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.

The current village primary school sits on a small constrained site. The site is already well below Building Bulletin 103 space standards for schools. For a 105-place primary school these guidelines suggest a minimum site size of 5,496 square metres, whereas the school actually sits on a site of only 1,496 square metres. For early years further consideration is also required to ensure that local facilities are sufficient to meet the needs of existing and any new residents.

The County Council needs more time to fully consider the implications of this development proposal on local early years and primary school provision for the village of Haughley, including consideration of the options available to mitigate the impacts if this application was granted planning permission. It is also important to have engagement with the local community on this issue, as highlighted in paragraphs 39 and 40 of the NPPF.

On this basis, Suffolk County Council therefore submits a formal holding objection.

However, we are willing to work with the LPA, the applicant and local community in a proactive, positive and creative way in order to ensure that the proposed development will not adversely harm the social conditions of Haughley.

Yours sincerely,

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

cc Sarah Hammond, Suffolk County Council
 Sam Harvey, Suffolk County Council
 Floods Planning, Suffolk County Council
 Robert Hobbs, BMSDC
 Philip Isbell, BMSDC

From: Chris Cornish
Sent: 11 September 2018 15:40
To: John Pateman-Gee <John.pateman-Gee@aberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@aberghmidsuffolk.gov.uk>
Subject: EP Comments - APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/18/03592

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/18/03592

Proposal: Outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works

Location: Former Poultry Processing Plant , Haughley Park, Haughley, Stowmarket IP14 3JY

Environmental protection are concerned properties in located to the southern end of the site in close proximity to the A14 could expose future occupants to excessive levels of noise that would have a significant adverse effect on the quality of life, health and well being of future residents.

Additionally there is no foul drainage plan at this time and there is reference to the use of an existing private treatment plant. I have concerns that any existing plant for business use will not be sufficient and in the first instance the assumption must be to connect to the public mains sewer, especially for a development of this size. This can be dealt with by a prior to reserved matters condition.

With regards to the Noise assessment carried out by PDA acoustics submitted with the application. The assessment has not been carried out in consideration of ProPG – Planning & Noise: new residential development which would be preferable for a development of this nature.

With regards to the assessment methodology there is some uncertainty in the reported daytime LAeq readings. The A14 traffic is heavily influenced by HGV movements from the port of Felixstowe and surrounding distribution infrastructure. The survey has not included the full daytime period when I would expect the road to be busier, as a result the survey has identified daytime noise levels that are the same as the night time levels. I have taken a brief 30 minute survey during a site visit at 14:00 with the SLM located in the position of the southern most dwellings shown in the indicative site layout and the Leq sound levels quickly stabilised at 65dBA.

Noise break in calculations have been used to predict internal noise based on modelling software although the predicted internal noise levels have not been reported but have been used to produce a mitigation strategy that relies on closed windows with enhanced glazing in the most exposed facades. The noise break in is only reported with enhanced glazing in place and requires the future occupant to close the window. Standard insertion loss assumptions would be acceptable for open window internal noise levels.

With regards to the mitigation strategy, the use of enhanced acoustic insulation on the structure itself should be the last resort where noise reduction measures and the use of design and layout of the site (and internal room layout) has been evaluated as far as reasonably practicable.

There is mention of a potential acoustic barrier on the bund to the south of the site with reference to providing mitigation to external amenity areas but it is anticipated that external amenity noise levels will exceed the recommended levels.

The noise assessment will require further consideration that follows a hierarchy of options for noise mitigation that in the first instance uses barriers to reduce noise exposure to external facades, gardens and noise sensitive internal rooms, followed by consideration of the site layout, internal layout and then as a last resort the use of enhance sound insulation to the building itself. Where noise exposure is significantly above recommended guidelines with windows open, mechanical ventilation will be necessary to provide a viable alternative to ventilation with the windows closed.

I do not therefore consider that the noise assessment fully addresses the concerns but it is recognised that this is an outline application and as such the matter can be dealt with by condition.

With the above concerns in mind I have no objection in principle subject to the conditions below being applied should permission be granted.

Conditions

- Prior to the commencement of development full details of the Foul drainage system shall be submitted in writing to the local planning authority for approval. The agreed plan shall be installed and maintained in that form thereafter unless otherwise agreed in writing with the local planning Authority
- Noisy Demolition and Construction works shall only be carried out during the following times:
Weekdays: 08:00 to 18:00
Saturdays: 08:00 to 13:00
Sundays and Public Holidays: None
- Prior to the commencement of development a Construction Method Statement shall be submitted in writing to the local planning authority for approval. The CMS shall include mitigation of dust and noise including proposed working hours.
- The reserved matters application(s) relating to design and layout of residential dwellings shall include a detailed acoustic assessment and mitigation report (as guided by the document ProPG – Planning & Noise: new residential development) , produced by a competent person, which provides details of the noise exposure at the facade of residential dwellings, internal noise levels in habitable rooms and noise

levels in all associated amenity spaces. The design and layout should avoid exposure (As far as practical) of habitable rooms to noise levels that exceed the following criteria:

- 60dBLAeq 16 hours (daytime, 07:00-23:00, outside)
- 55dBLAeq 8 hours (night, 23:00-07:00, outside)

As required to meet the above, acoustic barriers and site design, including building orientation and internal layout of dwellings, shall be used to minimise noise exposure to habitable rooms and reduce the need to rely on closed windows. Where the facade noise levels outside of habitable rooms do not exceed those stated above, but the internal noise levels stated in the current version of BS8233 are exceeded with windows open, enhanced passive ventilation with appropriate sound insulating properties shall be provided to ensure compliance with the current version of BS8233 with windows closed and that maximum internal noise levels at night do not exceed 45dBA on more than 10 occasions a night.

If exposure exceeds the noise levels stated above, mechanical ventilation (or equivalent that provides satisfactory ventilation) will be required.

The proposed mitigation, including any reliance upon building envelope insulation with closed windows shall be justified in the supporting Acoustic Design Statement that cross reference the mitigation measures used and the evaluation of different designs, layouts and sound reduction methods (including barriers) considered during the design process.

In addition, noise levels in external amenity spaces should not exceed 55dBLAeq 16 hours, daytime. The development shall thereafter be carried out in accordance with any details approved, and shall be retained in accordance with these details.

Chris Cornish MCIEH
Senior Environmental Protection Officer
Babergh and Mid Suffolk District Council - Working Together
Tel: 01449 724599
Email: chris.cornish@baberghmidsuffolk.gov.uk
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Historic England

Mr John Pateman-Gee
Babergh Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Direct Dial: 01223 582721

Our ref: P00966334

13 September 2018

Dear Mr Pateman-Gee

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

**FORMER POULTRY PROCESSING PLANT, HAUGHLEY PARK, HAUGHLEY,
STOWMARKET IP14 3JY
Application No. DC/18/03592**

Thank you for your letter of 5 September 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This application proposes the development of 149 houses on a site until recently used as a poultry factory near the grade I listed Haughley Park. If an alternative site for the proposed new building cannot be found we would not object to redevelopment of the site in principle but consider it important that the setting of the listed building is preserved and enhanced through creation of sufficient landscaping. As the application stands we would recommend this aspect is given further consideration and the application amended.

Historic England Advice

The grade I listed Haugley Park was built around 1620-1630 by Sir John Sulyard in a park with earlier origins. The house is a grand red brick structure with an imposing E-plan approach frontage in the characteristic style of the period with a high-quality of architectural detailing. The house is attached to garden walling and was extended in the 19th century with a large service and stable range. Despite a destructive fire in the 1960s the house contains a number of original interior features adding to its



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 interest. It remains a fine example of the architecture of the period and is listed at grade I. To the south of the house is a large walled garden and to the south east a red brick barn and stables built in the late 16th century and extended in the 17th. These buildings are set within a landscaped park which is the result of multiple phases of historic development.

The poultry factory occupies a large site to the south of the walled garden. This is partly contained within shelter belts of trees at the southern end of the park and bounded by the A14 road which now borders the southern edge of the park. At the north eastern corner and eastern side of the factory site the modern industrial buildings are more clearly seen in the immediate vicinity of the house and barn despite some planting around the factory.

The redevelopment of the factory site has been under discussion for a number of years and Historic England has been consulted on the proposed housing scheme. However, we understand that an alternative scheme has been under discussion with the Council for clearance of the factory site and development of land at the edge of the park on Warren Lane. We have not seen details of this scheme but the alternative site has the potential to have less visual impact on the immediate setting of the listed buildings and core of the historic park providing the factory site was to be returned to parkland. We would therefore very much encourage further development of this alternative proposal, but as this has not come forward have assessed the current scheme in terms of its impact on the heritage assets.

In our pre-application advice we accepted that as part of the park has already been developed as a factory it could in principle be suitable for replacement building. However, we consider it important that new building does not have any greater impact on the setting of the listed buildings and park than the existing. The change of use to residential on such a large scale is likely to generate more traffic than the factory and this could have a negative impact on the experience of the western side of the listed house. If this site is to be redeveloped for any use the opportunity should be taken to enhance the setting of these heritage assets by mitigating the effect of new development.

To this end the applicant suggested enhancing the belts of trees to the north and west of the factory site to screen new development from the park. This is a positive aspect of the current proposals, but we also advised that the east and north east sides of the site closest to the house and walled garden and to an open area to the south of the barn were most sensitive and that significant areas of planting should be provided here. The application as submitted shows some improvement at the northern side of the site where the new development would be accessed but there is little change on the eastern side. We remain concerned that the depth of landscaping is not sufficient at either point to fully separate the new development from the historic landscape beyond which could result in a harmful impact on the listed buildings. Not only should a deeper belt of landscaping with trees and understory planting be provided but amenity space for the new development should be set behind it so the new properties face across it towards the landscaping and do not command views



out into the historic landscape. To create sufficient depth and landscaping it might be necessary to reduce the housing on these sides of the site.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1. In this case we would stress that the house is listed at grade I and so falls within the top 1% of listed buildings nationally.

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8). The significance of listed buildings can be harmed or lost by development in their setting. The NPPF states that clear and convincing justification should be made for any such harm and that 'great weight' should be given to the conservation of listed buildings irrespective of the level of harm caused (paragraphs 193 and 194). This weight and the justification for harm should be especially convincing where harm to buildings of a high grade of listing is concerned. Paragraph 200 also states that the Council should favour those proposals for development which preserve those elements of setting that make a positive contribution to the heritage asset of better reveal its significance.

The Practice Guide to the NPPF establishes that the setting of a listed building is the surroundings in which it is 'experienced' and that 'the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.' Moreover, the guide states that '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 ... our understanding of the historic relationship between places.'

We have considered this application in terms of this policy and are concerned that development of the application site would result in harm to significance of the listed Haughley Park house and its associated barn and not preserve those elements of setting that make a positive contribution to the heritage asset and better reveal its significance in terms of the NPPF, paragraphs 193 and 200. As such it would not achieve the NPPF's overarching aim of promoting sustainable development. We would recommend the Council give further consideration to the possible alternative scheme which could deliver development on a site further from the listed house and so allow a greater enhancement to its setting by returning the current application site to parkland. If the Council are minded to support the current application paragraph 196 requires the Council to consider any public benefit which might be delivered by the proposals and weigh this against the harmful impact. However, we consider that substantial amendment of the landscaping scheme including the reduction in the number of houses as described above could reduce the impact of the new building and strongly recommend this is sought.



Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 7, 8, 193, 194, 196 and 200 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity. Please contact me if we can be of further assistance.

Yours sincerely

David Eve
Inspector of Historic Buildings and Areas
e-mail: david.eve@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.



Consultation Response Pro forma

1	Application Number	DC/18/03592 Haughley Park	
2	Date of Response	11.10.18	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> no harm to a designated heritage asset because it can be considered an enhancement over the present situation. The Heritage Team raises no objection and recommends that further mitigation be sought of the impact of development on the setting of the listed house. 	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Heritage have been involved in pre-application discussions on the scheme and have expressed general support subject to certain amendments, clarifications and further details.</p> <p>Haughley Park is a house of great architectural quality built in the 1620s and listed at grade I despite serious damage by fire in the 1960s. It stands in a landscaped park with various ancillary buildings to the south including a listed barn. Beyond these is a large industrial site, now redundant, comprising an extensive factory building of overtly modern appearance along with various ancillary structures.</p> <p>In NPPF terms we consider that the existing building represents a considerable compromise to the role that the house's setting plays in its significance. If the site is to be redeveloped the opportunity should be taken to enhance the house's setting by reducing or mitigating the impact of the site. We would draw attention to the NPPF's definition of 'conservation' as including 'enhancement where appropriate'.</p> <p>Our pre-application advice focussed on four aspects of the proposal:</p> <p>The illustrative masterplan includes a green buffer which would visually detach the site from the</p>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

	<p>immediate setting of the house, and would soften its impact in visual terms. At the north side where the site comes nearest to the house, the green buffer has been deepened in illustrative scheme. Since layout is one of the matters reserved at this stage, we would ask whether similar improvement can be achieved along the eastern boundary of the site where built development is now proposed closer to the existing buildings.</p> <p>There is scope for resulting traffic movements to be better or worse in impact on the setting of the listed house, compared with the traffic associated with the factory. When assessing expert advice on traffic you should bear this potential impact in mind.</p> <p>We have discussed the layout and design of the 'gateway' of the site – whether and how development at this point should relate to the house. We note that the development is moved further into the site in this scheme, behind a deeper green buffer, but we remain concerned that the long continuous frontages line, despite their varied treatments, would present a rather hard edge to the built part of the site, and would ask for a better transition between the green buffer and the built-up core of the site.</p> <p>We have expressed some concern that extension of the site into previously undeveloped land to the west of the industrial site would represent some erosion of the wider rural setting of the listed house. In the masterplan now submitted the layout includes sports grounds in this area, which better maintains the undeveloped green character of this part of the setting, although we would be concerned about matters such as fencing, lighting and parking.</p> <p>In summary we consider the proposal represents a clear enhancement in heritage terms over the present situation, and recommend consideration be given to the points raised above with a view to further mitigating the impact of the site in the setting of the listed house. As the application is in outline form, we defer to your judgement as to whether these should best be addressed at this stage or as reserved matters.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with</p>

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	changes? Please ensure any requests are proportionate	
7	Recommended conditions	

Please note that this form can be submitted electronically on the Council's website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Council's website and available to view by the public.

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: Amanda.lyes@suffolk.nhs.uk
Telephone Number: 01473 770000

Date: 14 September 2018

Your Ref: DC/18/03592

Our ref: IESCCG/ DC/18/03592/JH

By email: planningyellow@baberghmidsuffolk.gov.uk
Philip Isbell, Corporate Manager – Growth & Sustainable Planning
Mid Suffolk District Council & Babergh District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Dear Sir/Madam,

Proposal: Outlining planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works.

Location: Former Poultry Processing Plan, Haughley Park, Haughley, Stowmarket, IP14 3JH

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicant's 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.

Background

2. The proposal comprises a development of 149 dwellings, which is likely to have an impact on 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 two surgeries within a 5km radius of the proposed development, StowHealth and Combs Ford Surgery. 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 coordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. The Primary healthcare services directly affected by the proposed development and the current capacity position are shown in Table 1.

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

Premises	Weighted List size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Stowhealth	17,901	1000.0	14,583	-227.49
Combs Ford GP Surgery	8,465	378.50	5,520	-201.95
Total	26,366	1378.50	20,103	-429.44

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. A proportion of the required funding therefore for the provision of increased capacity and range of services within the existing healthcare premises, 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 because of this development will be utilized 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 provision 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 the Council.

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

Yours faithfully

Amanda Lyes

Chief Corporate Services Office
Ipswich and East Suffolk Clinical Commissioning Group

From: Nathan Pittam
Sent: 02 October 2018 10:50
To: John Pateman-Gee <John.pateman-Gee@aberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@aberghmidsuffolk.gov.uk>
Subject: DC/18/03592. Land Contamination

Dear John

EP Reference : 247490

DC/18/03592. Land Contamination

**Haughley Park Food, Haughley Park, Access Road to Haughley Park from
Haughley New Street, Haughley, STOWMARKET, Suffolk, IP14 3JY**

**Outline planning permission (all matters reserved) except the access point for
the demolition of existing industrial buildings and construction of 149
dwellings etc (see remarks).**

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development provided that the attached condition is included with any permission that may be granted for the site.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@aberghmidsuffolk.gov.uk

Work: 07769 566988 / 01449 724715

websites: www.abergh.gov.uk www.midsuffolk.gov.uk

From: Iain Farquharson
Sent: 03 October 2018 15:42
To: BMSDC Planning Area Team Yellow <planningyellow@aberghmidsuffolk.gov.uk>
Subject: M3 247293: MSDC Planning Consultation Request - DC/18/03592

Dear Sir/Madam

It is acknowledged that the application is for outline permission but considering the number of dwellings proposed some consideration of this topic area is expected. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability.

As these items have not been addressed the recommendation is refusal, should the planning department consider setting conditions to ensure the development meets its environmental obligations the following is suggested.

Should a condition be deemed appropriate we suggest the following:

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@aberghmidsuffolk.gov.uk

Dear Mr Pateman-Gee

RE: DC/18/03592 - Former Poultry Processing Factory, Haughley Park

Introduction

The Open For Business Team OBJECTS to the application.

History

The estate was purchased in 1956 when the house was under threat of demolition. Planning Permission was given to build an egg packing station as enabling development to fund the restoration and repair of the historic house. The egg packing station over time has evolved into the large factory of the present day.

Policy

The site is not covered by a Local Plan allocation or designation on the proposals map, other than the Special Landscape Designation. However, employment use is well established. As set out in the Council's 2018 Open For Business Strategy¹ the Council's objectives include:

3. Aims and objectives

3.1 This strategy will, in combination with other collaborative approaches, provide a framework to deliver the following aims and objectives:

- a) Support delivery of the Councils' Joint Strategic Priorities, the Suffolk Growth Framework, New Anglia Economic Strategy and the Government's Industrial Strategy*
- b) Protect our employment base***
- c) Help to deliver 10,000 new jobs* and nearly 18,000 new homes** by 2036*
- d) Deliver a range sites of different types, sizes and locations of employment land and premises to meet both identified business sectoral needs as well as general employment sites.*
- e) Safeguard employment land and assets that are able to deliver additional growth beyond these minimum needs***

...

The Local Plan policy also seeks to protect employment land:

POLICY E4

THE DISTRICT PLANNING AUTHORITY WILL REFUSE PROPOSALS FOR DEVELOPMENT ADJACENT TO OR WITHIN EXISTING INDUSTRIAL/BUSINESS AREAS WHICH WOULD BE LIKELY TO PREJUDICE THE CONTINUED USE OF THOSE AREAS FOR PRIMARILY INDUSTRIAL OR COMMERCIAL PURPOSES.

Lichfields' evidence² states a quantitative need for additional employment land across Mid Suffolk of 9.4ha which "*make[s] an allowance for normal market vacancy rates, but do[es] not allow for future replacement of losses or apply a safety margin*". Therefore, the loss of employment land to other uses will fail to deliver the targets sought in the Local Plan evidence.

¹ <https://www.midsuffolk.gov.uk/assets/Economic-Development/OpenForBusiness-Strategy-with-links.pdf>

² <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Ipswich-Economic-Area-Sector-Needs-Assessment-Sept-2017.pdf>

The applicant's Planning Statement sets out that no other employment use is viable, but this is not accepted. Generally speaking, there is a shortage of AVAILABLE land and premises (large allocations remain but are undeliverable). For Town Planning purposes, employment need is stated in hectares/land quantum. However, in reality the SME nature of local businesses is the need for PREMISES, not LAND. These premises could realistically be taken up by another user. However, no marketing is known to have been carried out to promote the same, and no viability calculations have been submitted to demonstrate that an alternative use is not possible.

Pragmatically, it is unlikely that another chicken processing operator will continue the use of the plant, and also unlikely that a single large business would seek to take on the whole site for another use. However, alternative options have not been explored, such as sub-division of the premises, or redevelopment for alternative employment user/uses, which is the next presumption in the Local Plan, as Policy E5 below.

POLICY E5

WITHIN EXISTING INDUSTRIAL AND COMMERCIAL AREAS, FAVOURABLE CONSIDERATION WILL NORMALLY BE GIVEN TO CHANGES OF USE TO, OR NEW BUILDING WITHIN CLASS B1 AS DEFINED BY THE TOWN AND COUNTRY PLANNING (USE CLASSES) ORDER 1987 (AS AMENDED), APPLICATIONS FOR USES FALLING WITHIN GENERAL INDUSTRIAL USE CLASS B2 OF THE SAME ORDER WILL BE CONSIDERED ON THEIR MERITS HAVING REGARD TO ACCESS, TRAFFIC GENERATION, AND ANY ADVERSE IMPACT ON EXISTING INDUSTRIAL OR COMMERCIAL OPERATIONS, ENVIRONMENTAL OR NEARBY RESIDENTIAL AMENITY.

This option is preferred as it reflects the Local employment spatial profile:

- Proximity to Port of Felixstowe and the A14 corridor supports a number of port-related companies occupying employment land in this part of the District.
- Mid Suffolk not characterised as a strong office location, but is well placed for manufacturing, processing and logistics.
- The majority of rural / hinterland employment sites in Mid Suffolk are small, dominated by single use owner-occupiers which have grown organically in the location (such as the subject site) or a re-purposing of redundant (usually fam) buildings into small workshops for SMEs.

Limited development over the years has resulted in very limited "churn" of users in existing premises all across the District. These premises are ageing and do not often meet the needs of modern business, such as through energy inefficiency. Particularly in rural areas, sub-prime premises are in demand through an overall lack of supply, and are needed to ensure there is an employment base across the District's many small communities that reduces the need to travel to Stowmarket or other centres for employment.

Demand for premises can be demonstrated nearby with the recent permission³ for 7,344 sqm of new floorspace (Warehouse and office development) on a greenfield site that was granted on the basis of a lack of available land for employment development. Construction began within weeks of the permission as operators/tenants signed leases immediately.

Accordingly, there is an overall quantified need for additional employment land, and the need to re-task existing PREMISES to alternative users/uses to provide the type of accommodation that allows rural communities to maintain an employment base. The buildings on this site present such an opportunity that should be explored before it is lost to other forms of development. Should that not

³ Application reference DC/18/01279

be possible, the redevelopment of the site with alternative employment offer should also be explored before the loss of the site to another use can be agreed.

Conclusion

Given the above, the Open For Business Team OBJECTS to the proposed development.

From: RM Floods Planning

Sent: 23 August 2018 08:02

To: BMSDC Planning Area Team Yellow <planningyellow@aberghmidsuffolk.gov.uk>; RM Floods Planning <floods.planning@suffolk.gov.uk>

Cc: John Pateman-Gee <John.pateman-Gee@aberghmidsuffolk.gov.uk>

Subject: 2018-08-23 JS reply Former Poultry Processing Plant , Haughley Park, Haughley, Stowmarket IP14 3JY Ref DC/18/03592

Dear John Pateman-Gee,

Subject: Former Poultry Processing Plant , Haughley Park, Haughley, Stowmarket IP14 3JY Ref DC/18/03592

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/03592.

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

- Flood Risk Assessment & Drainage Strategy ref 16058
- Site Location Plan Ref P180128-001-01B
- Illustrative Master Plan P18-0128-004-01E
- Land Contamination Report ref B18025 Rev 0

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. Modelling shall be submitted to demonstrate that the surface water runoff will be restricted to 30.1l/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

Informatics

- 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

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highway & Infrastructure

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

Tel 01473 260411