

Comments from the SnOasis Parish Alliance on the SnOasis Reserved Matters Application No: 4494/16 (SPA)	Applicant Responses	Developers Document Reference	Officer Commentary
Ecology			
<p>Comment 1- The developer still does not have a license for the wildlife mitigation plan despite a decade in which to do so. It is essential that the developers obtain approval for their mitigation plans as soon as possible and obtain an appropriate license from Natural England.</p>	<p>We are very keen to secure the European Protected Species Licence (EPSL) for great crested newts and have had significant discussions with Natural England on several occasions over the last 15 years. However, the process is very clear and until reserved matters approval is given (and relevant conditions discharged) Natural England cannot issue an EPSL. We have very good knowledge of the GCN on site in terms of their numbers and distribution and we have set out an outline mitigation plan. Francesca Shapland of Natural England is happy with our plans at this stage, having said “I can confirm we won’t need any further information on newts at the planning application stag”. In parallel to the resolution of the reserved matters application we are looking to move the licence application forward and have applied to Natural England for meetings and a site visit through their Discretionary Advice Service (we expect a meeting in early May 2018).</p>	<p>N/A</p>	<p>The applicant/developer cannot be granted a licence until planning matters are resolved. There is no reason to suggest that a licence will not be granted.</p> <p>Nevertheless, planning conditions can ensure that no work can take place until such licences have been granted.</p>
<p>Comment 2- The mitigation plan timescales show a 6-month window from</p>	<p>We have carefully considered habitats which are to be lost and those which will be created</p>	<p>N/A</p>	<p>These comments are noted; however, the Council’s ecologist, Suffolk Wildlife</p>

<p>the start of phase 1 to the start of phase 2. This implies that the mitigation areas will be fully in place and stocked with wildlife before operations begin in main quarry. Mitigation involves stripping several metres high nutrient fertilised topsoil from the surface to create a low nutrient chalk grassland with the creation of 46 new ponds suitable to be an alternative to the main construction area. 6 months is wholly unrealistic for this to occur, Natural England and Suffolk Wildlife Trust's estimates to the Public Inquiry were in the region of 57 years for sufficient maturity of the chalk grassland and ponds to mature sufficiently for the wildlife that is to be moved. How is the developer proposing to meet this timetable?</p>	<p>through the SnOasis scheme. We know that much of the newly created habitat will not have fully established in the short term. Any protected species that need to be moved, particularly GCN and badgers will not be reliant on any newly created habitat, as plans account for existing habitats to be utilised and enhanced where necessary. Other notable species, for example aculeates, will have a bespoke habitat created and this needs little time to mature. The same goes for sand martins. Skylark, of which there are a few breeding pairs on site will be able to use newly planted grassland long before it is fully established, since the physical structure of the habitat is important for nest sites. Dormice have been shown to be absent from the site but woodland and hedgerows, being created, will have areas managed to be suitable for dormice in anticipation that they will likely find their way to the site in time.</p>		<p>Trust, and Natural England, raise no objection subject to the imposition of conditions/controls upon the development.</p>
<p>Comment 3- Local people are very concerned to learn that New Zealand Pygmy weed (<i>Crassula</i>), a notifiable plant (Schedule 9 of the UK Wildlife and Countryside Act 1981), is present in the development site that could be spread to surrounding properties through vehicles leaving the site. it is essential that a robust bio security plan is in place before construction commences.</p>	<p><i>Crassula helmsii</i> is widespread across the site, particularly in the damper areas around ponds and in the shallower areas for the ponds. We have already had some discussions with both Natural England and the Environment Agency about a biosecurity plan which will include measures to be put in place to prevent the spread of <i>crassula</i> both around and off the site.</p>	<p>Ecological Mitigation and Management Plan (EMMP). Prepared by Peak Ecology</p>	<p>Planning conditions will require both the EMMP and an additional biosecurity plan/arrangements to be in place. This will apply to construction methodology and traffic also (Construction and Environmental Management Plan). This is standard industry practice.</p>

<p>Comment 4 - It is understood that requests have been made to the Planning Department relating to the Environmental Impact Assessment (EIA) Scoping Report (Ecology Section 5.2) and the request of assistance from the Suffolk Wildlife Trust. It has been requested that an up to date report is made but there are no reports available. As this site is deemed to have a high ecological value the assessment is paramount. When will the reports be available?</p>	<p>Suffolk Wildlife Trust have been engaged as part of post submission discussions, including the review and signoff of the submitted EMMP. This document should be available on Mid Suffolk's webpage and we will liaise with them to ensure everything is there and downloadable.</p>	<p>Ecological Mitigation and Management Plan (EMMP). Prepared by Peak Ecology</p>	<p>The Scoping exercise determined what was required to be included within the submitted ES. Where details have been provided, they have been made available to the public. All significant amendments to the application(s) have resulted in further public consultation.</p>
<p>Site Security and Access</p>			
<p>Comment 1- The plans have little detail on site security and access matters. Two entrances are shown, one on Gt Blakenham and the other at Baylham Stone. The road at Baylham Stone is quite unsuitable for anything other than the lightest traffic, being a single-track C-class road with minimal passing places. It is essential that restrictions be placed on usage of this entrance and all construction and visitor traffic must be prohibited.</p>	<p>The suggested prohibitions are noted and agreed.</p>	<p>N/A</p>	<p>This is capable of being controlled by condition and the applicant's willingness to accept this comment is noted.</p>
<p>Comment 2- If it is intended that this western entrance is to be restricted to emergency purposes only, we do not understand why its location has been moved further away from the B1113, surely the shortest route is the most desirable from everyone's point of view. As a minimum, the developer must pay for improvements to the road surface and the</p>	<p>It is no longer the intention to utilise this route for emergency access and an alternative solution has been put forward. As such it is not considered necessary to provide improvements to this route.</p>	<p>N/A</p>	<p>Emergency access is controlled by condition and which is already part of the outline planning permission. That condition remains to be discharged and does not form a part of the reserved matters applications for approval at this stage.</p>

<p>addition of properly constructed passing places at appropriate intervals.</p>			
<p>Comment 3- The site is to be secured by fencing but it is unclear what type of fencing is to be used. Only the fencing around the mitigation areas is described. While site security is important, the visual appearance in the Special Landscape Area is very important. All such fencing should be screened by appropriate planting of hedges and no permanent security lighting permitted.</p>	<p>A range of different fence types are proposed as shown on the Landscape General Arrangement plans and access strategy in the Landscape Development Scheme, both of which were submitted as part of the RMA. These show that where possible, hedgerow planting and shrub planting is used to screen these security fences. As discussed at our meeting on 5 April, the final detail of fencing will be the subject of an application to discharge this condition and will require approval by Mid Suffolk with input from consultees and stakeholders (including Parish Councils).</p>	<p>Landscape GA Plans; Landscape Development Scheme.</p> <p>Both prepared by Bradley Murphy Design</p>	<p>This is recommended to be treated by planning condition.</p>
<p>Alternative Site Usage</p>			
<p>Comment 1- The analysis of alternatives is flawed. It essentially concludes that that a ski centre is the only viable option for the site and if it is not built, the site will remain brownfield for the foreseeable future. This is simply not correct and does not take account of the changing priorities of the county. Suffolk already has a successful tourism industry but as is typical of this sector, incomes are below national averages. Suffolk needs more, better paid jobs and more housing. Most of the site is not deep quarry, it is levelled, landscaped lakes and grassland making it an attractive site for mixed high-tech</p>	<p>In terms of other uses, it is agreed that other uses (for example housing or business uses) could be acceptable here and may or may not be viable. However, and critically, at this time the SnOasis proposal represents an extant outline planning permission and as a concept remains viable and deliverable.</p>	<p>Environmental Statement.</p> <p>Prepared by Buro Happold</p>	<p>The assessments of alternative site uses is applicable to the EIA process and forms a part of the submitted ES. It is of particular relevance when determining whether to grant planning permission.</p> <p>Planning permission for SnOasis is already in place. In any event, the IAU have considered the explanations provided within the new ES to be satisfactory and officers endorse that view.</p>

<p>businesses and housing. Such an option would be much more in keeping with local economic needs, would be visually much more acceptable to local people and would minimise impacts on resources such as roads.</p>			
<p>Visual Appearance</p>			
<p>Comment 1- The documents state that the buildings are in the “Suffolk and Alpine vernacular” of wooden clad, box-like structures with modern metal roofs. Such a style does not exist anywhere and is out of keeping with the Suffolk landscape. The predominant roofing for Suffolk buildings is tile or thatch, typically red clay pantiles for farm buildings - sectional metal roofs are neither common in Alpine regions or in Suffolk. The drawings of the building neither show architectural flair or attractiveness, being simply cheap box-like industrial buildings clad in timber giving them some nod to a Suffolk or alpine style. The building designs should be rejected in favour of more pleasing structures of genuine architectural merit, in keeping with the style of this part of Suffolk and helping to enhance, not degrade the Special Landscape Area which they abut.</p>	<p>As discussed at our meeting, the final detail of all buildings will be secured as part of application(s) to discharge planning condition(s). This will relate to specific detailing and materials to be used across SnOasis. These applications will be registered by Mid Suffolk and you will have the opportunity (as key stakeholders) to comment on these applications as part of the determination process. We would very much like to work with local residents / parishes to work through this detail and look forward to doing so later in 2018 (subject to a green light in the next few months).</p> <p>We add that the chalet design has been updated following comments. The roofing materials have been changed in favour of timber shingles which will weather graciously and are in keeping with the use of natural materials. Detail present in alpine architecture has been incorporated including cross braced timber balustrading to the terraces which have now been introduced to each chalet. Significant consideration has been given to the choice of materials, composition and detailing to ensure the chalets sit</p>	<p>Design and Access Statement.</p> <p>Prepared by Leslie Jones Architect</p>	<p>The precise nature of external finishes can be treated by planning condition and it is noted that the applicant is willing to take the comments of the SPA into account.</p>

	<p>harmoniously with the wooded surroundings of the Suffolk countryside. This will hopefully act as a good starting point for future discussions as part of the detail to be agreed as part of the approval of material under relevant planning conditions.</p>		
<p>Comment 2- It is recognised that the ski dome does not lend itself to conventional "Suffolk or Alpine vernacular architecture". Nonetheless it is highly uncharacteristic of rural Suffolk and we request that the developer makes all possible efforts to ensure that it is as unobtrusive on the skyline as possible.</p>	<p>These comments (as well as those made at our meeting on 5 April) are well received and noted. The developer will look to deliver an unobtrusive building through materials and detailed design.</p> <p>As set out previously, the detail and materiality will need to be approved as part of a discharge of condition application(s) and Parishes will have the opportunity to input as part of this process. The material choice will need to reflect its form and the use of timber or another natural material characteristic of Suffolk would not be appropriate. The metallic skin has been chosen so that it will reflect the surrounding context whilst being honest to its use and form.</p>	N/A	<p>The precise nature of external finishes can be treated by planning condition and it is noted that the applicant is willing to take the comments of the SPA into account.</p> <p>As set out in the Committee Report, the scale, form and general design of the Ski Dome is considered to be acceptable.</p>
<p>Comment 3- We believe the ski dome should not be purposely lit externally and reflected light should be minimised, as described in our response section covering Lighting.</p>	<p>As discussed on 5 April light spillage (through external lighting or reflection) will be mitigated through design and management to ensure that this is avoided. Details of lighting, including lighting specifications and management plans will be submitted (and require approval) as part of applications to discharge planning conditions in the future. We very much welcome the Parishes' input as part of this process.</p>	N/A	<p>Lighting is to be controlled via condition.</p>

<p>Comment 4- Any aircraft warning lights sited on the dome should be of the minimum intensity allowed by the regulations at 200 calenda, as at the nearby Suez plant.</p>	<p>This is understood and agreed (in principle, subject to agreement by the necessary authorities / bodies). Details of the lighting will be secured through applications made in the future to discharge planning condition(s).</p>	<p>N/A</p>	<p>Lighting is to be controlled via condition. Though the planning system cannot interfere with the requirements set out under other legislation.</p> <p>The scale of the Ski Dome is fixed.</p>
<p>Comment 5- The ski dome should not carry any advertising material or logos. The aim should be to minimise its obtrusiveness on the surrounding landscape.</p>	<p>As discussed at our meeting on 5 April, this is agreed. Any advertisements would be subject to needing Advertisement Consent (which will be in the form of an application to Mid Suffolk). That being said, advertisements in this location will not be required or forthcoming.</p>	<p>N/A</p>	<p>This is noted.</p>
<p>Comment 6- The boundary fences must not be lit in order to prevent disturbance to wildlife.</p>	<p>This is noted and lighting on fences is not considered to be required by developer and will therefore not be proposed / applied for</p>	<p>N/A</p>	<p>This can be treated through landscaping/fencing/lighting/ecological conditions.</p>
<p>Comment 7- The proposals show other buildings rising 20 meters or so above the highest point of the site. We request that the developer makes all possible efforts to ensure that it is as unobtrusive on the skyline as possible. We suggest they should also be non-reflective and designed to blend with the sky as far as possible, rather than stand out.</p>	<p>All building locations and heights are as approved as part of the outline planning permission - this has not or cannot be amended. The details / materiality of all buildings will be the subject of future applications and will need Mid Suffolk approval (with input from key stakeholders, including local residents and parishes).</p>	<p>N/A</p>	<p>The reserved matters applications have been submitted in accordance with the parameters already set by the outline planning permission.</p> <p>External finishes are secured by conditions.</p>
<p>Transport</p>			
<p>Comment 1- The decision to abandon the building of a railway station, as required by the Secretary of State as a pre-requisite to building Snoasis, is most regrettable. Had the developer retained sufficient land in the former cement works site to build a station rather than selling it for housing,</p>	<p>As we discussed at our meeting on 5 April, the loss of the previously proposed railway station at Great Blakenham (whilst disappointing) results from the timetabling targets of Abellio and the need to increase efficiency and reduce travel time from London through to Norwich. This has resulted in there being no</p>	<p>Transport Assessment updates. Note prepared by Motion Transportation.</p>	<p>An alternative solution has been proposed and has been accepted by the Local Highway Authority.</p> <p>Appropriate measures will be secured as part of a new s106 legal agreement.</p>

<p>such a station design could have allowed for through trains not to be impeded and jeopardising Network Rail's plans for speeding up services to London. Why was this allowed to happen?</p>	<p>support from the service provider or network owners for the proposed new station. A station, even if built, could not be served by trains. An alternative has been offered, a dedicated shuttle bus running between Stowmarket and SnOasis and details are provided in material submitted in the last few months.</p>		
<p>Comment 2- Loss of this amenity is very significant for local people; in fact it was the only positive aspect of the entire scheme for many of them. Simply substituting a bus service from Stowmarket station is an unacceptable alternative to this environmentally positive asset that was designed to reduce, not increase traffic congestion in the surrounding area. Why is the proposed bus service not from Ipswich ? This would give greater reach on the rail network) and would also bring a positive and lasting benefit to the local community.</p>	<p>Updated traffic survey work was undertaken as part of the process of updating the application documents which was used to inform the identification of an alternative solution to the railway station. Through these discussions and based on the survey work, the most sustainable alternative solution was identified as encouraging visitors to travel to Stowmarket Station from which a shuttle bus service to SnOasis will operate.</p>	<p>Transport Assessment updates. Note prepared by Motion Transportation.</p>	<p>As above.</p>
<p>Comment 3- Since the Secretary of State made his determination in 2008, that a railway station was an essential pre-requisite, the traffic situation has further deteriorated. Over 2000 new houses are either built or approved in a five-mile radius of the site, a major energy from waste plant has opened adjacent to the site and traffic on the A14 increased considerably.</p>	<p>On the basis that the railway station cannot be delivered a shuttle bus to and from Stowmarket Station is now proposed and is considered to be acceptable</p>	<p>N/A</p>	<p>As above.</p>

<p>Comment 4- If a station is indeed now not feasible given the small land area in which to build it, the investment that would have taken place to build it must be transferred into additional road improvements over and above this required in Section 106 agreements that have not been rescinded by MSDC. Chief among these must be: Improvements to the A14 at junctions 52 (Claydon) and 55 (Copdock) to provide dedicated slip lanes that avoid queuing at the roundabouts. It would be helpful if we could understand the logic and decisions that were made not to listen to the Parish Councils that the north bound dual carriage way leading to the A14 is still left lane for left turn and all other routes in the right hand lane. This is compounded by the reluctance to let traffic turn right at the light controlled junction towards Bramford and Sproughton. Improvements to the B1113, roundabouts at both the entrance to Snoasis and the junction with the dual carriageway leading to the A14 Consideration to the 6 junctions that will sit within a few hundred yards or each other with 4 that are almost solely used by HGV's and the impact on traffic flow along the only route from Needham Market and the southern villages along the valley. Passing places and surface improvements to the unnamed single track road at</p>	<p>A series of highways improvements works are proposed as part of the SnOasis scheme (secured through the outline and revisited as part of the reserved matters). As part of future and continued engagement with the SPA, we would like the opportunity for Motion (transport consultants) to present on all transportation matters. This may be best suited to a 'public update meeting' to be held in Great Blakenham later in the summer (discussed at our meeting on 5 April)?</p>	<p>Transport Assessment updates. Note prepared by Motion Transportation.</p>	<p>A developer cannot buy a planning permission or decision; obligations must be necessary, reasonable and directly relevant.</p> <p>A new s106 agreement, with updated obligations is proposed to be entered into. The relevant Heads of Terms recommended to Members is found at Appendix C to the Committee Report, where the County Council as LHA have set out the required mitigation.</p>
--	--	--	--

<p>Baylham that are proposed to carry emergency vehicles access to Snoasis. Why have changes to Hackneys Corner traffic priorities not been considered despite being in the original plans to alleviate an accident hot spot at the junction with Stowmarket Road?</p>			
<p>Comment 5- Does MSDC Planning Dept. actually consider the impact of further developments when looking at the road network impact analysis for SnOasis? Developments in and along the B1113 to Needham Market (quarry housing, industrial estate and Stowmarket Road development) all contribute heavily to the additional loading of the roads.</p>	<p>As discussed, yes, this is part of the Environmental Statement and the Cumulatives Assessment, which takes account of committed development (those with planning permissions granted since the outline was approved).</p>	<p>Transport Assessment updates. Note prepared by Motion Transportation.</p>	<p>Updated traffic assessments were included as a part of the ES. Planning officers rely upon the expert advice of the LHA as the statutory consultee in highway matters. They raise no objection and officers accept that position.</p>
<p>Comment 6- SnOasis cannot be economically justified within the immediate local catchment area, and for it to be financially viable, it must inevitably seek custom from a much wider geographical area. There are serious questions over the ability of the local road infrastructure to cope with the increased traffic and the and it will place a heavy burden on the whole infrastructure. Why has MSDC not insisted on the developer funding improvements to the road network?</p>	<p>The principle and concept of SnOasis is already established and this being through extensive review and consideration. The existing Section 106 legal agreement secures highways works which are related to the development. In addition to this investment, the shuttle bus (replacing the railway station) represents a significant further investment relating to visitor trips to SnOasis.</p>	<p>N/A</p>	<p>SnOasis already has planning permission. Viability was a matter put before the planning Inspector and Secretary of State in deciding to approve the development.</p>
<p>Planning Enforcement</p>			
<p>Comment 1- MSDC are responsible for enforcing the various conditions and Section 106 agreements on the developer.</p>	<p>This is noted and the developer assures the SPA that as part of the planning application process (fees paid) and legal obligations,</p>	<p>N/A</p>	<p>The Council has a statutory duty to deal with enforcement matters.</p>

<p>A huge half billion pound development will require a major increase in planning enforcement resources over several years if this is to be meaningful and the developer take them seriously. Onslow Suffolk have a poor track record in this regard over a number of years for example allowing the destruction of wildlife, failure to maintain the site etc. The SPA seeks an assurance that MSDC has planned for adequate budget to appoint a suitably skilled and empowered enforcement team for the duration of the development and beyond.</p>	<p>substantial funds and resources are secured for MSDC's use.</p>		
<p>Financial Bond</p>			
<p>Comment 1- We would like to see the Council imposing a significant bond on the developer to deal with the consequences of business failure of Snoasis. While economics are not a factor in planning decisions, sustainability certainly is. By any measure, SnOasis is a high risk development, being the first of its kind anywhere in the world and with a design of a huge main attraction that has virtually no conceivable alternative uses.</p>	<p>The Applicant takes seriously its commitment to deliver SnOasis – both initially and as part of its ongoing operation.</p>	<p>N/A</p>	<p>This was considered by the planning Inspector and Secretary of State in determining to grant planning permission.</p> <p>The inclusion of a Decommissioning Plan was accepted as an appropriate obligation within the s106 agreement. It will remain within the new s106 agreement.</p>
<p>Site Illumination</p>			
<p>Comment 1- With reference to 035438 RESERVED MATTERS APPLICATION Artificial Lighting Strategy Report We agree with the above report (para 2.1) that the site and local area should be classified as E1. That is: an “intrinsically</p>	<p>Further detail - including lighting specifications and management plans - will be secured through discharge of condition material (requiring approval by MSDC). This will be subject to SPA input as part of the</p>	<p>N/A</p>	<p>This will be treated by condition.</p>

<p>dark” natural environment. This emphasises the importance of maintaining minimal direct light from the site and minimising ‘glow’ from above. This view is evidenced by the Campaign for the Protection of Rural England’s 2016 research (“England's light pollution and dark skies”) showing Mid-Suffolk as the 26th “darkest sky” District of 326 in England</p>	<p>consultation process. These comments are welcomed as part of that initial design process</p>		
<p>Comment 2- The Institute of Lighting Professionals’ Guidance Notes for Reduction of Obtrusive Light (GN01:2011) outlines the factors to consider in trying to achieve this. This guidance is not mandatory but is considered best practice in the industry. In considering sky glow, however, it refers only to Direct Upward Light from luminaires and ignores the effect of Upward Reflected light from surfaces. The latter is clearly dependent on weather conditions, humidity etc.</p>	<p>Further detail will be provided in future submissions (as described above)</p>	<p>N/A</p>	<p>This is noted.</p>
<p>We believe attention to a number of design details in the Artificial Lighting Strategy Report would improve the Reflected Light situation:</p>			
<p>Comment 3- 1. The Bobsleigh Run. Figures 4-4 to 4-6 show lighting angled to illuminate horizontally rather than downwards. This is evidenced by the extent of light shown reflected from the ski dome. We suggest the lighting should be angled downward to reduce this</p>	<p>Further detail will be provided in future submissions (as described above). We have taken on board these comments and they will be fed back and used in future(lightning) design development.</p>	<p>N/A</p>	<p>This is noted. Lighting is to be treated by condition.</p>

<p>reflection. Since this is an external feature we suggest light levels be kept to a minimum compatible with safe use of the facility. Standard BS EN 12193:2007 Table A.28 recommends different lighting levels according to the use of the facility:</p> <p>Lighting Class I: Top level competition such as international and national competition which will generally involve large spectator capacities with long potential viewing distances. Top level training can also be included in this class. 300 Lux</p> <p>Lighting Class II: Mid-level competition such as regional or local club competition which generally involve medium size spectator capacities with medium viewing distances. High level training can also be included in this class. 200 Lux</p> <p>Lighting Class III: Low level competition such as local or small club competition which generally do not involve spectators. General training, physical education (school sports) and recreational activities will also come into this category. 50 Lux</p> <p>We presume that the Snoasis facility is class III, given the lack of spectator provision. Hence we seek assurance that the run is not being over illuminated for its planned use.</p>			
<p>Comment 4- The Ice rink (Figure 4-28). It is unclear what material is intended for the roof. Should it be translucent it will contribute significantly to sky glow. We</p>	<p>Further detail will be provided in future submissions (as described above). We have taken on board these comments and they will</p>	<p>N/A</p>	<p>This is noted. External finishes are to be secured by condition.</p>

therefore suggest it should be completely opaque to remove any light leakage.	be fed back and used in future(lighting) design development.		
Comment 5- Tiered car-parking (Figures 4-32 and 4-33) is shown to the south of the ski slope/dome with all luminaires on 6m high columns. We suggest that lower columns will be adequate on the higher tiers, since spill light onto lower tiers will be unnecessary.	Further detail will be provided in future submissions (as described above). We have taken on board these comments and they will be fed back and used in future(lighting) design development.	N/A	This is noted. Lighting arrangements are treated by condition.
Comment 6- Ski Dome (Figures 4-8 and 4-9). This is in effect a light tube – being brightly lit inside and with snow and white-painted walls. If the upper end-face is transparent, as appears to be the case, reflected light as well as direct light will issue out to the surrounding atmosphere yielding significant scope for glow. We suggest that motorised brise-soleils be installed across the end face. These will allow control of heat gain by day, and should be engineered to completely block out the end glass wall at night to avoid any light spill into the surrounding atmosphere.	Further detail will be provided in future submissions (as described above). We have taken on board these comments and they will be fed back and used in future(lighting) design development.	N/A	There are a number of potential design solutions that will ensure light-spill is appropriately controlled. This can be secured by condition.
Comment 7- Maintenance factor. The performance of luminaires degrades over time reducing light levels and so to achieve desired light levels throughout the life of the facility, the initial values must be correspondingly increased. The proportional reduction (the maintenance factor) is dependent on a number of variables, however the report does not	Further detail will be provided in future submissions (as described above). We have taken on board these comments and they will be fed back and used in future(lighting) design development.	N/A	Management/operational/maintenance details would be included in the lighting details reserved by condition. This is typical of large-scale developments.

indicate what maintenance factor has been used in this case. We suggest this be clearly stated and justified to avoid unnecessary 'over-lighting'.			
Comment 8- Overall site lighting must be reduced at the time the site facilities are closed.	This is agreed and we would support MSDC's control through planning condition(s)	N/A	Noted. As above.
Comment 9- What will the definition of "intrusive lighting" be?	Further detail will be provided in future submissions (as described above). We have taken on board these comments and they will be fed back and used in future(lightning) design development.	N/A	Noted. As above. Lighting will need to take into account ecological as well as amenity/dark sky considerations.
Disturbance			
Comment 1- The proposal for set closing times for the site facilities is welcome. We support this but would welcome details of MSDC's enforcement plans for this.	Planning conditions will control opening hours and the developer would support this from an operation point of view. Further detail will be presented by MSDC as part of draft conditions to be concluded within their report to be presented to Planning Committee in the near future.	N/A	Operating hours have already been set by condition under the outline planning permission. If people report a breach of those controls, they will be investigated.
Comment 2- What proposals are there for noise mitigation for the site - during construction work, during normal operations and during special events e.g. concerts?	The impact of the development on the amenity of local communities was considered as part of the Outline planning application and deemed to be acceptable. The Environmental Statement considers this and concludes that SnOasis is predicted to have an 'indiscernible impact' in this regard - the result of the nature of the proposals and core design principles. An outline Construction Management Plan has been submitted as part of the Reserved Matters application. This lays the foundations of how construction will be managed to ensure that it results in minimal disturbance	N/A	Noise conditions have already been applied to the outline planning permission. Construction related impacts/effects are treated within the ES and will be controlled by condition, which is typical for large-scale developments.

	and impact on local communities. It is anticipated that there will be a planning condition requiring for a detailed Construction Management Plan to be submitted and approved by MSDC (this will need to be approved formally and SPA will be able to input and comment on this application)		
Footpaths			
Comment 1- The Community Woodland is a welcome addition as are the permissive paths. It would be helpful to clarify the duration of any agreement. We would expect it to be for the lifetime of the Snoasis Resort. Whilst accepting that the landowner would have the right to close the paths if necessary, this should be kept to an absolute minimum and full public access maintained. However, our preference would be for full public rights of way to be established.	Yes - this will be secured for the lifetime of SnOasis.	N/A	The community woodland is part of the s106 legal agreement. It will remain so. The s106 agreement also includes monies to be paid to MSDC to fund a countryside warden. This obligation will also remain.
Comment 2- One of the permissive paths provides an entrance into the Community Woodland from arable land to south. This is welcomed since it has the potential to link the permissive paths to the local public rights of way network via a connection to FP4 Nettlestead. Care must be taken to ensure that the Snoasis resort land directly abuts the route of Footpath 4 and can therefore connect without leaving a gap. Should there be a gap, it will need to be bridged by an agreement with the neighbouring landowner.	This is noted and direct access will be provided.	N/A	This is noted. SCC are seeking monies in relation to PROW as a part of the new s106 agreement.

<p>Comment 3- Whilst the proposed entrances are appropriate and connect well to the community at Baylham Stone and the existing public rights of way network to the south and west, it would be helpful to have an additional entrance further to the east along the northern side of the site. This would provide enhanced connectivity to the bridleway running to Great Blakenham, involving less road walking. It should be remembered that connecting paths between Nettlestead/ Little Blakenham and Great Blakenham/Baylham were extinguished prior to the site being used for quarrying. Restoration of that lost connectivity should be considered a priority.</p>	<p>Whilst this may not be achievable it is noted and this will be looked at further as part of the design development stage, which will follow following the approval of reserved matters. As with other points raised, we would welcome the input of local representatives (including parishes) to the look and feel of these routes</p>	<p>N/A</p>	<p>This is noted.</p> <p>SCC are seeking monies in relation to PROW as a part of the new s106 agreement.</p> <p>The willingness of parties to engage on future connectivity opportunities is welcome.</p>
<p>Comment 4- Surfacing of the paths should strike a balance between reflecting the natural habitat of native woodland with the provision of a well-drained and even surface. Exits onto the highway should provide suitable barriers to prevent off-road motorcycles from using the paths.</p>	<p>Noted and this will be looked at as further design details are developed.</p>	<p>N/A</p>	<p>Further details for hard landscaping treatments is to be secured by condition.</p>
<p>Comment 5- Why is there no mention of the Section 106 footpath around the site perimeter</p>	<p>This is secured as part of the S106 which is still in place and will therefore still be delivered.</p>	<p>N/A</p>	<p>This to remain in force. SCC are seeking monies in relation to PROW as a part of the new s106 agreement.</p>
<p>Comment 6- There is a footpath going through the mitigation area. Why has no mention been made of diverting this to prevent disturbance to wildlife.</p>	<p>Proposals for the footpath were developed in consultation with ecological consultants to ensure that there would be no adverse impact on any of the ecological mitigation areas.</p>	<p>N/A</p>	<p>No ecological objections have been raised by consultees.</p>

			SCC are seeking monies in relation to PROW improvements and routing as a part of the new s106 agreement.
Piling			
Comment 1- Residents of Baylham in the immediate vicinity of the site are very concerned about the noise and disruption caused by vibration piling. There is at least one Grade 2 listed farmhouse only a few hundred metres from the site and many more old buildings with minimal foundations that may be badly impacted by this. Why is such an unacceptable technique proposed when suitable silent and vibration-free techniques exist. (e.g. screw piling)?	The built form of the SnOasis development will be located a considerable distance from the residential properties to the north of the site. Following the approval of the Reserved Matters application, a contractor will formally be brought on board and at this stage a number of factors including piling, will be developed further as part of material prepared – in conjunction with industry professionals. These details will be submitted to and approved by MSDC and will be the subject of public consultation.	N/A	The applicant has accepted that a condition can ensure that piling and/other penetrative measures cannot be used without demonstrating that no adverse impacts would occur.
Sewage			
Comment 1- The developer is proposing to deal with all the sewage from the site by pumping it into the main sewer for the Cliff Quay catchment. This sewer is already at full capacity and there are no proposals in place for improvements to it. Proposals to improve the sewer should be drawn up and then be sent to the relevant authority for approval. These should be put in place before the site opens.	Condition 13 of the Outline planning permission requires for a wastewater strategy to be submitted to and approved by MDSC prior to the commencement of development. A Drainage Report was submitted in support of the RMA which sets out the outline strategy for all drainage on site. Discussions with Anglia Water informed the preparation of the Drainage Report including aspects relating to wastewater and sewerage. The Anglian Water Pre-Planning Assessment report states that Ipswich Cliff Quay Raeburn Street Water Recycling Centre does have capacity to treat the foul flows. However, it also states that the sewage network does not have capacity for	Drainage Report. Prepared by Buro Happold. Additional material under development.	This remains a condition on the outline planning permission to be dealt with.

	<p>the foul flows. Therefore, to address the lack of capacity in the network, Anglian Water provided a Drainage Impact Assessment report, which recommended 284m³ of storage to mitigate this increase in flow. This proposal is has been included within the proposed Drainage Strategy</p>		
Surface/ storm water			
<p>Comment 1- The proposals for this lack clarity and detail. The site is divided into five areas and it states that Area1 will go to local discharge but does not state exactly where the surface water discharge point is planned to be. The flow rate is assumed to be 4.6 litres per second per hectare. The area is unknown, so it is impossible to calculate the flow rate going to this point. However, it is clear that this is a very large amount of water to be discharged during spells of heavy rain. More details must be given.</p>	<p>Condition 14 of the Outline planning permission requires for a details of surface water drainage to be submitted to and approved by MSDC before any development on site can commence. The Drainage report submitted in support of the RMA includes proposals for surface water drainage. In the event that the Drainage Report is approved, details of the surface water drainage strategy will be submitted to MSDC for approval in line with Condition 14 of the Outline planning permission.</p> <p>Catchment 1 is being retained as green space/parkland and therefore the existing greenfield drainage regime and run off rates are proposed to remain unchanged. Surface water will continue to flow overland through the catchment, with flows controlled at greenfield rates by the proposed parkland planting and green space. There is no increase in hard standing within this catchment and will be no changes to the surface water regime in this area. Further details can be provided, prior to the</p>	<p>Drainage Report.</p> <p>Prepared by Buro Happold.</p> <p>Additional material under development.</p>	<p>Surface water drainage matters are considered within the report as they form part of Phase 2. Planning conditions will ensure the development is constructed and operates in accordance with local and national policy.</p>

	commencement of works on site, once the detailed design has been completed.		
Comment 2- The developer proposes to relocate 80% of the material excavated during construction on the site itself, but gives no further details. This could have an impact on surface water drainage and the developer should be required to give further information this.	The final drainage detail is still to be confirmed, but it is the developer's intention to incorporate excavated materials as part of the wider landscaping on site. This will be controlled as part of the determination of the reserved matters or later by planning condition.	Drainage Report. Prepared by Buro Happold. Additional material under development.	As above.
Comment 3- The developer states that some of it will go into soakaways, but has not clearly specified the amount that will be sent into soakaways (which are known to fail). The developer has not demonstrated that the soakaways would be able to cope at the maximum expected flow rate to be discharged. The main ditch for discharge of surface water from the site runs down to Little Blakenham. This ditch has a number of limited flow points and too much water being sent into it from the site presents a threat of flooding to properties in the Beeches and also a risk to residents. There should be a condition attached to any agreement that, if the soakaways are overwhelmed, there will be no pumping of water out of the soakaways into local ditches.	No volumes for drainage in to the soakaways have been provided within the Drainage Report, however an initial calculation of the areas and depths of the soakaways gives a total volume of storage within the two proposed soakaways of 11,600m ³ . The soakaways will be designed and constructed to the specialists 'best practice'.	Drainage Report. Prepared by Buro Happold. Additional material under development.	As above.
Ground Water			
Comment 1- The soakaways could present a risk of contamination to local boreholes which supply a number of private houses	The process of discharging surface water to ground would only represent a risk to existing aquifers/boreholes if there is ground	N/A	As above.

<p>in the area of the site. There is also a risk of contamination from the base of the ski slope being located ten metres underground. This is a concern that the developer has not addressed and should be raised by MSDC as a part of their duty of care to local residents.</p>	<p>contaminants in existence that could be mobilised by the surface water flows. We are not aware of ground contamination. This can, and will, be further demonstrated by a detailed site investigation prior to the commencement of works on site. It is important to note that discharge of surface water to ground is the preferred method of discharge by the Local Planning Authority and the Environment Agency.</p>		<p>No technical objections have been received in this respect. As per the 'piling' comment above, penetrative foundation design methods would not be permitted unless it can be demonstrated that there would be no risk to groundwater.</p>
<p>Comment 2- The soakaways and the location of the base of the ski slope also present a risk of contamination to the Anglian Water pumping station at Baylham. The proposal mentions improvements to the pumping station. These should be clarified and assessed by Anglian Water before any approval and must be in place before the site opens.</p>	<p>We do not understand how our proposals to discharge to ground, which accords with the recommended sustainable drainage hierarchy, compromises the Anglian Water foul water pumping station at Baylham. Certainly, Anglian Water has not highlighted this as a risk. BuroHappold has not made any reference to the existing Baylham pumping station. We have also provided no pumping within the surface water system and it is entirely a gravity system. The surface water drainage system includes appropriate pollution control measures, including oil interceptors. We believe there is confusion with the foul system. A new pumping station, within the foul water drainage system, has been included to "lift" foul flows to the existing AW network. AW is aware of this.</p>	<p>N/A</p>	<p>As above.</p>

Sustainability			
<p>Comment 1- The development does not appear to meet any of the tests for sustainable development outlined in the National Planning Policy framework. The draft NPPF defines sustainable development as: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future." How does MSDC demonstrate that the SnOasis development achieves the standards given in this definition?</p>	<p>The Applicant takes seriously its commitment to sustainability. Even though the National Planning Policy Framework (NPPF) had not been introduced at the time that the Outline planning application was determined, and the principle of the development was approved, fundamental principles of sustainability underpinned the scheme and these are intrinsic to the ongoing scheme design. It is considered that SnOasis performs well against the principles of sustainability enshrined in the NPPF. The NPPF makes clear that there are three elements to sustainability – economic, social and environmental. A very high 75% of energy will be from renewables.</p>	<p>N/A</p>	<p>The 'Brundtland' definition of sustainability (the first half of the cited quotation which actually originates from 1987) is referenced in the published NPPF as the high-level definition of sustainability and paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>For the purposes of national land-use planning policy, paragraph 8 defines this as meaning that there are three overarching objectives which are interdependent and need to be pursued in mutually supportive ways: economic, social, and environmental. The NPPF goes on to state, however, that they are not criteria against which every decision can or should be judged (para. 9).</p> <p>SnOasis already benefits from planning permission and 'sustainability' which clearly has many facets – including economic drivers – was a matter for the Inspector and Secretary of State to consider.</p> <p>The reserved matters submissions have been assessed against local and</p>

			<p>national planning policy and are considered to be acceptable.</p> <p>'Sustainability' within the context of energy efficiency was a matter dealt with by the SoS and forms part of the s106 legal agreement. This shall remain the case.</p>
<p>Comment 2- There will be a huge impact, on both the parishes closest to the site, but also on a much wider area in the Gipping Valley and around Ipswich. The site will generate enormous amounts of extra traffic, cause loss of a significant natural habitat and also put extra pressure on already overstretched local resources and infrastructure. We request that further consideration is given to the sustainability of the project and the environmental degradation that it will cause for local people and that the developer is required to review their proposals and introduce more measures to improve sustainability</p>	<p>As part of the original planning application and the reserved matters, detailed EIA work has been undertaken and the scheme is considered acceptable in terms of sustainability.</p>	N/A	<p>As above.</p> <p>SnOasis already has planning permission; its uses and nature cannot be altered.</p> <p>Conditions and obligations will remain in place to ensure that the environmental objective of sustainability is satisfied within the parameters already set.</p>
<p>Comment 3- The original reports for the project were produced over ten years ago. For example, the estimates of traffic movements made ten years ago, and made with the benefit of a percentage of customers arriving by rail, are now out of date and increasingly irrelevant as the</p>	<p>Where required all assessments and reports have been updated as part of this application. This includes the cumulative assessment.</p>	N/A	<p>This was the purpose of requiring a new ES to support the reserved matters, which has been independently peer-reviewed by leading EIA practitioners at the Impact Assessment Unit, Oxford Brookes University.</p>

<p>Great Blakenham railway station application is no longer linked to SnOasis Reserved Matters. We seek confirmation that all the reports and surveys have been updated and that the proposals are based on recent data.</p>			<p>It remains the case that the development is permitted.</p>
<p>Comment 4- Consideration should be given to the changes in the local population over the last ten years. Are the needs of the public of Suffolk the same as they were ten years ago?</p>	<p>The developer is comfortable that there is still appetite for the development</p>	<p>N/A</p>	<p>That the developer is still progressing the applications – at considerable cost – indicates that there is a belief that there is an appetite for development.</p> <p>If there is not, the development will not occur/receive finance.</p> <p>Sport England support the development and consider that it would meet an unmet demand.</p>
<p>Comment 5- Sustainability should also include an aspect of environmental gain, and to a certain extent the SnOasis development would do this, from a brown field site to a built environment of leisure activities and holiday accommodation. However, there is considerable loss of natural habitats which the current proposals do not adequately mitigate. What plans to MSDC have to ensure that the developer delivers an adequate mitigation strategy?</p>	<p>Substantial mitigation is provided across the site and secured through S106 obligations</p>	<p>N/A</p>	<p>The development already has planning permission and the reserved matters accord with the parameters set by that permission.</p> <p>There are no technical objections outstanding in relation to ecological (or any other) matters.</p>
<p>Comment 6- Why does MSDC not consider the cumulative effects of the large number of planning application -</p>	<p>All relevant major applications in the area are considered as part of the cumulative assessment.</p>	<p>N/A</p>	<p>SnOasis already has planning permission. Its nature and constituent uses are already fixed.</p>

<p>approved and pending - in the area? The high level of developments in the area are putting pressure on resources and infrastructure and increasing the failure of MSDC and developers to deliver sustainable development.</p>			<p>Additional environmental information forms the ES, which has been independently verified as satisfactory.</p> <p>Highway infrastructure obligations form part of the s106 agreement.</p>
--	--	--	---