

Consultee Comments for Planning Application DC/19/02878

Application Summary

Application Number: DC/19/02878

Address: Land Off Church Road Church Road Old Newton IP14 4EF

Proposal: Outline Planning Application(some matters reserved - Access and Landscaping to be considered)-Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Case Officer: Vincent Pearce

Consultee Details

Name: Mrs Karen Price

Address: Lynwood, Grove Road, Brockdish, Bacton Stowmarket, Nr Diss, Norfolk IP21 4JP

Email: parish.clerk@oldnewtonpc.co.uk

On Behalf Of: Old Newton With Dagworth And Gipping Parish Clerk

Comments

There have been two opportunities for the community to add their views. This application was discussed at an extra planning meeting on 26th June 2019 and at the July monthly parish council meeting on 3rd July 2019. 23 members of the public attended both meetings who were all objecting to this application. Members of the public have been advised to submit their own comments to MSDC Planning department.

Firstly, many residents to this application have reported not receiving any consultation letters, some have but not all. The parish council were asked to raise this with MSDC.

It was stated that this is felt to be severely out of proportion to what a hinterland village is expected to build, with what is actually needed and what is being suggested within this planning application. MSDC now have their 5year land supply and this has been tested. The village is designated as a hinterland village in the consultation draft July 2019 local development plan and as such feel that the village has already met our requirement. The area of land is not included in the consultation draft July 2019 local development plan as an area for development and is therefore outside the settlement boundary.

Designated building needs are already exceeded for what can be reasonably expected for our village as a designated hinterland village. Neighbouring villages such as Bacton are being expected to have 51 houses built and Haughley are expected to build 98, both of these neighbouring villages are Core villages. Old Newton is designated as a hinterland village and is being asked to build in excess of 47 new houses on the Finningham Road site and 64 on this site a total of 111 new houses. Our own housing needs survey statistics stated that there was a need for 11 additional houses within our village and a suggestion of 30 houses in total was deemed more than sufficient for the size of our village.

Cllrs felt that the current infrastructure within the village is simply not sustainable given that the village shares health services with the neighbouring core villages of Bacton, Mendlesham and Haughley. The Primary School is already exceeding full capacity. Current Pan statistics for Old Newton Primary are 73, current numbers are 105. Many parents are walking to the school and church and this will have an impact on health and safety as there are no footpaths and walking from the proposed new development will not be sustainable with the lack of footpaths to the school and church. Equally parking at the school is also already an issue that will be exacerbated further.

The proximity to listed buildings is a concern and poses harm to the special landscape and character setting of Grade II listed buildings and will create an urbanisation of the plot which will erode the open spacious characteristics this site creates in connection and relation to the predominant openness of the land in question. The proposed development will encroach on the setting of several Grade II listed buildings. The harm identified is considered to outweigh the benefits of the development as determined in the NPPF (national planning policy framework). This application is contrary to Local Plan Policies FC1 presumption in favour of sustainable development, H07 restricting housing development unrelated to needs of countryside, preserve the countryside and character of an area due to the form of this development that is contrary to a prevailing pattern, character and form of existing development whilst encroaching into the countryside which is restricted by policy H7. SB02 development appropriate to its setting, SB03 - retaining visually important open spaces, H15 - Development to reflect local characteristics, CL08 protecting wildlife habitats and HB01- protection of historic buildings all refer.

Turning areas within the proposed development are minimal, legal but not really adequate. There is only one way in and out of the development, insufficient parking spaces will impact on additional parking on Church Road which is already an obstacle course at busy times. Church Road is already a narrow small road and will not easily take additional uplift in traffic that will in turn have an impact on the junction at the Shoulder of Mutton cross-roads. The B1113 is already a designated lorry route and Church Road has several farming businesses whereby large lorries are already struggling on this road. T09 policy refers parking standards and T10 Highway considerations in development apply. The proposed access to the development is directly opposite existing properties which will have an impact on them being severely overlooked and privacy issues to the properties opposite the access point.

In summary the impact on the special rural character, landscape, appearance of the area would constitute significant and demonstrable harm, which outweighs the benefit of developing 64 houses when assessed in the light of the NPPF and Cllrs believe this does not constitute sustainable development due to the social and environmental harm that will be caused. It was proposed that we object to this application using the discussion points above, this was seconded with all Cllrs present unanimously in favour. The Parish Council Recommend that MSDC refuse this application.

Karen Hall-Price

Parish Clerk & RFO Old Newton with Dagworth & Gipping Parish Council

Email: parish.clerk@oldnewtonpc.co.uk

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 08 July 2019 14:49
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: DC/19/02878

Application ref: DC/19/02878
Our ref: 286439

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
Operations Delivery
Consultations Team
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire, CW1 6GJ

Tel: 0208 0268349
Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

From: Crisell Chris (Suffolk NHS) <Chris.Crisell@suffolk.nhs.uk> **On Behalf Of** planning.apps
Sent: 05 July 2019 09:42
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: Planning Application Reference: DC/19/02878

Please be aware of the response from the Clinical Commissioning Group with regards to the planning application reference in the subject.

The CCG will not be requesting CIL contributions from this planning application.

Regards

Estates Planning Support
Ipswich & East Suffolk CCG & West Suffolk CCG
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
planning.apps@suffolk.nhs.uk
www.westsuffolkccg.nhs.uk
www.ipswichandeastsuffolkccg.nhs.uk

Your Ref:DC/19/02878
Our Ref: SCC/CON/3959/19
Date: 1 October 2019



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Katherine Hale

Dear Katherine,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION REF: DC/19/02878

PROPOSAL: Outline Planning Application(some matters reserved - Access and Landscaping to be considered)-Erection of up to 64 dwellings (including up to 22 affordable dwellings)

LOCATION: Land Off Church Road , Church Road, Old Newton, IP14 4EF

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

COMMENTS

The proposal for 64 dwellings would create approximately 40 vehicle movements within the peak hour (1 vehicle every 1.5 minutes) therefore the additional vehicles from the development will not have a severe impact on the capacity of the highway network in the area.

With the proposal to create a footway, provide an uncontrolled crossing point from the site to the footway network, providing safe links for pedestrians and cyclists to the village, this will change the 'feel' from a rural road to a built up area and as the existing 85%ile speeds are 33mph, we can accept the reduction in visibility standards to Manual for Street.

To promote, encourage and support the principles of sustainable transport as outlined in the National Planning Policy Framework, safe and suitable access is required for bus services, pedestrians and cyclists to and from the site.

There are existing bus stops within walking distance of the site with footway links but there is a limited bus service and the catchment primary is within walking distance (approx. 0.8 miles) but there is not a safe walking route for the vulnerable user so the site may not be considered to be in a sustainable location.

Developer needs to contact Public Rights of Way in the Definitive Map team (definitivemaps@suffolkhighways.org) to get the digital line for the legal alignment of FP47 Old Newton

with Dagworth. The stile which is on FP47 where it meets Greenacres is to be removed and make improvements to the access point to make it more accessible.

Ensure that any landscaping does not obstruct the alignment the footpath leaving at least 3.5m which will allow for seasonal growth of any hedges.

The development would not have a severe impact on the highway network (NPPF para 109) therefore we do not object to the proposal.

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:

V 1 - Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. &EX18-207-11-100A with an X dimension of 2.4m and a Y dimension of 49m and 52m 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.

AL10 - Condition: Before the development is commenced, details of the access and associated works, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

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

ER 1 - Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

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

ER 2 - Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

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

P 2 - Condition: Before the development is commenced, details of electric vehicle charging points and secure, covered cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be in accordance with Suffolk Parking Guidance 2015 and 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 promote the use of sustainable travelling alternatives within the area and use of electric vehicles.

B 2 - Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

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

HGV CONSTRUCTION - Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- Means of access for construction traffic
- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase

- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- 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: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

NOTES

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

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.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

Your Ref:DC/19/02878
Our Ref: SCC/CON/2483/19
Date: 4 July 2019



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
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/19/02878**

PROPOSAL: Outline Planning Application (some matters reserved - Access and Landscaping to be considered) - Erection of up to 64 dwellings (including up to 22 affordable dwellings).

LOCATION: Land Off Church Road, Church Road, Old Newton IP14 4EF

Notice is hereby given that the County Council as Highways Authority recommends a holding refusal on this permission for the following reasons:

The proposed visibility splays for the access of the development are shown as X distance at 2.4m setback with 43m Y distance - these dimensions not sufficient for this class of road (C407). The required visibility splays for a 30mph speed limit are $x=2.4m$ and $y=90m$, as standards in the Design Manual for Roads and Bridges. However, a lower standard of visibility can be accepted if the 85%tile speeds are 30mph; a speed survey is required as evidence of actual speeds.

Public Rights of Way team has the following comments:

- the developer needs to contact the Definitive Map team to get the digital line for the legal alignment of FP47 Old Newton with Dagworth, as lit does not look correct on the drawing supplied. they can be contacted by email - definitivemaps@suffolkhighways.org
- The stile which is currently the access to the development site from FP47 where it meets Greenacres is to be removed and make improvements to the access point.
- The planting scheme must not obstruct the alignment of FP47 and ensure a gap of 3.5 metres so that the path is not obstructed with growth.

At present, we would recommend that permission for the application be refused unless the above points can be addressed, and we look forward to receiving further information.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

From: Chris Ward <Chris.Ward@suffolk.gov.uk>

Sent: 20 June 2019 14:11

To: John Pateman-Gee <John.pateman-Gee@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/19/02878

Dear John,

Thank you for consulting me about the proposed residential development at Land off Church Road in Old Newton. I will be providing a response on the Travel Plan and other sustainable transport measures that was submitted as part of the planning application, however this will form part of the Suffolk County Council Highway response that Sam Harvey is leading on to comply with internal protocol.

Kind regards

Chris Ward

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

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/F221453
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 28/06/2019

Dear Sirs

Land off Church Road, Old Newton IP14 4EF
Planning Application No: DC/19/02878/OUT
Hydrants are required for this development
(see our required conditions)

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.

Sprinklers Advised

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: Hydrant requirement letter

Copy: admin@artisan-pps.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: 28 June 2019

Planning Ref: DC/19/02878/OUT

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land off Church Road, Church Road, Old Newton IP14 4EF
DESCRIPTION: 64 Dwellings
HYDRANTS REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority require 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, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.

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

Water Officer

Suffolk Fire and Rescue Service

OFFICIAL

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/19/02878
Our ref: Old Newton – land off Church Road
00057714
Date: 25 June 2019
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear John,

Old Newton: land off Church Road – developer contributions

I refer to the proposal: outline planning application (some matters reserved – access and landscaping to be considered) – erection of up to 64 dwellings (including up to 22 affordable dwellings).

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. Babergh and Mid Suffolk District Councils undertook a ‘Further Call for Sites Submissions – March 2018’ which will form part of the Preferred Options Stage later in 2019. The Joint Local Plan Regulation 18 Draft is due to be considered by Mid Suffolk District Council at its Council meeting on 27 June 2019.

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

Whilst some infrastructure requirements will be covered under Mid Suffolk District Council’s Regulation 123 list of the CIL charging schedule it is nonetheless the Government’s intention that all development must be sustainable as set out in the National Planning Policy Framework (NPPF). On this basis, the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.

The National Planning Policy Framework (NPPF) paragraph 56 sets out the requirements of planning obligations, which are that they must be:

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

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

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

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

The emerging Joint Local Plan contains policy proposals that will form an important tool for the day to day determination of planning application in both districts. Infrastructure is one of the key planning issues and the Infrastructure chapter (page 65, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017) states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

The Joint Local Plan proposals include:

- a) All new development should be supported by, and have good access to, all necessary infrastructure. Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development (Page 67, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017).
- b) A draft policy is similarly drafted to address education provision as follows: Development must be supported by provision of infrastructure, services and facilities that are identified to serve the needs arising from new development (Page 67, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017).

Under Strategic policies in paragraph 20 of the NPPF it says “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (in line with the presumption in favour of sustainable development) for:

- c) community facilities (such as health, education and cultural infrastructure).”

Under Decision-making in paragraph 38 of the NPPF it says “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

In determining applications paragraph 48 of the NPPF says “Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

Community Infrastructure Levy

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

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

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

However, new CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) will come into force on 1 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

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

- 1. Education.** Paragraph 94 of the NPPF states: ‘It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative

approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

Furthermore, the NPPF at paragraph 104 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;'

The Department for Education (DfE) publication 'Securing developer contributions for education' (April 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised March 2019]. Paragraph 19 of the DfE guidance states, "We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including both temporary and permanent education needs where relevant, such as school transport costs and temporary school provision before a permanent new school opens within a development site".

In paragraph 15 of the DfE guidance 'Securing developer contributions for education' it says, "We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors".

The most recent scorecard is 2017 and the national average school expansion build cost per pupil for primary schools is £16,088. The most recent (10 May 2019) BCIS location factor for the East of England, which includes Suffolk, is 104. When applied to the national expansion build cost (£16,088 x 1.04) produces a total of £16,732 per pupil for permanent expansion of primary schools.

The most recent scorecard is 2017 and the national average school expansion build cost per pupil for secondary schools is £21,448. The most recent (10 May 2019) BCIS location factor for the East of England, which includes Suffolk, is 104. When applied to the national expansion build cost (£21,448 x 1.04) produces a total of £22,306 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, "further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place".

SCC anticipates the following **minimum** pupil yields from a development of 62 dwellings, namely:

- a) Primary school age range, 5-11: 15 pupils. Cost per place is £16,732 (2019/20 costs).
- b) Secondary school age range, 11-16: 10 pupils. Cost per place is £22,306 (2019/20 costs).
- c) Secondary school age range, 16+: 2 pupils. Costs per place is £22,306 (2019/20 costs).

The local catchment schools are Old Newton Church of England Primary School, and Stowupland High School.

Based on existing primary school forecasts and taking into account this proposed development, the school will have more pupils requiring a place than there are available places. The school has a pupil admission number (PAN) of 15 – total capacity is 105-places, with 100-places assuming an operational flexibility of 5% for mid-year admissions etc. It is unlikely that the school can be expanded due to building constraints, so the admissions policy will be applied when the school becomes oversubscribed. The next nearest primary school to the proposed development is at Haughley, but this school is also forecast to be oversubscribed and cannot be expanded. The next nearest school with the potential for future expansion is Freeman Community Primary School in Stowupland. On this basis, at the primary school level a future CIL funding bid of at least £250,980 (2019/20 costs) will be made.

Based on existing secondary school forecasts, SCC will have no surplus places available at the catchment secondary school. On this basis, at the secondary school level a future CIL funding bid of at least £267,672 (2019/20 costs) will be made.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

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

The recently published guidance from the Department for Education on Delivering schools to support housing growth states in paragraph 16: “Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”.

From these development proposals SCC would anticipate up to 6 pre-school children arising, at a cost per place of £16,732. However, there are some existing surplus places in the Bacton and Old Newton ward.

- 3. Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: ‘Promoting healthy and safe communities.’ A key document is the ‘Quality in Play’ document fifth edition published in 2016 by Play England.
- 4. Transport issues.** Refer to the NPPF Section 9 ‘Promoting sustainable transport’. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

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

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2015).

- 5. Libraries.** Refer to the NPPF Section 8: ‘Promoting healthy and safe communities’.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £13,392, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

- 6. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government’s

ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

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

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

SCC has a project underway to identify a new HWRC site for the Stowmarket catchment area. Likely cost of a new HWRC is between £3m and £5m. This is a priority site in the Waste Infrastructure Strategy and it is hoped that budget will be identified for this purpose. However, the Waste Service would expect a contributions of £110 per household from any significant development in this area. In this case a capital contribution of £6,820 would be applicable.

- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category

M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

8. Sustainable Drainage Systems. Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

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

9. Ecology, landscape & heritage. These are matters for Mid Suffolk District Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals.

10. Fire Service. Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.

11. Superfast broadband. This should be considered as part of the requirements of the NPPF Section 10 'Supporting high quality communication'. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

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

12. Legal costs. SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

13. The above information is time-limited for 6 months only from the date of this letter.

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

Yours sincerely,

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

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

Growth, Highways and Infrastructure
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

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

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

Our Ref: 2019_02878
Date: 21/06/2019

For the Attention of Vincent Pearce

Dear Mr Isbell

Planning Application DC/19/02878 – Land off Church Road, Old Newton: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. The area of the road frontage is directly adjacent to a Medieval moat (ONW 022). Thus, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following conditions would be appropriate:

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

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

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation

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

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

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).

INFORMATIVE:

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

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

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

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

Yours sincerely,

Dr Hannah Cutler

Archaeological Officer
Conservation Team

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 25 June 2019 11:25
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Cc: John Pateman-Gee <John.pateman-Gee@baberghmidsuffolk.gov.uk>
Subject: 2019-06-25 JS Reply Land Off Church Road , Church Road, Old Newton, IP14 4EF Ref DC/19/02878

Dear John Pateman-Gee,

Subject: Land Off Church Road , Church Road, Old Newton, IP14 4EF Ref DC/19/02878

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/02878.

The following submitted documents have been reviewed and we recommend **approval of this application.**

- Ordnance Survey Location Plan Ref 3773-01C
- Flood Risk Assessment and SuDs Strategy Ref EX1820711
- Desk Based Contaminated Land Assessment Ref 72835/R/002

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to 7.0l/s for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. 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;
 - e. 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;
 - f. Topographical plans depicting all exceedance flow paths 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;
 - g. 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:

- i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 1. Temporary drainage systems
 2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 3. Measures for managing any on or offsite flood risk associated with construction
- h. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

2. 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 2010 in order to enable the proper management of flood risk with the county of Suffolk.

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- 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 1991
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton
Flood & Water Engineer
Flood & Water Management
Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX
T: 01473 260411 | <https://www.suffolk.gov.uk/planning-waste-and-environment/flooding-and-drainage/>

Appendix A to the Suffolk Flood Risk Management Strategy has been updated! If you're involved in the planning, design and construction of new developments this may be of interest to you. You will be expected to comply with this new local guidance. More information can be found here; <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/>

Consultation Response Pro forma

1	Application Number	DC/19/02878 Church Road, Old Newton	
2	Date of Response	16.7.2019	
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"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the rural character of the setting of nearby listed buildings, in particular of Pond Farmhouse. 2. The harm is rated low. 3. The Heritage Team recommends that layout and landscaping are revised to reduce impact on the setting of the listed buildings, in particular of Pond Farmhouse. 	
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 team gave advice at pre-application stage on a proposal at the site. The site for the application scheme is extended further to the south than at pre-application.</p> <p>Our advice was that there would be a low level of harm to the significance of the listed buildings Pond Farmhouse and Burnham Cottages. Impact on the setting of the Pond Farmhouse would be moderated by the modest contribution made by the setting of Pond Farmhouse to its significance. Similarly the setting of Burnham Cottages makes low contribution to its significance, and the impact on setting would also be low.</p> <p>We recommended that alternative layout and possibly access arrangements be considered with a view to minimising the extent to which development would impinge on the settings of the buildings, in particular Pond Farmhouse. The final advice was that the open outlook from the listed building should be maintained as a green link.</p> <p>We note that compared with the pre-application plan, the site has been enlarged towards the south, allowing for establishment of a green buffer along the southern edge, and re-arrangement of public space and other undeveloped areas. To the south of Pond Farmhouse an open area is proposed with planting of new trees.</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>Beyond this is the access road, two pairs of dwellings and then the green buffer belt. This will serve to some degree to preserve the rural character of this part of the setting of the listed former farmhouse. But we are concerned that the landscaping proposed in this application and the location of two pairs of dwellings to the south of Pond Farmhouse will serve as a screen tending to separate the farmhouse from the land. In our view the enlargement of the site presents an opportunity to further reduce impact of the scheme on the setting of Pond Farmhouse, and we would encourage the agent and applicant to reconsider layout and landscaping in this area.</p> <p>We are concerned that layout is held back as a reserved matter but landscaping is part of this application. This appears to us to reverse the natural sequence because the determination of the landscaping at this stage could limit options for refinement of layout under 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 changes? Please ensure any requests are proportionate</p>	Revision of layout; consequent revision of landscaping.
7	Recommended conditions	

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.

From: Peter Chisnall <Peter.Chisnall@babberghmidsuffolk.gov.uk>
Sent: 08 July 2019 14:53
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/19/02878

Dear John,

Proposal: Outline Planning Application (some matters reserved - Access and Landscaping to be considered) - Erection of up to 64 dwellings (including up to 22 affordable dwellings).
Location: Land Off Church Road, Church Road, Old Newton, IP14 4EF

Many thanks for your request for comments in relation to the above application.

Environmental Protection has no objection to this proposal subject to the following.

I note that the applicant states in the Design and Access/Planning Statement "Policies COR CS3 and CS4 relating to climate change and renewable energy will be addressed in the specifics of the Reserve Matters and other technical reports submitted with that future application".

Should you grant permission we request a condition is included, this will help the applicant address the specifics as mentioned above:

Before works extend beyond foundation level a Sustainability Strategy detailing how the development can secure the required energy efficiency and sustainability standards (CS12,13&15) of the Local Planning Authority including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 110ltr 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 works extend beyond foundation level.

The development shall be implemented in accordance with the approved Sustainability Strategy and shall not commence above ground level until full Design Stage calculations under the National Calculation Method have been submitted to and approved in writing by the Local Planning Authority demonstrating that the development is capable of achieving the required standard in accordance with the approved Energy Strategy, and any subsequent approved revisions. Also details of the sustainability features of the dwellings including construction materials and other features must be presented to the authority.

Prior to first occupation of the building(s), evidence (e.g. photographs, commissioning certificates and As-Built paperwork derived from the National Calculation Methodologies) which demonstrates that the development has been constructed in accordance with the approved Energy Strategy (and any subsequent approved revisions) should be submitted to the Local Planning Authority and approved in writing.

Reason - In order to ensure the long-term sustainability of the development through on-site use of sustainable building techniques, passive design, renewable resources, and to ensure that the development makes the fullest contribution to minimising carbon dioxide emissions in accordance with the development plan.

Note: The document must clearly set out the *unqualified* commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Clear commitments and minimum standards should be declared and phrases such as 'where possible, subject to, where feasible' must not be used.

Evidence should be included where appropriate demonstrating the applicants previous good work and standards achieved in areas such as site waste management, eg what recycling rate has the applicant achieved in recent projects to show that their % recycling rate commitment is likely.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/>
<https://www.babergh.gov.uk/environment/environmental-management/planning-requirements/>

Regards,

Peter

Peter Chisnall, CEnv, MIEMA, CEnvH, MCIEH
Environmental Management Officer
Babergh and Mid Suffolk District Council - Working Together
Tel: 01449 724611
Email: peter.chisnall@baberghmidsuffolk.gov.uk
www.babergh.gov.uk www.midsuffolk.gov.uk

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Vincent Pearce, Development Management

FROM: Joanna Hart, Environmental Protection Team

DATE: 26.06.2019

YOUR REF: DC/19/02878

SUBJECT: Land Off Church Road Church Road Old Newton IP14 4EF
Outline Planning Application (some matters reserved - Access and Landscaping to be considered)-Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Please find below my comments regarding noise/odour/light/smoke matters only.

Thank you for your consultation on the above application. Environmental Protection have no objections in principle to the development.

However, the proposed development will be in close proximity to existing dwellings and I would therefore recommend that the following conditions are attached to any permission, in the interests of protecting amenity:

1. No burning shall take place on the site at any stage during the sit clearance/construction process
2. Hours of construction (including deliveries to site) shall be limited to 08.00 – 18.00hrs Monday – Friday, 09.00 – 13.00 hrs Saturdays with no working to take place on Sundays or public holidays.
3. No development shall commence until a construction management plan has been submitted to and approved in writing by the Local Planning Authority. The construction management plan shall include details of:
 - Operating hours
 - Means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors)
 - Loading and unloading of plant and materials
 - Wheel washing facilities
 - Hours of operation and vehicle movements
 - Lighting
 - Location and nature of compounds and storage areas (including maximum storage heights) and factors to prevent wind-whipping
 - Waste storage and removal
 - Temporary buildings and boundary treatments
 - Dust management measures
 - Noise and vibration management (to include arrangements for monitoring, and specifically for piling, if proposed) and;
 - Litter management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Note: The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP.

4. I note that the development includes some areas of public open space. If play equipment is proposed for these locations, then I would recommend that no such equipment (or associated lighting) be installed until such time as a scheme of equipment is submitted to and approved by the LPA, in order to confirm that it is not likely to result in loss of amenity at nearby premises.
5. No illumination shall be installed until such time as a written scheme has been submitted to be submitted to and agreed in writing by the local planning authority that specifies the provisions to be made for the level of illumination of the site and to control light pollution. The scheme shall be implemented prior to beneficial use of the approved development and maintained for the lifetime of the approved development and shall not be altered without the prior written approval of the local planning authority. The scheme shall provide that each pole/wall counted light must be aligned to ensure that the upper limit of the main beam does not exceed 70 degrees from its downward vertical. All pole/wall mounted lighting shall be designed and operated to have full horizontal cut-off such that the Upward Waste Light Ratio does not exceed 2.5%. The submitted scheme shall include an isolux diagram showing the predicted luminance in the vertical plane (in lux) at critical locations on the boundary of the site and at adjacent sensitive properties (including those within the scheme where appropriate).

Note: The applicant's attention is drawn to the lighting scheme should comply with the Institution of Lighting Professionals Guidance Note for the reduction of obtrusive light 2011 (or later versions). It should be designed so that it is the minimum needed for security and operational processes and be installed to minimise potential pollution caused by glare and spillage).

Regards

Joanna Hart
Senior Environmental Protection Officer

From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 12 August 2019 09:01
To: John Pateman-Gee <John.pateman-Gee@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/19/02878. Air Quality

Dear John

EP Reference : 261516
DC/19/02878. Air Quality
Land off, Church Road, Old Newton, STOWMARKET, Suffolk.
Outline Planning Application(some matters reserved - Access and Landscaping to be considered)-Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Many thanks for your request for comments in relation to the above application. I can confirm that I have no objections to the proposed development from the perspective of air quality as the scale of the development is such that it would not be reasonable to expect that it would compromise the existing good air quality at the development site and surrounding locations.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk
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websites: www.babergh.gov.uk www.midsuffolk.gov.uk





07 October 2019

Katherine Hale
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

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/19/02878
Location: Land Off Church Road, Church Road, Old Newton, IP14 4EF
Proposal: Outline Planning Application (some matters reserved - Access and Landscaping to be considered) - Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Dear Katherine,

Thank you for re-consulting Place Services on the above application.

Holding objection due to insufficient ecological information

Summary

We have reviewed the Ecological Survey Report (MHE Consulting Ltd, April 2019) and Amphibian and Reptile Survey (MHE Consulting Ltd, August 2019), provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species/habitats.

We are still not satisfied that sufficient ecological information is currently available for determination of this application. This is because the Amphibian and Reptile Survey has only provided further surveys for reptiles. As a result, it does not provide the Local Planning Authority with certainty of impacts for Great Crested Newts.

The report summarises that Great Crested Newts are known to be breeding within the adjacent pond, approximately five metres of the application site, which was confirmed by an eDNA survey and visual observations during the Habitat Suitability Index in 2018. Consequently, due to the close proximity of the breeding pond, the species will likely be facilitating the terrestrial habitat on site for foraging and commuting purposes. Therefore, an offence to the European Protected Species is



considered highly likely and a Natural England European Protected Species Mitigation (EPSM) licence will be required, In order to avoid offences under the relevant legislation.

However, we are not satisfied that Great Crested Newt population surveys, to inform the EPSM licence application, can be secured prior to commencement. This is because paragraph 99 of the ODPM Circular 2005 highlights that: *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”* Therefore, the population surveys and mitigation and compensatory measures cannot be secured through pre-commencement planning condition, as suggested within the Amphibian and Reptile Survey.

The Local Planning Authority should only accept lower than standard survey effort prior to determination when the costs or delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring; when the ecological impacts of development can be predicted with sufficient certainty; and when the mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of the local population of Great Crested Newts.

In summary, the ecological impacts to the Great Crested Newt local population currently cannot be predicted and appropriate mitigation or compensation measures have not been demonstrated. As a result, we recommend that a Great Crested Newt Population Survey and mitigation strategy must be provided prior to determination of this application, following standard guidelines.

This further information is required to provide the LPA with certainty of impacts on legally protected and priority species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to provide the additional information to overcome the holding objection and support a lawful decision.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Ecological Consultant
Ecology.placeservices@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.



10 July 2019

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/19/02878
Location: Land Off Church Road, Church Road, Old Newton, IP14 4EF
Proposal: Outline Planning Application (some matters reserved - Access and Landscaping to be considered) - Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information

Summary

We have reviewed the Ecological Survey Report (MHE Consulting Ltd, April 2019) provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species/habitats.

We are not satisfied that sufficient ecological information is currently available for determination of this application. This is because the Ecological Survey Report has recommended that a Great Crested Newt presence/likely absence surveys in ponds adjacent to the site.

It is highlighted that Ecological Survey Report has identified Great Crested Newts within two ponds within the local area. Therefore, it is considered likely that a population size class assessment will also be required for this application. Consequently, a European Protected Species Mitigation (EPSM) licence may also need to be secured from Natural England for this application. It is highlighted that this would be secured by the LPA as a condition of any consent, prior to commencement.



These surveys are required prior to determination because paragraph 99 of the ODPM Circular 2005 highlights that: *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”*

Consequently, this further information is required to provide the LPA with certainty of impacts on legally protected and Priority species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to provide the additional information to overcome the holding objection and support a lawful decision.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson BSc (Hons) GradCIEEM MRSB
Ecological Consultant
Ecology.placeservices@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.

Consultee Comments for Planning Application DC/19/02878

Application Summary

Application Number: DC/19/02878

Address: Land Off Church Road Church Road Old Newton IP14 4EF

Proposal: Outline Planning Application(some matters reserved - Access and Landscaping to be considered)-Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Case Officer: Katherine Hale

Consultee Details

Name: Mr Tony Bass

Address: Endeavour House, Ipswich IP1 2BX

Email: tony.bass@baberghmidsuffolk.gov.uk

On Behalf Of: Communities (Major Development)

Comments

The provision of more natural based open space is suitable, albeit with some natural play features being incorporated as the village has a significant formal sports, recreation and play area in the vicinity of this proposed development.

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: John Pateman-Gee

From: Sacha Tiller - Housing Enabling Officer – Strategic Planning

Date: 3rd July 2019

Application Ref: **DC/19/02878**

Proposal: Outline Planning Application (some matters reserved – Access and Landscaping to be considered) – Erection of up to 64 dwellings (including up to 22 affordable dwellings).

Location: DC/19/02878 - Land Off Church Road, Church Road, Old Newton, IP14 4EF.

Key Points

1. Background Information

<ul style="list-style-type: none">• An outline development proposal for up to 64 residential dwellings.
<ul style="list-style-type: none">• This is an open market development and based on 64 units should offer 22 affordable housing units = 35% policy compliant position.

2. Housing Need Information:

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

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%

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

Ref3 Estimated proportionate demand for all tenure new housing stock by bedroom number	
Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

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

2.6 The Council's Choice Based Lettings system currently has circa. 730 applicants registered for affordable housing in Mid Suffolk as at March 2019.

3. Preferred Mix for Open Market homes.

3.1 There is a strong need for homes more suited to the over 55 age brackets within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. Mid Suffolk and the county as a whole faces a large increase in the population of over 65-year olds so we need to ensure there are suitable housing choices for older people to remain in their communities.

3.2 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities.

3.3 Furthermore, 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.
- 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.
- The affordable housing should be integrated into the scheme and not placed in one area however looking at the plan layout most of the proposed affordable housing does seem to be in one area.

Total number of proposed open marketing housing = 42 dwellings

3 x 2b bungalows @ 83sqm
 8 x 3b bungalows @ 96sqm
 9 x 2b houses @ 80sqm
 17 x 3b houses @ 93sqm
 5 x 4b houses @ 110-145sqm

4: Affordable Housing Mix:

4.1 The majority district wide need is for 1 and 2 bedrooms followed by 3 beds with a much smaller need for 4+ beds.'

4.2 The current registered need for affordable housing in Mendlesham is 9 applicants all are looking for 1 and 2 bedroom accommodation.

Proposed affordable Rent = 16

- 2 x 1b flats @ 50sqm
- 2 x 2b flats @ 65sqm
- 4 x 1b houses @ 66sqm
- 4 x 2b bungalow @ 75sqm
- 4 x 3b houses @ 93sqm

Proposed shared Ownership = 6

- 4 x 2b houses @ 79sqm
- 2 x 2b bungalows @ 75sqm

4.3 Having regard to the above housing information the proposed affordable and shared ownership housing we prefer would be:

Required affordable Rent = 17

- 2 x 1b 2 person flat @ 50sqm
- 2 x 2b 4 person flats @ 70sqm
- 4 x 2b 4 person bungalows @ 70sqm
- 5 x 2b 4 person houses @ 79sqm
- 4 x 3b 5 person houses @ 93sqm

Required shared Ownership = 5

- 3 x 3b 5 person houses @ 93sqm
- 2 x 2b 4 person houses @ 75sqm

5. Other requirements for affordable homes:

- Properties must be built to the Housing Standards Technical guidance March 2015 and Nationally Described Space Standards.
- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 75% of relets in perpetuity.
- For all shared ownership dwellings applicants must be registered with the Suffolk Homebuy agency.
- Initial share purchases for shared ownership dwellings to be capped at 75%.
- The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings. The affordable homes should be distributed across the different phases of the development.
- Adequate parking provision is made for the affordable housing units and cycle storage/sheds.

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>
Sent: 26 June 2019 14:36
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/19/02878

Hello Planning Support

The Public Realm Team support the proposed treatment of the public open spaces on the edge of this proposed development. It is noted that there is no formal play provision within the scheme and would like to see some natural play elements incorporated into the public open spaces.

It is anticipated that the future maintenance of this site would be undertaken at a local level rather than expecting the District Council to adopt the open spaces in the future

Regards

Dave Hughes
Public Realm Officer