

Consultee Comments for Planning Application DC/18/04247

Application Summary

Application Number: DC/18/04247

Address: Land Off Bury Road The Street Woolpit IP30 9SA

Proposal: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

Case Officer: Bradly Heffer

Consultee Details

Name: Mrs Peggy Fuller

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

Email: peggy.woolpitpc@btinternet.com

On Behalf Of: Woolpit Parish Clerk

Comments

Woolpit Parish Council objects to this application for the following reasons:

1. Woolpit currently has approximately 900 houses and planning approval has recently been granted for a further 169. With the 300 from this application, the number of homes in the village will rise by some 50%. This is a disproportionate increase which will overwhelm the village and its facilities and destroy the unique character of Woolpit. A village would become a town.
2. The traffic through the village is already an issue for the many listed buildings in the conservation area and the additional traffic from 300 more houses, much of which will use the village centre, would have a serious detrimental effect on the mediaeval core. The narrow pavements and pinch points of the centre will create additional congestion and make pedestrian safety a serious issue.
3. Sustainability. The development is not sustainable within the definition of the NPPF, in that it does not meet the needs of the present without compromising the ability of future generations to meet their own needs.
Firstly, the economic objective is not met. Economic sustainability builds a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
We have seen no evidence that this development is of the right type, in the right place or at the right time to support growth. We have seen no evidence that it will support innovation or improve productivity locally.
We also have concerns about infrastructure. Although the railway station at Elmswell is close by, it

is very difficult to get to without using a car. Cycling is dangerous and walking the short distance is terrifying. There is no mention of increased bus services, which are limited during the day and non-existent in the evening. The lack of access to public transport coupled with the easy access to the A14 in both directions means that those living here will be encouraged to drive rather than use public transport. This also has implications for a transition to a low carbon economy (see below under environmental sustainability).

Secondly, the social objective is not met. Social sustainability supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; it fosters a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being.

The huge scale of the proposed development, in conjunction with other developments already granted planning consent locally, means it cannot be socially sustainable. Over 170 new dwellings already have planning consent in the parish, and the 300 proposed here will take the total to over 470 a more than 50% increase in the number of dwellings in the parish. This will overwhelm the village in terms of infrastructure and social cohesion, and the estate risks being seen as separate to the village. The easy access to the A14 in both directions means that the estate will be more dormitory than community.

Thirdly, the environmental objective is not met. Environmental sustainability contributes to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Services in the village centre are between 345 and 435m distant; this is roughly twice the desirable distance quoted in the transport assessment of 200m. The health centre is 790m away, nearly twice the desirable distance of 400m. It seems likely that vehicular transport will be used to access the centre of the village and certainly the health centre. This is unsustainable in terms of transition to a low carbon economy.

4. Wildlife. The site is locally important for wildlife. The ecological survey acknowledges the high number of skylarks, a red-list species in severe decline, nesting in the fields; skylarks are in decline due to loss of habitat, and this development cannot be mitigated in a way that will not contribute to their decline. It also found evidence that eight of the 17 UK bat species roost or forage here, that there is good evidence for common lizards and that there are great crested newts that will be affected by the development. Local mitigation may be possible for these, but the continued piecemeal loss of habitat is not sustainable. The ecological survey mentioned two owl species, little owl and barn owl, but did not apparently find the tawny owl well known to those living on this side of the village, nor the hedgehogs which are found on both sides of Bury Road. Increased street lighting will be to the detriment of Woolpits dark skies (it is a relatively dark village for its size, with few street lights) and to the detriment of bats, owls and night-time pollinators such as moth species.

Increased traffic on Bury Road will be detrimental to those species which are vulnerable to road

traffic, such as hedgehogs and barn owls.

5. Proposals do not provide for a footpath and cycle links to Elmswell to give access to the railway station. Proposals should incorporate a cycle track link to the village through Rectory Lane and a cycle track to Elmswell. A safe crossing for the pedestrian/cycle track at the existing roundabout at J47 interchange of the A14 is required.

6. No improvements are proposed to the narrow footway between Wrights Way and Windmill Avenue (Woolpit Business Park entrance). There will be a considerable increase in traffic along this section of road with vehicles accessing the business park through the new link road from the A14 which will significantly increase the danger to the many pedestrians who use the path. The width of the existing path requires many pedestrians, and particularly wheel chair users and those with pushchairs, to walk in the road.

7. Heavy vehicles should not be allowed to use the spine road to access Woolpit Business Park from the A14 but should be required to take their existing route via the A1088. The spine road would be a residential street which should have a weight restriction imposed together with traffic calming and a 20 mph speed restriction.

8. Historic England is concerned for the setting of the Grade 1 listed St Marys parish church. They say that they are concerned that development of the application site would result in harm to the significance of the listed building and it would not achieve the NPPF overarching aim of promoting sustainable development.

9. This site has open and extensive views across to Norton Wood and to the church tower of Elmswell which will be damaged by the development. The views inward are from the A14 and White Elm road of the village with the Woolpit church spire. These views are of significant importance to the village - in the words of the Landscape Appraisal undertaken for Woolpit Neighbourhood Plan they are "distinctive and valuable". The appraisal also says, "Development in this area also has the potential to alter the settlement form and character, undermine the rural setting to the church and alter perceptions of arrival." There will also be some loss of public amenity in the form of views over Street Farm from White Elm Road, Bury Road, and Hay Barn Meadow.

10. Provision should be made for housing for older people. The village questionnaire which is part of the emerging Neighbourhood Plan shows there is a high demand for accommodation which would allow older people to relocate within the village without leaving the community in which they have lived for many years.

11. Land on the application site at the junction of Bury Road and White Elm Road is higher than that of the existing adjacent homes in White Elm Rd which will be overlooked and dominated by new properties.

12. Provision for a new primary school should not be included whilst discussions are currently taking place with Suffolk County Council for an extension of the existing school.
13. Hopkins Homes originally proposed 600 houses on their 90 acre site. They are now proposing 300 units on about half this area. If this development proceeds, it is probable that there will be an application for a further 300 units in due course.
14. The site is high quality grade 2 agricultural land.
15. A site inspection should be carried out by members of the Planning Committee before the application is determined.



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
Operations (East)
planningee@highwaysengland.co.uk

To: Mid Suffolk District Council

CC: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: DC/18/04247

Referring to the planning application referenced above, dated 28 September 2018, application for the erection of up to 300 dwellings, construction of new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure, land off Bury Road, The Street, IP30 9SA, notice is hereby given that Highways England's formal recommendation is that we:

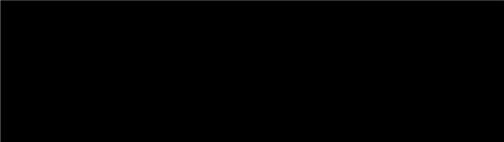
- a) ~~offer no objection;~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);
- c) ~~recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- d) ~~recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is ~~is~~ not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents Highways England formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gsi.gov.uk.

Signature: 	Date: 15 October 2018
Name: David Abbott	Position: Spatial Planning Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW david.abbott@highwaysengland.co.uk	

Annex A Highways England recommended Planning Conditions

HIGHWAYS ENGLAND has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regards to DC/18/04247 and has been prepared by David Abbott.

The proposed development consists of 300 dwellings, a primary school and other community infrastructure on land adjacent to junction 47 of the A14 at Woolpit in Mid Suffolk. The developer's transport consultants engaged with us in pre-application discussions earlier this year to discuss the development, their access proposals and the potential implications for the SRN.

One of the proposed principle accesses to the development site involves changes to the layout of the slip road arrangement at junction 47 by replacing the current priority 'T' junction layout with a roundabout incorporating an additional arm to serve the development site. We offered advice on the scope of the assessment that would be

required for our purposes, and this was duly undertaken to our specification and incorporated in the transport assessment submitted alongside the application.

The applicant has demonstrated that their proposed works at junction 47 will operate satisfactorily both for their development and for the SRN. Our conclusion, therefore, would be to recommend the proposed changes to junction 47 are implemented in a timely manner, and our formal recommendation is given below.

The applicant should be advised that they will need to enter into an agreement under section 278 of the highways act 1980 with one or both of the highway authorities to procure and implement the highway works depending on the relative extents of works on the SRN and local roads. For the avoidance of doubt, we should point out that all works on the SRN will need in all respects to comply with the Design Manual for Roads and Bridges.

We therefore recommend that the following condition be attached to any planning permission:

- **prior to the beneficial occupation of any part of the proposed development (or an alternative development trigger point subsequently agreed in writing with the local planning authority in consultation with Highways England), mitigation measures for A14 junction 47 broadly conforming to Waterman drawing number IHD015/004/HG/104 (or subsequent version agreed in writing with the local planning authority in consultation with Highways England) shall be implemented and opened to traffic.**

Reason: to ensure the strategic road network continues to operate safely and efficiently.



Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email planningliaison@anglianwater.co.uk.

AW Site 109394/1/0002192

Reference:

Local Mid Suffolk District

Planning

Authority:

Site: Land Off Bury Road The Street Woolpit IP30 9SA

Proposal: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

Planning DC/18/04247

application:

Prepared by: Pre-Development Team

Date: 2 November 2018

ASSETS

Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

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

Section 3 - Used Water Network

Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. (if we can be more specific e.g. a full assessment cannot be made due to lack of information, the applicant has not identified a discharge rate) We therefore request a condition requiring phasing plan and/or on-site drainage strategy (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

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

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments in the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

Section 5 - Suggested Planning Conditions

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

Used Water Sewerage Network (Section 3)

Condition Prior to construction above damp proof course a Phasing Plan setting out the details of the phasing of the development shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in complete accordance with the approved Phasing Plan. Reason To ensure the development is phased to avoid an adverse impact on drainage infrastructure. Condition Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme. Reason To prevent environmental and amenity problems arising from flooding

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

Next steps

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

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

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

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

Foul water:

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

Surface water:

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

Bradly Heffer
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2018/123343/05-L01
Your ref: DC/18/04247
Date: 28 November 2019

Dear Mr Heffer

OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED) ERECTION OF UP TO 300 DWELLINGS, CONSTRUCTION OF A NEW SPINE ROAD, LAND FOR A NEW PRIMARY SCHOOL, BURIAL GROUND EXTENSION, VILLAGE CAR PARK AND ASSOCIATED INFRASTRUCTURE.

LAND OFF BURY ROAD THE STREET WOOLPIT IP30 9SA

Thank you for your consultation dated 8 November 2019. We have reviewed the application as submitted and are able to remove our holding objection previously raised for this application. We therefore have no objections providing the below conditions on Groundwater and Contaminated Land are appended should the permission be granted.

Groundwater and Contaminated Land

We have reviewed the Harrison Geotechnical Site Investigation Report referenced GC20560_SI and dated 05 May 2017.

Based on our review of the information provided, we are now able to remove our previous holding objection to the development.

The proposed development will be acceptable only if the following planning condition is included on the planning permission.

Condition 1

All burials in the cemetery shall be:

- At least 250 metres from any well, borehole or spring supplying water for human consumption or used in food production – for example at farm dairies
- At least 30 metres from any spring or watercourse not used for human consumption or not used in food production
- At least 10 metres from any field drain, including dry ditches In addition:
- No burial is to take place into standing water

- The base of each grave must be at least 1 metre above the local water table

Reason for Condition 1

To protect the quality of controlled waters in the local area.

The developer should address risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.

Condition 2

If, during development, contamination not previously identified is found to be present at the site then the development should cease and the local planning authority should be informed in writing. In such case, a remediation strategy should be developed and submitted to the local planning authority detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as detailed.

Reason for condition 2

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

Further advice can be found in the appendix at the end of the letter.

We trust this advice is useful.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

Direct e-mail Liam.Robson@environment-agency.gov.uk

cc Bidwells Property Consultants

Appendix 1 –General Advice to Applicant

1. Preliminary Risk Assessment

The PRA should include historical plans of the site, an understanding of the sites environmental setting (including geology, hydrogeology, location and status of relevant surface water and groundwater receptors, identification of potential contaminants of concern and source areas), an outline conceptual site model (CSM) describing possible pollutant linkages for controlled waters and identification of potentially unacceptable risks. Pictorial representations, preferably scaled plans and cross sections, will support the understanding of the site as represented in the CSM.

1. Site Investigation

Land contamination investigations should be carried out in accordance with BS 5930:1999-2010 'Code of Practice for site investigations' and BS 10175:2011 'Investigation of potentially contaminated sites - Code of Practice' as updated/amended. Site investigation works should be undertaken by a suitably qualified and experienced professional. Soil and water analysis should be fully MCERTS accredited. Any further site investigation, demolition, remediation or construction works on site must not create new pollutant pathways or pollutant linkages in to the underlying principal aquifer to avoid generating new contaminated land liabilities for the developer. Clean drilling techniques may be required where boreholes, piles etc penetrate through contaminated ground.

1. SuDS

We consider any infiltration Sustainable Drainage System (SuDS) greater than 2.0 m below ground level to be a deep system and are generally not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.

Soakaways must not be constructed in contaminated ground where they could re-mobilise any pre-existing contamination and result in pollution of groundwater.

Soakaways and other infiltration SuDS need to meet the criteria in our Groundwater Protection Position Statements G1 and G9 to G13.

Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components.

We recommend that developers should:

1. Refer to our [Groundwater Protection](#) webpages, which include the [Groundwater Protection Position Statements](#)
2. Follow the [Land Contamination: Risk Management](#) guidance when dealing with land affected by contamination
3. Refer to the [CL:AIRE Water and Land Library \(WALL\)](#) which includes the [Guiding Principles for Land Contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health
4. Refer to our [Land Contamination Technical Guidance](#)
5. Refer to [Position Statement on the Definition of Waste: Development Industry Code of Practice](#)
6. Refer to British Standards BS 5930:1999 A2:2010 *Code of practice for site investigations* and BS10175:2011 A1: 2013 *Investigation of potentially contaminated sites – code of practice*

Refer to our [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination](#) National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment

Report', guidance on producing this can be found in Table 3 of [Piling Into Contaminated Sites](#)

7. Refer to our [Good Practice for Decommissioning Boreholes and Wells](#).
Refer to our [Dewatering building sites and other excavations: environmental permits](#) guidance when temporary dewatering is proposed GMP 21/11/2019

Bradly Heffer
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2018/123343/04-L01
Your ref: DC/18/04247
Date: 05 November 2019

Dear Mr Heffer

OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED) ERECTION OF UP TO 300 DWELLINGS, CONSTRUCTION OF A NEW SPINE ROAD, LAND FOR A NEW PRIMARY SCHOOL, BURIAL GROUND EXTENSION, VILLAGE CAR PARK AND ASSOCIATED INFRASTRUCTURE.

LAND OFF BURY ROAD, THE STREET, WOOLPIT, IP30 9SA

Thank you for your consultation dated 2 October 2019 with further information subsequently provided on 17 October 2019. We maintain our objection to the proposed development pending the submission and approval of additional information.

Groundwater and Contaminated Land

We have now reviewed the following documents that have been submitted in support of this application:

- 19 August 2019. E-mail from BMSDC re private water supplies
- 30 August 2019. E-mail from Harrison Group re unspecified tank on southern site boundary

It is understood that the Local Authority have confirmed that their records show that no private water supplies on or near to the site. It is further understood that the unspecified tank on the southern boundary of the site referred to previous correspondence most likely corresponds to a former silo or water tank relating to the historical Street Farm. However, at the time of review we are still awaiting submission and approval of HGE Report GC20560_SI dated May 2017 to the local authority website, as requested in our previous response referenced AE/2018/123343/03 and dated 13 August 2019.

Overcoming our objection

At this stage we are unable to remove our previous objection for development of the site

as a cemetery extension. Further information is required as outlined below:

- HGE Report GC20560-SI dated May 2017 should be submitted for review. This document is referenced in Tier 1 Groundwater Risk Assessment report GC22810_GWRA_T1 dated 12 April 2019 which states that *“Soil contamination assessment was carried out as part of a previous intrusive investigation carried out by Harrison Group Environmental Ltd with the detailed chemical analysis reports provided in the report reference: GC20560_SI dated May 2017”*

Once the above comment has been addressed we would ask to be reconsulted and we will provide our comments within 21 days.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

Direct e-mail Liam.Robson@environment-agency.gov.uk

Bradly Heffer
Mid Suffolk District Council
Planning Department
131, Council Offices High Street
Needham Market
Ipswich
IP6 8DL

Our ref: AE/2018/123343/01-L01
Your ref: DC/18/04247
Date: 05 October 2018

Dear Mr Heffer

**OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED)
ERECTION OF UP TO 300 DWELLINGS, CONSTRUCTION OF A NEW SPINE
ROAD, LAND FOR A NEW PRIMARY SCHOOL, BURIAL GROUND EXTENSION,
VILLAGE CAR PARK AND ASSOCIATED INFRASTRUCTURE.**

LAND OFF BURY ROAD THE STREET WOOLPIT IP30 9SA

Thank you for your consultation dated 28 September 2018. We have inspected the application, as submitted, and are raising a holding objection because the application has failed to provide assurance that the risks of pollution to controlled waters are acceptable, or can be appropriately managed. Our objection specifically relates to the burial ground extension.

Groundwater and Contaminated Land

The site is directly underlain by superficial quaternary deposits which consist of Lowestoft Till and Croxton Sands. These superficial deposits are heterogeneous in nature, and it is likely that they vary across the site. Beneath this is solid geology of cretaceous chalk and Crag Sands, both designated as a principal aquifer. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Both of these aquifers are situated within the WFD Cam and Ely Ouse Chalk groundwater body. The overlying soils at the site are classified as having a high leaching potential, meaning they can readily transmit a wide variety of pollutants to the groundwater. The site is partially located within a groundwater source protection zone (SPZ3), and the site is surrounded by primary, secondary and tertiary designated rivers.

The site is considered to be of high sensitivity and could present potential pollutant/contaminant linkages to controlled waters.

Reason

Controlled waters are particularly sensitive in this location because the proposed cemetery extension is located upon a principal aquifer which is associated with a groundwater abstraction for public water supply (SPZ3). The application has not submitted a preliminary risk assessment that assesses the risk of contamination to controlled waters.

At present the planning application is not supported by an appropriate assessment of risk so does not meet the requirements as set out in paragraphs 170 and 178 of the National Planning Policy and The Environment Agency's approach to groundwater protection document (March 2017) available at:

<https://www.gov.uk/government/collections/groundwater-protection>.

Overcoming Our Objection

An appropriate risk assessment is required to determine the potential pollution risks to controlled waters from the proposed cemetery development as well as the existing cemetery. The planning application for this site requires, as a minimum, a tier 1 risk assessment. The results of a tier 1 assessment should determine if further study into the area and/or precautionary measures will be necessary. The requirements of this tier 1 assessment, essentially a desk top study, are detailed on our website:

<https://www.gov.uk/government/collections/groundwater-protection>. Please also refer to the guidance listed in Appendix 1.

Subject to the outcomes of the tier 1 risk assessment and should the development be deemed acceptable, it would be beneficial to install water quality monitoring wells that are located upgradient and downgradient of the burial sites. These would provide valuable information on contaminant loading which can inform further detailed risk assessments.

We recommend specifying the number of burials per annum as this information is currently absent for the proposed extension and is needed to support any risk assessment going forwards.

The applicant should provide a Preliminary Risk Assessment (PRA), including a Desk Study, Conceptual Site Model and initial assessment of risk, to satisfactorily demonstrate that the risk to controlled waters from contamination has been fully understood and can be addressed through appropriate measures.

The site investigation submitted in support of this application has only focused on geotechnical information. It is useful because some information regarding the geology on site can be extrapolated, but it does not constitute a preliminary risk assessment with regards to contamination. The geotechnical site investigation demonstrates a good frequency of boreholes and trial pits, and we hope that samples we undertaken during this investigation. If this investigation was not

undertaken for dual purposes then we would expect a site investigation for land quality to exhibit the same frequency.

We ask to be re-consulted on this application once a PRA has been submitted and we will provide our bespoke comments within 21 days.

We trust this information is useful.

Yours sincerely

Miss Charlie Christensen
Planning Adviser

Direct dial 02084 745593

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

APPENDIX 1 – Advice to Applicant

We consider any infiltration Sustainable Drainage System (SuDS) greater than 2.0 metres (m) below ground level to be a deep system and are generally not acceptable. All infiltration SuDS require a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria in our Groundwater Protection: Principles and Practice (GP3) position statements G1 to G13. In addition, they must not be constructed in ground affected by contamination.

We recommend that developers should:

1. Refer to our “The Environment Agency’s approach to groundwater protection”, formerly “Groundwater Protection: Principles and Practice (GP3)”:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/620438/LIT_7660.pdf
2. The risk management framework provided in CLR11, “Model Procedures for the Management of Land Contamination”, when dealing with land affected by contamination:
<http://webarchive.nationalarchives.gov.uk/20140328084622/http://publications.environment-agency.gov.uk/pdf/SCHO0804BIBR-e-e.pdf>;
3. Our “Guiding Principles for Land Contamination” for the type of information that we require in order to assess risks to controlled waters from the site:
<http://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/192-guiding-principles-for-land-contamination-gplc>.
The Local Authority can advise on risk to other receptors, for example human health);
4. Our “Verification of Remediation of Land Contamination” report: <http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0210brxf-e-e.pdf>;
5. The CL:AIRE “Definition of Waste: Development Industry Code of Practice” (version 2) and our related “Position Statement on the Definition of Waste: Development Industry Code of Practice”:
<http://www.claire.co.uk/component/phocadownload/category/8-initiatives?download=212:definition-of-waste-development-industry-code-of-practice> and
http://www.claire.co.uk/index.php?option=com_phocadownload&view=category&download=178:dow-cop-ea-position-statement&id=8:initiatives&start=20&Itemid=230;
6. British Standards BS 5930:2015 and BS10175:2011 and our “Technical Aspects of Site Investigations” Technical Reports P5-065/TR:
<http://webarchive.nationalarchives.gov.uk/20140328084622/http://publications.environment-agency.gov.uk/pdf/SP5-065-TR-e-e.pdf> and
<http://webarchive.nationalarchives.gov.uk/20140328084622/http://publications.environment-agency.gov.uk/pdf/SP5-065-TR1-e-e.pdf>;

7. Our “Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination” National Groundwater & Contaminated Land Centre Project NC/99/73:
<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0202bisw-e-e.pdf>;
8. Our “Good Practice for Decommissioning Boreholes and Wells”:
<http://stuartgroup.ltd.uk/downloads/wellservices/groundwater/boreholedecommissioning/EAGuidelines.pdf>;
9. Our website: <https://www.gov.uk/government/organisations/environment-agency> for more information.



Bradly Heffer
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2018/123343/03-L01
Your ref: DC/18/04247
Date: 13 August 2019

Dear Mr Heffer

OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED) ERECTION OF UP TO 300 DWELLINGS, CONSTRUCTION OF A NEW SPINE ROAD, LAND FOR A NEW PRIMARY SCHOOL, BURIAL GROUND EXTENSION, VILLAGE CAR PARK AND ASSOCIATED INFRASTRUCTURE.

LAND OFF BURY ROAD, THE STREET, WOOLPIT, IP30 9SA

Thank you for your reconsultation dated 24 July 2019. We have reviewed the application as submitted and are maintaining our holding objection pending the submission and review of additional information. Further advice can be found within the Groundwater and Contaminated Land section below.

Groundwater and Contaminated Land

We have reviewed the following document that has been submitted in support of this application:

- HGE (July 2019). Tier 1 Groundwater Risk Assessment Supplementary Report Ref: GC22810-GWRA-T1-SupG1

We acknowledge that supplementary intrusive investigations have proved heterogeneous but generally clayey superficial strata to a depth of 4mbgl on the burial site. In combination with the results from soakaway tests carried out previously, and taking into account our revised estimate that the peak seasonal depth to groundwater is likely to be around 8mbgl, we are minded to agree that the risk to controlled waters is acceptable.

Notwithstanding the above, we are still awaiting confirmation regarding the locations of any private or domestic groundwater abstractions in the vicinity of the site, details of any investigations into historical ASTs on the southern edge of the site, and submission of HGE Report GC20560_SI dated May 2017 - as requested in our previous response.

Overcoming our objection

At this stage we are unable to waive our previous objection for development of the site

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Iceni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

as a cemetery extension. Further information is required as outlined below:

- The locations of private water supplies proximal to the extension site should be confirmed. This will require an approach to the Local Authority for Private Water Supply records.
- Details of any investigations undertaken to assess potential contamination relating to historical ASTs on the southern edge of the cemetery site.
- HGE Report GC20560-SI should be submitted for review.

Once the above comments have been addressed we would ask to be reconsulted and we will provide you a response within 21 days.

Advice to LPA / Applicant

Regardless of the above we advise that the site must meet the minimum groundwater protection requirements as per the current groundwater protection guidance available on gov.uk. The minimum groundwater protection guidance states that all burials should be:

- Outside a [source protection zone 1](#) (SPZ1)
- At least 250 metres from any well, borehole or spring supplying water for human consumption or used in food production – for example at farm dairies
- At least 30 metres from any spring or watercourse not used for human consumption or not used in food production
- At least 10 metres from any field drain, including dry ditches
-

In addition, all graves must:

- Have at least 1 metre clearance between the base of the grave and the top of the water table
- Not have standing water in them when dug
- Not be dug in unaltered or unweathered bedrock
- Not be dug in areas susceptible to groundwater flooding
- Be deep enough so at least 1 metre of soil will cover the top of the coffin, body or animal carcass Please note that current guidance on risk assessments and groundwater protection requirements is available online:
<https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments>
<https://www.gov.uk/guidance/cemeteries-and-burials-prevent-groundwater-pollution>

We trust this advice is useful.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

Direct e-mail Liam.Robson@environment-agency.gov.uk

End



Bradly Heffer
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2018/123343/02-L01
Your ref: DC/18/04247
Date: 17 June 2019

Dear Mr Heffer

OUTLINE PLANNING APPLICATION (ACCESS TO BE CONSIDERED) ERECTION OF UP TO 300 DWELLINGS, CONSTRUCTION OF A NEW SPINE ROAD, LAND FOR A NEW PRIMARY SCHOOL, BURIAL GROUND EXTENSION, VILLAGE CAR PARK AND ASSOCIATED INFRASTRUCTURE.

LAND OFF BURY ROAD, THE STREET, WOOLPIT, IP30 9SA

Thank you for your re-consultation dated 31 May 2019. We have reviewed the application as submitted, including the HGE Tier 1 Groundwater Risk Assessment referenced GC22810-GWRA-T1 and dated April 2019, and are maintaining our holding objection. Further information can be found within the Groundwater and Contaminated Land section below.

Groundwater and Contaminated Land

We maintain our holding objection to the development as proposed, and the proposed cemetery development in particular, because the application has failed to sufficiently characterise the potential risks to controlled waters, or demonstrate that these risks can be appropriately managed. Further information is required as detailed below to allow us to remove our holding objection.

The tier 1 report notes that the nearest recorded groundwater abstraction license for potable water is located 902 m from the cemetery extension site and is designated as being inactive. It should be confirmed whether the underlying license search included an approach to the Local District Council, who may hold details of private domestic sources on register as required by the Private Water Supplies Regulations 1991. Our records show that a number of groundwater abstractions for agriculture and domestic uses were previously present in the vicinity, some of which were identified within the tier 1 report.

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www.gov.uk/environment-agency

Cont/d..

However, certain water supplies do not require a licence from us and therefore may not be known to us, and our records of such abstractions may not be up-to-date.

The appraisal of superficial cover for the T1 risk assessment is not conservative. The assessment assumes >5 m of Lowestoft Fm strata at the site, whilst on-site pits (SA07, SA08) proved only 1.5 m of Lowestoft Fm. We note that whilst BGS database boreholes TL96SE111, TL96SE112 and TL96SE113 (located to the south and west of the site) and HGE borehole BH02 (located to the north of the site) proved >15.2 m of Lowestoft Fm, HGE borehole WS117 (located closer to the site) proved <1 m of Lowestoft Fm, in this case overlying Croxton Fm (based on the log for DCS117 presented in HGE report *GC20560_Sup* dated June 2018). The thickness of Lowestoft Fm therefore varies markedly in the vicinity of the extension site. A more conservative risk appraisal would assume thin or patchy Lowestoft Fm at the site, with more permeable strata (Croxton Fm or Crag Gp) present at shallow depths.

The appraisal of depth to water table for the T1 risk assessment is not conservative. The assessment assumes that the bedrock water table beneath the extension site is at a depth of 10 mbgl (based upon initial groundwater strike at the Lowestoft/Crag interface in BH01 located 500 m to the north) despite the shallower 8 mbgl rest water level that was subsequently recorded. We suggest that 8 mbgl relates to the potentiometric surface of groundwater in the Crag aquifer (which is probably confined or semi-confined at this location) and would be applicable as a depth-to-groundwater estimate if this aquifer were unconfined (overlain directly by Croxton Fm, for example).

We note also that it is unclear whether the depth-to-groundwater estimate from BH01 has been corrected for ground level elevation differences when applied to the extension site. Our groundwater level observation borehole (ref: TL96/006) indicates that the peak seasonal groundwater level in the vicinity of the site may be as high as 61 m AOD. We note from the T1 report and the previously submitted site investigation report (HGE *GC20569_SUP 1* dated June 2018) that perched groundwaters were encountered at depths between 0.42 mbgl and 2.35 mbgl across the broader development site, and that widespread waterlogging of the ground surface was observed. The likelihood of perched groundwater conditions occurring on the site and the associated implications for groundwater protection should be considered for the proposed burials within the proposed cemetery extension site.

The T1 report notes that unbunded ASTs may have been present on the southern edge of the cemetery extension site. Please advise whether any intrusive investigations been undertaken to assess potential contamination relating to these sources, and consider the implications for the proposed development site. The T1 assessment report references a previous site investigation report with soil analyses (HGE Report *GC20560_SI* dated May 2017) which may contain relevant data. However this report has not been submitted for review.

Overcoming our objection

At this stage we are unable to waive our previous objection for development of the site as a cemetery extension. Further information is required as outlined below:

- The thickness and character of superficial cover at the extension site should be established; further intrusive investigations may be required.
- The depth to bedrock groundwater at the extension site should be established and estimates of seasonal variations in groundwater levels should be provided.
- The locations of private water supplies proximal to the extension site should be confirmed, and Local Authority Private Water Supply records should be queried.
- Details of how the likely burial rate was estimated should be provided.

- Details of any investigations undertaken to assess potential contamination relating to historical ASTs and other miscellaneous activities at the extension site should be provided.
- HGE Report GC20560-SI should be submitted for review.

Once the above comments have been addressed, we would ask to be re-consulted and will provide comments within 21 days.

Advice to LPA / Applicant

Regardless of the above we advise that the site must meet the minimum groundwater protection requirements as per the current groundwater protection guidance available on gov.uk. The minimum groundwater protection guidance states that all burials should be:

- Outside a [source protection zone 1](#) (SPZ1)
- At least 250 metres from any well, borehole or spring supplying water for human consumption or used in food production – for example at farm dairies
- At least 30 metres from any spring or watercourse not used for human consumption or not used in food production
- At least 10 metres from any field drain, including dry ditches

In addition, all graves must:

- Have at least 1 metre clearance between the base of the grave and the top of the water table
- Not have standing water in them when dug
- Not be dug in unaltered or unweathered bedrock
- Not be dug in areas susceptible to groundwater flooding
- Be deep enough so at least 1 metre of soil will cover the top of the coffin, body or animal carcass

Please note that current guidance on risk assessments and groundwater protection requirements is available online: <https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments>

<https://www.gov.uk/guidance/cemeteries-and-burials-prevent-groundwater-pollution>

We trust this advice is useful.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

Direct e-mail Liam.Robson@environment-agency.gov.uk

cc Bidwells Property Consultants

From: Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 03 October 2018 15:09
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: Re: DC/18/04247

Dear Mr Heffer

Application ref: DC/18/04247
Our ref: 260235

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 sincerely

Joanne Widgery
Natural England
Consultations Team
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: 0300 060 3900
Email: www.gov.uk/natural-england



Historic England

Mr Bradley Heffer
Mid Suffolk District Council
Planning Control Dept
Endevour House
Russell Road
Ipswich IP1 2BX

Direct Dial: 01223 582751

Our ref: P00972487

08 October 2018

Dear Mr Heffer

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP
(Development Management Procedure) (England) Order 2015**

**LAND OFF BURY ROAD, WOOLPIT, SUFFOLK, IP30 9SA
Application No 18/4247**

Thank you for your letter of 28th September 2018 notifying Historic England of the above applications

Summary

The applications comprise the Outline permission for the development up to 300 dwellings, construction of a new spine road and land for new school burial ground and car park. The applicant has identified harm to the historic significance of the conservation area and grade I listed parish church resulting from the development.

Historic England Advice

The Lady's Well scheduled monument is to the south east of the application site and comprises an irregular, partially water-filled, moat surrounding a moderate sized moat island. The site is unoccupied and the current land-use is given over to scrub vegetation and trees. A spring is located at the base of the southern arm where a brick chamber has been constructed around the spring head and is thought to be the site of the 'holy well'. The scheduled monument is also associated with the possible site of a medieval chapel, thought to be on or close to the moated site. The scheduled monument contains good evidential information for its historic nature and extent, including the earthworks of the moat and a good potential for buried archaeology within the island and palaeoenvironmental deposits within the moat. The spring and spring head provide added physical interest. Together with the local



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historical interest, the monument's significance is also enhanced by strong communal values linked to the holy well, the (possible) chapel and local folklore.

The setting of the scheduled monument is an important aspect of how the site is understood and positive elements of this setting contribute to the monument's significance. This includes its visual context, its association with other assets (such as the nearby grade I listed church) and its relationship with the wider historic landscape. The immediate surroundings of the monument are particularly important. The moat has historically been situated in a relatively isolated location away from the main focus of settlement, surrounded by a largely undeveloped, rural and agricultural landscape. This landscape has been eroded in the latter part of the 20th century and the undeveloped elements of the monument's setting are now only preserved in the open fields to the south, east and west including the application site. These areas reflect the essential character of the monument's original surroundings and allow it to be experienced in something close to its original context making them positive elements of its setting. As development proceeds around Woolpit the remaining open fields become increasingly important as parts of the monument's setting.

The application site also provides historic context and forms an important element within the setting of the grade I listed church of St Mary. The church is situated on a historical route into the village; with important views of the church tower and spire from the north. The earliest fabric dates from the 13th and 14th centuries but much of its external grandeur comes from the fine 15th century clerestory and impressive Victorian spire, built in the 1850s by noted architect RM Phipson in the style of the 14th century. Spires are a rarity in this part of East Anglia and this fine example makes an imposing building the dominant built feature in the landscape on the east and northern sides of the village and is visible in long views from a number of locations when approaching the settlement. The spire enhances the church's prominence in the settlement and landscape and highlights how it was designed to be experienced as a landmark within the wider landscape setting. There is also intervisibility between St Mary's and the tower of Elmswell church when seen from fields to the north of Woolpit, further emphasising the historic status of these buildings and illustrating the networks of community and faith in Medieval England.

The application site also contributes to the character of the conservation area. The density of buildings decreases on the northern side of the settlement and although some scattered development lies between the historic core and the application site the site is still recognisable as the outer edge of the village where it joins open countryside. This junction with the edge of the conservation area is important in establishing the character of the conservation area at this historic interface with surrounding countryside.

The scheduled monument would remain separated from the new development by the existing playing fields but when approaching from the north the presence of new development to the west is likely to be apparent. The effect on the conservation area and views of the church spire would be more pronounced. The Built Heritage Statement submitted with the application has provided a detailed assessment of the significance of the designated heritage assets affected by the proposed



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development, including a consideration of setting and the contribution it makes to the significance of these assets.

In paragraph 7.12 it notes how the proposed development 'will result in a reduction of total views of the church tower across the entire site' and concludes that this would cause 'less than substantial harm' to the historic significance of the grade I listed building (paragraph 7.13). The Statement (paragraph 7.8) also accepts that the historic significance of the conservation area will be harmed by the development of the fields to its north. Here it is suggested that planting along the northern boundary of the conservation area will 'visually screen part of this new development to the north west of the conservation area' (paragraph 7.7) but this will not remove the fact that an area which contributes to the significance of the conservation area by being undeveloped green space would be built upon. A more meaningful statement is that 'a reduction in the built form... towards the south-eastern area of the site will help to preserve more sensitive areas where views of the church can include elements of the upper clerestory' (paragraph 7.11). We would agree with this and suggest that it would also benefit the northern edge of the conservation area.

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

We have considered this application in terms of this policy and are concerned that development of the application site would result in harm to significance of the listed building and not preserve those elements of setting that make a positive contribution to the heritage asset and better reveal its significance in terms of the NPPF, paragraphs 193 and 200. As such it would not achieve the NPPF's overarching aim of promoting sustainable development. Paragraph 196 requires the Council to consider any public benefit which might be delivered by the proposals and weigh this against the harmful impact. We leave this matter to the Council but agree with the applicant's suggestion that a reduction in the 'built form' of the south eastern area of the site would help to preserve views of the church and the edge of the conservation area. Removing some of the housing proposed to be immediately south of the proposed primary school and increasing the area of open land could create a corridor of open space to better preserve views of the spire, the character of open land at this edge of the conservation area and west of the scheduled monument and potentially preserve an area from which the inter-visibility between Woolpit and



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Elmswell churches can be appreciated. This reduction in harmful impact would allow the bulk of the development to proceed and so deliver the public benefit in a way that better accords with the overarching aim of the NPPF and planning system to produce sustainable development. We would therefore recommend the Council consider amending the scheme before weighing the benefit against harm to the historic environment and determining the application.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We are concerned by the harmful impact on the grade I listed church and conservation area the applicant has identified but consider amendment of the scheme could reduce this significantly.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 7, 8, 193 and 194 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



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



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Your Ref:DC/18/04247
Our Ref: SCC/CON/3941/18
Date: 24 October 2019
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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: Bradly Heffer

Dear Bradly

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION REF: DC/18/04247

PROPOSAL: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure

LOCATION: Land off Bury Road The Street Woolpit Bury St. Edmunds IP30 9SA

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

COMMENTS

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

- The location of the development is adjacent to J47 of the A14 with a proposal to create safe links to the development and will be beneficial to the existing highway network. this proposal is designed with an access strategy in order to reduce the impact on the A14/A1088 interchange and the new site access junction with The Street.
- Pedestrian and cycle links to sustainable modes of transport such as bus stops and rail station are being promoted.
- The proposal is to extend the 30mph speed limit and 7.5t weight limit to include the site and proposed roundabout at the A14 interchange.
- The estimated total additional vehicle trips in the AM peak hour is 299 vehicles (average 5 vehicle every minute the additional vehicles from the development will not have a severe impact on the surrounding road and junctions.
- There is one slight injury accident recorded in Woolpit village and fourteen on the A14 junction. It is considered the introduction of the roundabout on the A1088 will reduce the risk off accidents at this location.
- The proposed footway and cycle links improves access to village amenities for cyclists and pedestrians.

- SCC to consider it necessary to create a footway/cycle link between Woolpit and Elmswell. This scheme will be a sustainable solution as outlined in the NPPF and Mid Suffolk Core Strategies S03 and S06. Part of this proposal is to be delivered by the developer either by condition or S106 contribution.
- Further to the above, we have asked for a signing strategy to be designed to ensure clear and concise signage for HGVs and general access into the village is introduced for the area.

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

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:

ER1 - Condition: Before the development is commenced, details of the roundabouts, 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.

ER2 - 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.

FW - Condition: Before any dwelling is first occupied, details of the shared cycle link from the site to A1088 roundabout with Church Road, Elmswell (including layout, levels, gradients), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that suitable footways are provided to access the application site and to connect the sites with adjacent footways and bus stops.

V1 - Condition: The new estate road roundabouts with the A1088 and The Street, inclusive of cleared land within the sight splays to these junctions, must be formed prior to any other works commencing or delivery of any other materials.

Reason: To ensure the safe access to the site is provided before other works commence in the interest of highway safety.

P2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety and to ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and the National Planning Policy Framework.

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.

D2 - Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

B2 - Condition: Before the development is commenced details of the areas to be provided for storage 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 on the highway causing obstruction and dangers for other users.

TP1 - Condition: No development above ground floor slab level of any part of the development hereby permitted shall take place until the travel arrangements to and from the site for residents of the dwellings, in the form of a Travel Plan in accordance with the mitigation measures identified in the submitted Interim Residential Travel Plan and Transport Assessments (both dated July 2018) shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority. This Travel Plan must contain the following:

- Baseline travel data based upon the information provided in the Transport Assessment, with suitable measures, objectives and targets identified targets to reduce the vehicular trips made by residents across the whole development, with suitable remedial measures identified to be implemented if these objectives and targets are not met
- Appointment of a suitably qualified Travel Plan Coordinator to implement the Travel Plan in full and clearly identify their contact details in the Travel Plan
- A commitment to monitor the vehicular trips generated by the residents and submit a revised (or Full) Travel Plan on occupation of the 100th dwelling
- A further commitment to monitor the Travel Plan annually on each anniversary of the approval of the Full Travel Plan and provide the outcome in a revised Travel Plan to be submitted to and approved in writing by the Local Planning Authority until five years has passed after occupation of the final dwelling using the same methodology as the baseline monitoring
- A suitable marketing strategy to ensure that all residents on the site are engaged in the Travel Plan process
- A Travel Plan budget that covers the full implementation of the Travel Plan
- A copy of a residents travel pack that includes a multi-modal voucher to incentivise residents to use sustainable travel in the local area
- No dwelling within the site shall be occupied until the Travel Plan has been agreed. The approved Travel Plan measures shall be implemented in accordance with a timetable that shall be included in the Travel Plan and shall thereafter adhered to in accordance with the approved Travel Plan.

Reason: In the interest of sustainable development as set out in the NPPF, and policies SO3 and S06 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

TP2 - Condition: Within one month of first occupation, each resident shall be provided with a Travel Information Pack that contains the sustainable transport information and measures to encourage the use of sustainable transport. Not less than 3 months prior to the occupation, a completed Travel Information Pack shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include up-to-date walking, cycling and bus maps, relevant bus and rail timetable information, car sharing information, sustainable transport discounts and a multi-modal voucher. The Travel Information Pack shall be maintained and operated thereafter.

Reason: In the interests of sustainable development as set out in the NPPF, and policies SO3 and S06 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

Note: The Resident Travel Pack should be produced in accordance with Suffolk County Council's Travel Plan Guidance - see the following link for further information:

(www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/information-for-developers)

TP3 - Condition: Prior to first occupation of the school a Travel Plan must be submitted and approved in writing by the Local Planning Authority in accordance with Suffolk County Council's published School Travel Plan requirements. The Travel Plan must include the following:

- a commitment to undertake a survey for travel to and from the site for employees, pupils and visitors within six months of occupation;
- targets for the shift of transport modes into sustainable modes, for all users of the site, with an aspiration to achieve a Modeshift STARS Bronze accreditation;
- proposals for rectifying failures to meet modal shift targets for a period of five years following the occupation of the building;
- the proposed arrangements for the monitoring of the Travel Plan for a minimum period of five years. The Travel Plan shall be kept up to date through regular review and shall be available for examination by the Local Planning Authority at any time.

Reason: In the interest of sustainable development as set out in the NPPF, and policies SO3 and S06 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

NOTES

The Travel Plan and Resident Travel Pack should be produced in accordance with Suffolk County Council's Travel Plan Guidance (www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/information-for-developers)

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.

SECTION 106 CONTRIBUTIONS

Footway/Cycleway Mitigation Measures

If the developer does not wish to deliver the cycle link between the site and the A1088/Church Road Roundabout under s278 of the Highways Act, we require s106 contribution of £220,000 from the developer to allow SCC as the highway authority to deliver the scheme.

Travel Planning

To secure the Travel Plan, we would only require s106 contributions if the developer would be willing to pay SCC to deliver the Travel Plan on their behalf. We have calculated that it will cost approximately £77,300 (£257.67 per dwelling) to do this for them. This cost will include the designing and printing of travel packs, regular Local Links promotional information and monitoring using both ATC's and multi-modal counts over a period of nine years. This contribution will need to be payable at least six

months before first occupation and will also need to be index linked to ensure sufficient funds are provided to take into account future inflation.

Public Transport

There are bus stops that serve the community of Woolpit. The transport team would like the applicant to consider the option of the bus route diverting into the development and provide bus stops with shelters etc within the site. If the route does not divert, a contribution of approx. £15,000/per site is required to construct or improve bus stops nearby.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

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: Bradley Heffer

Dear Bradley

TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN:

PROPOSAL: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure

LOCATION: Land off Bury Road The Street Woolpit Bury St. Edmunds IP30 9SA

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

COMMENTS

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

- The location of the development is adjacent to J47 of the A14 with a proposal to create safe links to the development and will be beneficial to the existing highway network. this proposal is designed with an access strategy in order to reduce the impact on the A14/A1088 interchange and the new site access junction with The Street.
- Pedestrian and cycle links to sustainable modes of transport such as bus stops and rail station are being promoted.
- The proposal is to extend the 30mph speed limit and 7.5t weight limit to include the site and proposed roundabout at the A14 interchange.
- The estimated total additional vehicle trips in the AM peak hour is 299 vehicles (average 5 vehicle every minute the additional vehicles from the development will not have a severe impact on the surrounding road and junctions.
- There is one slight injury accident recorded in Woolpit village and fourteen on the A14 junction. It is considered the introduction of the roundabout on the A1088 will reduce the risk off accidents at this location.

- The proposed footway and cycle links improves access to village amenities for cyclists and pedestrians.
- SCC to consider it necessary to create a footway/cycle link between Woolpit and Elmswell. This scheme will be a sustainable solution as outlined in the NPPF and Mid Suffolk Core Strategies S03 and S06. We are working with the developer to bring part of this scheme to fruition.
- Further to the above, we have asked for a signing strategy to be designed to ensure clear and concise signage for HGVs and general access into the village is introduced for the area.

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

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:

Condition: Before the development is commenced, details of the roundabouts, 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.

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.

Condition: The new estate road roundabouts with the A1088 and The Street, inclusive of cleared land within the sight splays to these junctions, must be formed prior to any other works commencing or delivery of any other materials.

Reason: To ensure the safe access to the site is provided before other works commence in the interest of highway safety.

Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety and to ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and the National Planning Policy Framework.

Condition: All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV

Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

Condition: Within one month of first occupation, each resident shall be provided with a Travel Information Pack that contains the sustainable transport information and measures to encourage the use of sustainable transport. Not less than 3 months prior to the occupation, a completed Travel Information Pack shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include up-to-date walking, cycling and bus maps, relevant bus and rail timetable information, car sharing information, sustainable transport discounts and a multi-modal voucher. The Travel Information Pack shall be maintained and operated thereafter.

Reason: In the interests of sustainable development as set out in the NPPF, and policies SO3 and S06 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

Note: The Resident Travel Pack should be produced in accordance with Suffolk County Council's Travel Plan Guidance - see the following link for further information:

(www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/information-for-developers)

Condition: Prior to first occupation of the school a Travel Plan must be submitted and approved in writing by the Local Planning Authority in accordance with Suffolk County Council's published School Travel Plan requirements. The Travel Plan must include the following:

- a commitment to undertake a survey for travel to and from the site for employees, pupils and visitors within six months of occupation;
- targets for the shift of transport modes into sustainable modes, for all users of the site, with an aspiration to achieve a Modeshift STARS Bronze accreditation;
- proposals for rectifying failures to meet modal shift targets for a period of five years following the occupation of the building;
- the proposed arrangements for the monitoring of the Travel Plan for a minimum period of five years.

The Travel Plan shall be kept up to date through regular review and shall be available for examination by the Local Planning Authority at any time.

Reason: In the interest of sustainable development as set out in the NPPF, and policies SO3 and S06 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

Condition: Before the development is commenced details of the areas to be provided for storage 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 on the highway causing obstruction and dangers for other users.

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.

SECTION 106 CONTRIBUTIONS

The following requirements of the Travel Plan should be secured by Section 106 obligations or planning conditions to ensure it is implemented over the required timescale:

Implementation of the Interim Travel Plan (when approved)

Appointing and providing the contact details of the Travel Plan Coordinator to the Local Planning Authority and Highway Authority

Submission, approval and full implementation of a Full Travel Plan on occupation of the 100th dwelling

- Monitoring the Travel Plan for a minimum of five years after occupation of the 100th unit, or one year after occupation of the final dwelling, whichever is the longest duration
- Securing and implementing remedial Travel Plan measures if the agreed Travel Plan targets are not achieved

All the contributions and obligations have taken into account CIL regulation 122 and are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording for the proposed Section 106 obligations, or planning conditions can be supplied at a later date if planning permission is granted.

Further Travel Plan conditions or Section 106 obligations and contributions may be required if the applicant would like Suffolk County Council to design and produce the Travel Pack on their behalf, or if they require any additional help or support from the county council in regards to the Travel Plan process.

Public Transport

There are bus stops that serve the community of Woolpit. The transport team would like the applicant to consider the option of the bus route diverting into the development and provide bus stops with shelters etc within the site. If the route does not divert, a contribution of approx. £15,000/per site is required to construct or improve bus stops nearby.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your ref: 18/04247/OUT
Our ref: 00041035
Date: 21 October 2019
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

By e-mail only:

planningyellow@baberghmidsuffolk.gov.uk

FAO Bradly Heffer –
Principal Planning Officer

Dear Bradly,

Re: Woolpit, Land off Bury Road - Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

I refer to the following application for planning permission in Mid Suffolk. As my previous response was over six months old please treat this letter as an updated response.

Proposed number of dwellings from development:	Affordable units	Open market units	Total
	60	240	300

To aid simplicity, as Mid Suffolk's CIL covers libraries, waste and secondary school infrastructure, these have been removed from this letter but the County Council would make a future bid for CIL funding of **£64,800** towards libraries provision, **£33,000** to waste provision, **£1,091,424** to secondary provision, and **£227,380** to sixth form provision.

I set out below Suffolk County Council's views, which provides our infrastructure requirements for primary and early years associated with this proposal Council.

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 local catchment schools are Woolpit Primary Academy and Thurston Community College.

School level	Minimum pupil yield:	Required:	Developer Contribution mechanism:
Primary school age range, 5-11:	69	25 ¹	S106
Secondary school age range, 11-16:	48	48	CIL
Secondary school age range, 16+:	10	10	CIL

Primary School

In line with the Department for Education’s recent guidance; [Securing developer contributions for education](#), the County Council is seeking a range of options to mitigating the growth in the vicinity by ensuring there are enough primary places available. There are a range of options in ensuring sustainable primary provision in Woolpit by:

- a) Expanding the existing school;
- b) Retaining the current primary school, as well as delivering a second (new) primary school in Woolpit.

This letter sets a flexible approach to ensuring there will be early years and primary places available in line with local and national planning policy including regulation 122 of the CIL regs.

Two major residential applications secured planning permission in 2018 in the catchment – 2112/16 (land on East Side of Green Road) and 1636/16 (Land south of Old Stowmarket Road). Two applications were refused planning

¹ Credit applied as explained on page 3.

permission – 17/02767 (Land South of Rags Lane) and 4489/16 (Land North of Old Stowmarket Road).

SCC forecasts show that there will not be enough surplus places available at the catchment primary school to accommodate all of the pupils anticipated to arise should the undetermined applications be approved and built out. How the forecasted 50 surplus pupil places are distributed between the two applications is for the District to determine but a suggested approach based on the percentage of pupils arising is recommended as follows:

The two undetermined applications in Woolpit including this application (18/04247) along with 19/02656. They total 340 dwellings collectively which give rise to 78 primary pupils in total. This scheme generates 69 pupils which equates to 88% of the total pupils arising. Therefore 88% of the 69 pupils arising from this scheme accounts for 44 of the 50 surplus places available. This crediting of surplus pupil places is only applicable when dealing with S106 contributions.

In addition the emerging Local Plan proposes a further 200 houses as a latter phase to this development as well as another 50 dwellings on two different sites in the village. Children arising from additional growth in Elmswell are also unlikely to be able to find places at Elmswell Primary School.

A feasibility study previously confirmed that Woolpit Primary Academy cannot be expanded within its current site. A second feasibility study has confirmed how the school could expand if additional land was secured outside of the school's site. An expansion project will be significantly more expensive compared to local and national benchmark expansion costs and there will also need to be further assessment on the highway impacts if the school was to expand and foul and surface water connections. Therefore at this point in time it has not been confirmed that the school will be able to expand.

Due to the level of development proposed in Woolpit and Elmswell it is unlikely that the existing Woolpit Primary Academy could provide enough places even when taking into account the expansion of Elmswell Primary School. Therefore the education strategy is to secure a land option for a new primary school, as well as securing a land option for the existing primary school. This accords with recent the DfE guidance, which states at paragraph 17; "...we recommend that you identify a preferred and 'contingency' school expansion project in a planning obligation, as long as both would comply with the Section 106 tests. This will help you *respond to changing circumstances and new information, such as detailed feasibility work leading you to abandon a preferred expansion project*".

Proportionate land and build costs towards a new school will be secured by section 106 contributions.

The recent DfE guidance advises in paragraph 15 that costs of mainstream school places be based on “national average costs published annually in the DfE school place scorecards”, to differentiate between the average per pupil cost of a new school, permanent expansion or temporary expansion, and that this average should be adjusted using BCIS location factors². The most recent scorecard is 2018 and the national average new build cost per pupil for primary schools is £19,611. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national new build cost (£19,611 x 1.00) produces a total of £19,611 per pupil for new build primary schools.

A proportionate developer contribution, based on the primary age pupils requiring funding from the proposed development is calculated as follows:

- 2.2 ha of land
- £19,611 per pupil place
- From 300 dwellings based on the mix and surplus places it is calculated that 25 primary age pupils will arise;
- Therefore 25 pupils x £19,611 per place = **£490,275 (2019/20 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £543,620 for a 2.2 hectare site and equates to £1,294 per pupil place. For the proposed development, this equates to a proportionate land contribution of 25 places x £1,294 per place = £32,350.

*Total primary school s106 contribution - £490,275 + £32,350 = **£522,625***

*£522,625 / 300 Dwellings = **£1,742 per dwelling***

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

The number of 2 – 4 years olds children is 0.15 / dwelling. This figure then needs

² [DfE Securing developer contributions for education](#)

further consideration for the different age breakdowns to take into account the number of two year olds eligible for 15 hours of free early years provision, the three and four year olds securing 15 hours (universal entitlement), and the number of three and four year olds securing the additional 15 hours (extended entitlement). The DfE has identified that 51% of three and four years olds in Suffolk are eligible for 30 hours of funded childcare from September 2017. The number of places required can then be calculated as 0.09 / dwelling.

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”. Therefore the cost of £19,611 per place will be used in calculations.

The most practical approach is to establish a new early education setting on the site of the new primary school which is likely to be a 90 place setting.

The Mid Suffolk District Council CIL position Statement states that new early education settings are not identified for funding through CIL so this would be secured through a s106 contribution.

	Minimum number of places arising:	Places required:	Proportionate cost per place £:
Pre-School age range, 2-4:	27	27	19,611

Total s106 early years contribution:

£529,497

3. **Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.
4. **Monitoring fee.** The new CIL Regs allow for the charging of monitoring fees. In this respect the county council charges £500 for each trigger point in a planning obligation. The monitoring charge will be payable on commencement of the development.
5. **Time Limits.** The above information is time-limited for 6 months only from the date of this letter.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer

Planning Section, Strategic Development, Resource Management Directorate

cc Joanne Fellowes - SCC
Sam Harvey – SCC
Chairman – Woolpit Parish Council
Cllr Jane Storey - SCC

Your ref: 18/04247/OUT
Our ref: 00041035
Date: 18 October 2018
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Bradley Heffer
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich, Suffolk,
IP1 2BX

Dear Bradley,

Re: Woolpit, Land off Bury Road - Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

I refer to the above application for planning permission in Mid Suffolk.

Proposed number of dwellings from development:	1 bedroom apartments	2 bedroom+ Houses/apartments	Total
	26	274	300

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this proposal Council.

Paragraph 56 of the National Planning Policy Framework (NPPF) 2018 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.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 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

As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. The requirements being sought here have been identified by developer funding (CIL / S106). It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

Infrastructure mitigation is split between planning obligations and CIL.

The details of specific contribution requirements related to the proposed scheme are set out below:

- 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 local catchment schools are Woolpit Primary Academy and Thurston Community College.

School level	Minimum pupil yield:	Required:	Developer Contribution mechanism:
Primary school age range, 5-11:	69	69	S106
Secondary school age range, 11-16:	54	54	CIL
Secondary school age range, 16+:	12	12	CIL

Primary School

When taking into account recent planning permissions, our forecasts identify that there are no surplus places at the catchment Primary School to accommodate the children arising from this scheme. A feasibility study has confirmed that the existing school cannot be expanded within its current site. A development of 300 dwellings in combination with extant planning permissions and other development proposals coming through the emerging local plan it is sufficient to justify a new primary school which has been the emerging education strategy put forward to date.

In addition because Woolpit and Elmswell share services, future growth in these villages could be well served by a new school located on this site. Work has also previously been undertaken to assess the possibility of delivering a footway/cycleway between the two villages and this is something SCC is raising through the emerging Local Plan.

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

out for planning permissions 2112/16 and 1636/16 with the former being allowed at appeal where it was confirmed by the inspector that the early years and primary education contributions are for new provision i.e. types of infrastructure not identified on the District's CIL 123 List. This appeal decision reinforces that the County Council is not 'double dipping' in respect of the infrastructure contributions being sought.

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

- a) Retain a single primary school for the Woolpit by relocating and delivering a new larger school; or,
- b) Retain the current primary school and deliver a second (new) primary school in Woolpit.

This site is providing a new school site. A new school will need a site of a minimum size of 3 hectares. The site will be big enough to allow for futureproofing should the school need to expand further. A new 420 place primary school is currently estimated to cost at least £7.1m to build (excluding land costs).

The [Developers Guide to Infrastructure Contributions in Suffolk](#) (topic paper four) states that a site provided for a new school:

"...must be rectangular in shape, on level ground and located on a gyratory road (i.e. not in a cul-de-sac) near to the centre of the development and close to other community facilities. The site must be free of contamination and cleared of any previous land use especially if the site was once industrial land. The developer will also provide services to the appropriate boundary of the site, including adequate access by motor vehicle and on foot, ICT connections, gas, electric and water supplies plus outlet to the local sewer system".

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a S106 planning obligation. This is on the basis that the Mid Suffolk CIL Regulation 123 List does not include funding for new primary schools. A proportionate developer contribution, based on the primary age pupils requiring funding from the proposed development is calculated as follows:

- £7.1m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £7.1m/420 places = £16,904 per place.
- £16,904 per pupil place
- From 300 dwellings based on the mix it is calculated that 69 primary age pupils will arise

- Therefore 69 pupils x £16,904 per place = **£1,166,376 (2018/19 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £741,316 for a 3 hectare site and equates to £1,765 per pupil place. For the proposed development, this equates to a proportionate land contribution of 69 places x £1,765 per place = **£121,785.**

*Total primary school s106 contribution - £1,267,800 + £132,375 =
£1,288,161*

*£1,288,161 / 300 Dwellings = **£4,294 per dwelling***

As this site is providing a school site, the above land contribution will be deducted off the price paid for the land (@ £100,000 per acre).

Should expansion at the existing school be confirmed, the obligation will cease but the need for the education land will still be necessary to deliver a new school to cater for future growth in this area.

Secondary School

The catchment secondary school is Thurston Community College. This school will not have sufficient spare places to absorb the additional secondary and Sixth Form pupils derived from all of the significant new housing numbers coming forward in the surrounding areas. It is likely expansion will be required which would fall under CIL.

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

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

The Developers Guide to Infrastructure Contributions in Suffolk (topic paper three) sets out; “where a development proposal is anticipated to create over 20 FTE ‘places’, then a new provision will be sought”. In the IP11 9 area, there are no available places. From a development of 300 dwellings, the County Council anticipates 36 pre-school places will arise.

Given the scale of development proposed in the area, the recent legislative changes and the intention to establish a new primary school, the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 90 place setting. Our latest size and costs are 1292.7 sqm of land and £15,983 per place. The land requirement is incorporated into the new school site.

The Mid Suffolk District Council Regulation 123 List states that new early education settings are not identified for funding through CIL so this would be secure through a s106 contribution.

	Minimum number of places arising:	Places required:
Pre-School age range, 2-4:	36	36

Total s106 early years contribution:

£575,388

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 further key document is the ‘Quality in Play’ document fifth edition published in 2016 by Play England.
4. **Transport issues.** The NPPF at Section 9 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be co-ordinated by Sam Harvey of Transport Strategy, Strategic Development, SCC.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002). The guidance can be viewed at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/2015-11-16-FINAL-2015-Updated-Suffolk-Guidance-for-Parking.pdf>

Offsite new bus stops are considered to be CIL funded. A request for the necessary improvements will be applied for at the relevant funding window in the future. Offsite improvements will depend on whether buses serve the development directly. As a bare minimum a pair of new stops and shelters with RTPI screens will be needed on The Street between Wrights Way and Broomhill Lane. Expected cost £35,000. In addition a second pair of new stops between the current exit from the A14 and the Jewers Warehouse site. Stops to include shelters at a total of £15,000 plus footway costs.

- 5. Libraries.** Refer to the NPPF Section 8: 'Promoting healthy and safe communities'. 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 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

Using the established methodology, the capital contribution towards libraries arising sought from this scheme would be spent on improving development of library services serving the area of the development, and outreach activity from the nearest library at Elmwell.

Assuming an average of 2.4 persons per dwelling, the capital contribution required for local library improvements arising from this scheme is 2.4 x 300 x £90

CIL Libraries contribution:	£64,800.00
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- 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.

Another 300 new dwellings within the catchment area of the Stowmarket HWRC is a significant increase in potential users of this facility and would exacerbate current traffic and capacity issues by increasing the tonnages of waste processed through this site and the number of vehicular movements.

SCC has a project underway to identify a new HWRC site for the Stowmarket catchment area. Likely cost of a new HWRC is £3m. This is a priority site in the Waste Infrastructure Strategy and some funding has been identified in order to obtain a suitable site, however, the Waste Service would expect contributions of £110 per household from any significant development in this area. In this case a sum in the region of £33,000 would be applicable.

CIL Waste Contribution:	£33,000.00
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- 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.
- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. 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.

9. Fire Service. The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

10. Archaeology. Please refer to consultation response from Rachael Abraham, SCC Senior Archaeological Officer, sent 5th October 2018.

11. Superfast broadband. This should be considered as part of addressing the requirements of the NPPF Section 10 'Supporting high quality communications.' 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 impacting 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 for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

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

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management Directorate

cc Pete Mumford/Sarah Hammond – SCC
Sam Harvey – SCC
Chairman – Woolpit Parish Council
Cllr Jane Storey - SCC

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 10 September 2019 07:39
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Cc: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Subject: 2019-09-10 JS Reply Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

Dear Bradly Heffer,

Subject: Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

We have no further comment to make.

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/>

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 05 August 2019 13:10
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Cc: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Subject: 2019-08-05 JS Reply Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

Dear Bradly Heffer,

Subject: Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/04247.

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

- Flood Risk Assessment and Drainage Strategy Ref 619386-MLM-ZZ-XX-RP-C-0001 Rev 05
- Site Investigation Report Ref GC20560_Sup SI
-

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 Q_{bar} or 2l/s/ha 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 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. Within 28 days of the last occupation details of all Sustainable Urban Drainage System components and piped networks shall be 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 that the Sustainable Drainage System has been implemented as permitted and that 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/>

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/>

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 03 June 2019 11:35
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Cc: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Subject: 2019-06-03 JS Reply Land Off Bury Road, The Street, Woolpit, IP30 9SA DC/18/04247

Dear Bradly Heffer,

Subject: Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/04247.

We note that no further information regarding surface water drainage and refer the LPA back to our consultation reply of the 9th October 2019.

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/>

-----Original Message-----

From: planningyellow@babberghmidsuffolk.gov.uk <planningyellow@babberghmidsuffolk.gov.uk>
Sent: 31 May 2019 16:22
To: RM Floods Planning <floods.planning@suffolk.gov.uk>
Subject: MSDC Planning Re-consultation Request - DC/18/04247

Please find attached planning re-consultation request letter relating to planning application - DC/18/04247 - Land Off Bury Road, The Street, Woolpit, IP30 9SA

Kind Regards

Planning Support Team

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advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

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From: RM Floods Planning

Sent: 09 October 2018 08:37

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

Cc: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>

Subject: 2018-10-09 JS reply Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

Dear Bradly Heffer,

Subject: Land Off Bury Road, The Street, Woolpit, IP30 9SA Ref DC/18/04247

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/04247

The following submitted documents have been reviewed and we recommend a holding objection at this time:

- Flood Risk Assessment and Drainage Strategy Ref 619386-MLM-ZZ-XX-RP-C-0001
- Site Investigation Report Ref GC20560_Sup SI

The reason why we are recommending a holding objection is because whilst the applicant has advised that infiltration isn't viable across the site, but that a area to the south of the site can utilise infiltration, whilst the north of the site will utilise a controlled discharge to a watercourse. However, the test report appears to not have been submitted.

The applicant is proposing to discharge to a watercourse for the northern part of the site, but they have not advised if a) they have the rights or permission or b) that the watercourse flows into a OS mapped watercourse.

The method of conveying the water to the basins is via pipes, the LLFA would recommend that the site utilises above ground SuDS to convey the water to the basins, which would then mimic the sounding landscape of Woolpit. There is an issue with the indicative surface water layout which indicates that the inlets and outlet of the are very close together and as such the basin will only offer a limited amount of surface water treatment prior to the water being discharged.

There is one issue with regard to the flood risk assessment and that it has not identified or evaluated any historical surface water flood event.

Note: any works to a watercourse will need Land Drainage Act consent, which is outside of the planning application and may affect layout of this development. It is against Suffolk County Council policy to pipe existing open watercourses

The points below detail the action required in order to overcome our current objection:-

1. Submit an updated FRA identifying and evaluating the existing surface flood risk to properties along White Elm Road
2. Submit an impermeable area plan showing what areas (ha) will a) utilise infiltration and b) discharge to the watercourse at a controlled rate
3. Submit a copy of the infiltration test report and location plan of the trial holes as it cannot be found as a submitted document, but is referenced.
 - a. Note the southern part of the site is advised to be utilising infiltration
4. Submit a watercourse route map with photograph's showing that the watercourse flows to a OS mapped watercourse
5. Submit evidence that the land owners has the rights to discharge surface water into the adjacent watercourse
6. Submit a revised surface water drainage plan showing the use of above ground open Suds to convey surface water to the basins.
7. Submit a revised surface water drainage plan showing inlets and outlets at opposite ends of the basins

Those highlighted have not been received and should be submitted in support of the application

Pre-app	Outline	Full	Reserved Matters	Discharge of Conditions	Document Submitted
✓	✓	✓			Flood Risk Assessment/Statement (Checklist)
	✓	✓			Drainage Strategy/Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of 3rd party agreement to discharge to their system (in principle/consent to discharge)
		✓		✓	Maintenance program and ongoing maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration test results (BRE365)
		✓	✓	✓	Detailed landscape details
		✓	✓	✓	Discharge agreements (temporary & permanent)
		✓	✓	✓	Development management & construction phasing plan

planningadmin@babberghmidsuffolk.
gov.uk

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
Our Ref: FS/F311008
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 08/10/2018

Dear Sir/Madam

Land off Bury Road, The Street, Woolpit, IP30 9SA
Planning Application No: DC/18/04247

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.

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and firefighting 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

Water Officer
Suffolk Fire and Rescue Service

c.c. Mr James Alflatt
Bidwells
16 Upper King Street
Norwich
NR3 1HA

James.alflatt@bidwells.co.uk

Enc. Sprinkler Letter

planningadmin@babberghmidsuffolk.
gov.uk

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
Our Ref: ENG/AK/LG
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.Businesssupport@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 8 October 2018

Planning Ref: DC/18/04247

Dear Sir/Madam

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land off Bury Road, The Street, Woolpit, IP30 9SA
DESCRIPTION: Proposed 300 dwellings
NO: HYDRANTS POSSIBLY REQUIRED:

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

OFFICIAL

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.

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

Water Officer

Water Officer
Suffolk Fire and Rescue Service

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

Enquiries to: Rachael Abraham
Direct Line: 01284 741232
Email: Rachael.abraham@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_04247
Date: 5th October 2018

For the Attention of Bradly Heffer

Dear Mr Isbell

Planning Application DC/18/04247- Land off Bury Road, Woolpit: Archaeology

This large site lies in an area of archaeological potential recorded in the County Historic Environment Record. It is situated at the confluence of two tributaries of the Black Bourn River and on light soils, making it a very favourable location for early occupation. Within the site itself, finds scatters of prehistoric, Roman and medieval date have been recorded (WPT 015, 017 and 032). As a result, this location has good potential for the discovery of important hitherto unknown archaeological sites and features. The proposed works would cause significant ground disturbance that has potential to damage any archaeological deposits and below ground heritage assets that exist.

There are no grounds to consider refusal of permission in order 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 two 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 part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

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

INFORMATIVE:

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

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

Rachael Abraham

Senior Archaeological Officer
Conservation Team



21 February 2019

Bradley Heffer
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Bradley,

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

Application: DC/18/04247

Location: Land Off Bury Road The Street Woolpit IP30 9SA

Proposal: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

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

No objection subject to conditions to secure ecological mitigation and enhancements.

Summary

We have reviewed the submitted documents provided by the applicant by Applied Ecology Ltd, relating to the likely impacts of development on designated sites, Protected & Priority species / habitats. This includes the Ecological Report (July 2018), Hedgerow Pre & Post development Plan, The Biodiversity Management Areas and the GCN and Reptile Mitigation (January 2019).

In addition, we have reviewed the Applied Ecology response for Place Services Holding Objection (January 2019).

After review of this additional information, we are satisfied that there is sufficient ecological information available for determination of this application. We are also satisfied with the amended plans and clarification provided by Applied Ecology Ltd, relating to Great Crested Newt, bats species, reptile species and Badger.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We



support the reasonable biodiversity enhancements, which should also be secured by a condition of any consent.

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

However, we recommend the proposed recommendations to ensure that Protected and Priority species / habitats will be appropriately conserved and enhanced within this application:

- A badger survey should be undertaken prior to commencement to assess any changes to Badger activity within this application.
- A Landscape and Ecological Management Plan should indicate that the 200 metres of Hedgerow, planned as compensation for the hedgerows proposed to be removed, should be planted with native species-rich planting. This will ensure that appropriate compensation for Priority habitat has been provided within this application.
- A Biodiversity Enhancement Strategy should be provided and could be included within the Landscape and Ecological Management Plan. This must indicate, at a minimum, the provision of a number of appropriately located bird and bat nest boxes, as well as, Hedgehog Friendly fencing throughout the site. However, we also consider it appropriate that Swift boxes/integrated bricks could be provided within this application.
- We recommend that the ecologist should be involved within the Lighting Design Scheme to ensure that impacts from lighting to foraging and commuting bats are appropriately avoided in this application.

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

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

Recommended conditions:

1. CONCURRENT WITH RESERVED MATTERS: SUBMISSION OF A COPY OF THE EPS LICENCE FOR GREAT CRESTED NEWTS

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

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

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



2. CONCURRENT WITH RESERVED MATTERS: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

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

The CEMP (Biodiversity) shall include the following.

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

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

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

3. CONCURRENT WITH RESERVED MATTERS: SKYLARK MITIGATION STRATEGY

"A Skylark Mitigation Strategy shall be submitted to and approved by the local planning authority to compensate the loss of any Skylark territories. This shall include provision of eight Skylark nest plots, to be secured by legal agreement or a condition of any consent, in nearby agricultural land, prior to commencement.

The content of the Skylark Mitigation Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed Skylark nest plots;*
- b) detailed methodology for the Skylark nest plots following Agri-Environment Scheme option: 'AB4 Skylark Plots';*
- c) locations of the Skylark plots by appropriate maps and/or plans;*
- d) persons responsible for implementing the compensation measure.*

The Skylark Mitigation Strategy shall be implemented in accordance with the approved details and all features shall be retained for a minimum period of 10 years."

Reason: To allow the LPA to discharge its duties under the NERC Act 2006 (Priority habitats & species)



4. CONCURRENT WITH RESERVED MATTERS: PRE-COMMENCEMENT SURVEY FOR BADGERS

No development shall take place until a further survey for the presence of Badgers is carried out and the results plus any appropriate mitigation measures in the form of a method statement has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved by the Local Planning Authority. Any modifications to the approved details, for example as a result of a protected species licence being required, must be submitted to the Local Planning Authority.

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the Badger Protection Act 1992 and the Wildlife & Countryside Act 1981.

5. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

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

The content of the LEMP shall include the following:

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

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

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

6. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY

“A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*



e) *details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."

Reason: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

7. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

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

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

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

Please contact us with any queries.

Yours sincerely,

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

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

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



19 October 2018

Bradley Heffer
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Brad,

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

Application: DC/18/04247

Location: Land Off Bury Road The Street Woolpit IP30 9SA

Proposal: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information

We have reviewed the Ecological Report (Applied Ecology Ltd, July 2018) provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species / habitats.

We are not satisfied that there is sufficient ecological information for determination. The following needs to be provided prior to determination:

- Demonstration of full recommendations of GCN mitigation measures
- A further Bat activity survey and mitigation measures (if required).
- Demonstration of an appropriate reptile receptor site.
- Demonstration of an appropriate Badger exclusion zone.

Further details on the requirements for Protected & Priority Species and habitats for this application have been highlighted below:



Protected Species

Great Crested Newts

We agree with the findings of the applicant's ecological consultant that a Low impact Great Crested Newt Licence should be provided for this application as a condition of any consent. Proposed mitigation measures should still be submitted to local planning authority to ensure certainty of impacts to the protected species.

Bats

The submitted bat activity survey has not included the northern boundary hedgerow of the red line boundary. Therefore, the bat activity has not been assessed for this boundary feature. A section of this hedgerow will be removed to facilitate the main road of this development and will also be built against by residential development in a small section.

Therefore, it is considered that impacts to foraging and commuting bats have not been appropriately assessed until a further activity survey of the northern boundary hedgerow has been undertaken for this application. This is required to follow [BCT Bat Survey Guidelines](#) for bat activity surveys.

Reptiles

The reptile surveys also are considered to not fully follow the [Gov.uk website](#) and [Frog Life](#) guidance. This is because three of the seven surveys were undertaken in October and one of the surveys was undertaken outside the appropriate survey temperature (9-18°C). Therefore, certainty of the reptile population has not been fully provided.

The proposed location for the receptor site is also considered not appropriate. This is because the receptor site is completely isolated by busy roads and will not allow free movement of reptiles once they are translocated. This is required as the [Gov.uk website](#) highlights that a receptor site should "serve the same function as the habitat to be lost". We accept that, in theory, the receptor site does follow for reptile translocation methodology, as the site is larger than the area of suitable habitat proposed to be removed. However, as complete certainty of the population size has not been provided due to the survey methodology, it is considered that any reptiles on site should be translocated to a receptor site which guarantees the long-term viability of the population.

Therefore, it is recommended that appropriate measures are provided for reptile species prior to determination of this application. This should be secured via the provision of an appropriate offsite receptor site i.e. a site that is proportionate in size or of substantially better quality than the suitable reptile habitat being removed to facilitate the development and also ensures connectivity in the wider landscape.

Badgers

We note the presence of badgers was identified as result of ecological survey. The badger setts were found immediately adjacent to the northern red line boundary and comprised of a subsidiary sett of four active holes, and an outlier sett with two active holes. However, the landscape Master Plan highlights that houses will be placed adjacent to the Badger sett. Therefore, it is considered that there is a possible negative effect to the Badgers from this development.



Consequently, further information should be provided to demonstrate how the development will be implemented without interference with this sett, which would require a licence. An appropriate exclusion zone dependent on the proposed nearby construction activity should be provided if required, following the [Gov.uk website](https://www.gov.uk/guidance/badger-mitigation-licence) guidelines. If an appropriate exclusion cannot be provided then a Badger Mitigation Licence should be sort from Natural England.

Priority Species

Hedgehogs

We note the presence of hedgehogs present within the local vicinity after assessing the Suffolk Biodiversity Information Services species records. Therefore, we recommend that mitigation and enhancement measures for hedgehogs should also be provided for this application. This should recommend that trenches on site should also be covered at night or have ramps to prevent and avoid hedgehogs being trapped during construction and that hedgehog friendly fencing should be provided throughout the site. This is likely to be condition of any consent.

Skylarks

The Breeding bird Surveys determined that a max of seven Skylark territories could be situated within the proposed red line boundary. Therefore, a Skylark Mitigation Strategy should be submitted prior to commencement as a condition of any consent. This should include a total of 14 skylark plots (two plots per Skylark territory lost) to compensate for the loss of ground nesting habitats. This will need to be secured within nearby arable land for this application for 10 years via a unilateral legal agreement.

The plots should be delivered in accordance with the guidelines set out in Countryside Stewardship option AB4 (Skylark Plots) available at: <https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4>. The plots can also be rotated around the arable farm each year rotation, but the total number of plots must be maintained for the 10 years that they are secured. This is likely to be condition of any consent.

Priority habitats

Hedgerows

We note that 597 metres of hedgerows and trees are proposed to be removed as result of the proposed development. As Priority habitat, any hedgerow to be removed as result of the development will need to be appropriately compensated. This will therefore, need to be demonstrated within submitted plans and documents prior to determination of this application. This is likely to be condition of any consent.

Biodiversity enhancements and Net Gain

Biodiversity Net Gain is development that leaves biodiversity in a better state than before (CIEEM, 2016). It is also an approach where developers work with local governments, wildlife groups, land owners and other stakeholders in order to support their priorities for nature conservation. The ten principles set out in CIEEM's paper *Biodiversity Net Gain - Good practice principles for development, 2016* should be used together to demonstrate net-gain in this development.



In addition, paragraph 174b of the National Planning Policy Framework highlights that plans should identify and pursue opportunities for securing measurable net gains for biodiversity.

Consequently, this additional information is required for the LPA to have certainty of impacts for Protected and Priority species for this application and to demonstrate its 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 missing information to enable us to remove our holding objection.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Place Services at Essex County Council
Hamish.Jackson@essex.gov.uk

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

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



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

18/10/2018

For the attention of: Bradly Heffer

Ref: DC/18/04247; Land off Bury Lane, The Street, Woolpit IP30 9SA

Thank you for consulting us on the Outline Planning Application (Access to be considered) for the erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

This letter sets out our consultation response on the landscape impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site.

Likely impact on the surrounding landscape

According to the Mid Suffolk Core Strategy Development Plan (2008) Woolpit is defined as a 'key Service Centre', which means it has the 'potential to accommodate development which is sympathetic to local character and of an appropriate scale and nature in relation to local housing and employment needs.' The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Rolling Valley Farmlands and Furze landscape character type (LCT). Some of the key characteristics of this LCT include fragmentary broadleaved woodland cover, with multi-species hedgerows including oak, ash, field maple and hawthorn and open views in the transition between the valley and plateau landscapes. As a primary village within this landscape character area, it would be expected that the any emerging development should preserve or enhance these landscape characteristics. The current proposal has provided sufficient evidence that this can be achieved through retention of existing features, vistas to the wider landscape and the formation of formal and informal public open space (POS).

The Woolpit Neighbourhood Plan Landscape Appraisal (Final Draft March 2018), commissioned by the Woolpit Neighbourhood Plan Group identifies the site as falling within the 'Broadgrass Green' character area. Characteristics of this area include; medium scale fields, mixed hedgerows, elevated views from upper slopes and views to church landmarks. It also states the proximity to the A14 to the north, although rarely visible, it can cause noise intrusion. The appraisal also identified that that the application site 'could accommodate some residential development', although, development will have the 'potential to alter the settlement form and character, undermining the rural setting to the church and alter perceptions of arrival. Nevertheless, the southwestern part of this site has some capacity for new housing development which is closely associated with the existing urban edge.' Therefore it is recognised that the site has the potential to accommodate residential development that is sensitively designed and reflects Woolpit's rural village character. The proposed development has been designed with this statement in mind, with formal open space located on the eastern boundary, views to the church retained and the current gateway character as you enter the village from the North being unaffected.

Review on the submitted information

Relevant to this landscape review, the submitted application includes an illustrative masterplan, Design and Access Statement (DAS) and Landscape and Visual Impact Assessment (LVIA).

The illustrative masterplan, although indicative, has taken on board the comments made in the Woolpit Neighbourhood Plan Landscape Appraisal and has positioned the majority of the residential development within the south western parcel of land, which means views of the church can be retained and there is clear separation between the residential parcels and the A14. As part of the proposal there is large areas of public open space (POS) and retention of existing landscape features that will contribute to enhancing the landscape character.

The LVIA accurately presents the likely effects of the proposed development on the landscape. After a site visit and desktop assessment it was clear that although 'views are critical in defining and reinforcing sense of place and local distinctiveness' the site is generally visually contained by the surrounding hedgerows, trees and topography of the landscape and therefore the proposed development will not have a detrimental impact on landscape character and visual amenity, nor the gateway character as you approach the village from the A14 to the north. The Landscape Strategy Plan within the LVIA identifies how a development proposal can be designed sensitively and should be applied to any future masterplan development.

The DAS highlights the opportunities and constraints of the site and how these have been applied to the design principles for both the built and natural environment. Although prescriptive, we would expect the principles to be applied to any future reserved matters application.

If minded for approval I recommend that the following design aspects are considered:

- Large areas of POS are being utilised as attenuation basins. We would recommend that on-street sustainable urban drainage systems (SuDs) such as swales, rain gardens and drainage channels are explored to reduce the amount of POS expended by water attenuation.
- If attenuation areas are retained, we would recommend that they remain open and are designed to allow them to be used for recreational activities during dry periods.
- Existing hedgerows should be enhanced through addition infill shrub and tree planting, specifically on the northern and eastern boundaries.
- The Street frontage hedgerow is likely to be removed by the need for the new highway access and visibility splays. Ensure that this is replaced by a new native species hedge and trees to ensure that the road-scape retains a semi-enclosed appearance over-time.
- Residential gardens should be designed to be a usable space. We advise that terraced properties have a minimum garden size of 50sqm, with larger dwellings exceeding this recommendation. Similarly, any apartments should have access to private amenity space, whether this is in the form of courtyards or balconies.
- Proposed street trees should be within the public realm to ensure they are managed and maintained sufficiently. Appropriate tree pit details and anchor systems should be used to aid establishment and growth.

In the event that approval of this outline application is forthcoming then the following reserved matters conditions should be considered:

- Development of a detailed masterplan including open space/green infrastructure plans.
- We would expect to see a detailed landscape strategy that demonstrates how the proposal links with the surrounding residential areas, green infrastructure and movement network, in order to create an appropriate public realm and provide suitable levels of amenity space. Suitable content includes:

- Boundary treatments (inc. sections)
 - Hard landscaping strategy
 - Planting strategy (Trees, Shrubs and Plants)
 - Integrated SuDS strategy within the landscape proposals
 - Play strategy
- Phasing and delivery of landscape infrastructure and advance planting.

If you have any queries regarding the matters raised above, please let me know.

Kind regards,

Ryan Mills LMLI BSc (Hons) MSc
Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Planning Application – Consultation Response

Planning Application Reference:	DC/18/04247
Site:	Land Off Bury Road The Street Woolpit IP30 9SA
Proposal:	Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	07/01/2020

1. Infrastructure Delivery Plan (IDP) position

The IDP (July 2019) sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 22nd July 2019 as evidence which supports the Joint Local Plan and is an iterative document which will change over time dependent on changing infrastructure capacity, requirements and priorities.

The application site is part of the proposed site allocations of the emerging Joint Local Plan, southern section of policy reference LA095. For the purpose of this response, and to understand the impact on infrastructure capacity, the content of the IDP has been considered together with the existing planning permissions and responses from infrastructure providers.

Set out below are the current planning applications (over 10 dwellings) and emerging Joint Local Plan land allocations in Woolpit, and because it is of relevance, the applications for Elmswell are also listed:

Woolpit - Existing Permissions (169 dwellings)

- 1636/16 Land south of Old Stowmarket Road – Outline permission for 120 dwellings (Emerging JLP LA094); DC/19/05196 Reserved Matters application for 115 dwellings awaiting decision. This site is also listed in the emerging Neighbourhood Plan for Woolpit, site WPT3, providing around 120 dwellings.
- 2112/16 Land On East Side Of Green Road – Full permission for 49 dwellings (Emerging JLP LA093). This site is also listed in the emerging Neighbourhood Plan for Woolpit, site WPT4. Site recently under construction.

Woolpit - Planning applications awaiting determination (other than this application) (40 dwellings)

- DC/19/02656 Land South Of Old Stowmarket Road – Outline application for 40 dwellings. This site is also listed in the emerging Neighbourhood Plan for Woolpit, site WPT5, providing around 40 dwellings.

Woolpit – Other emerging Joint Local Plan site allocations (540 dwellings)

- LA095 Land south of A14, north east of The Street and east of White Elm Road - 500 dwellings (300 dwellings under this application). With land allocation for pre school and primary school.
- LA096 – Land north east of Heath Road, adjacent to Woolpit Primary School – 10 dwellings
- LA097 - Land west of Heath Road – 30 dwellings

Elmswell - Existing Permissions (634 dwellings)

- 0846/13 former Grampian Harris site - 190 dwellings (under construction)

- 0210/17 – Land To The East Of Ashfield Road - 106 dwellings (awaiting decision on Reserved Matters)
- 4911/16 – Land adjacent to Wetherden Road - 240 dwellings (Full planning permission obtained October 2018)
- 3469/16 – Land to the East of Borley Crescent - 60 dwellings (Full planning permission obtained June 2019)
- 4909/16 – Land east of Warren Lane & west of Cresmedow Way - 38 dwellings (Outline planning permission obtained June 2018)

Elmswell - Planning applications awaiting determination (105 dwellings)

- DC/18/02146 – 105 dwellings (Emerging JLP LA065)
- DC/19/03924 - 65 dwellings

Elmswell - Emerging Joint Local Plan site allocations (not under application) (160 dwellings)

- LA064 - Land north of Church Road – 60 dwellings
- LA066 - Land west of Station Road – 100 dwellings

There are several essential infrastructure needs for Woolpit that are identified:

- Education
The IDP states that within Woolpit a new pre school setting for 60 places is needed with proposed land allocation on LA095. This is also required in the response from the County Council dated 21/10/2019, to establish a new early education setting on the site of the new primary school. A new primary school is also to be provided in Woolpit to supply growth of Elmswell and Woolpit. This is identified in the IDP as a 210 place school initially and able to expand to 420 places. We understand that the needs for a new early years setting and new primary school are addressed within the proposed scheme. The County Council (response of 21/10/2019) have confirmed an area of 2.2ha will be sufficient. This new primary school would have the potential to provide for this development together with the committed growth and other Joint Local Plan proposed allocations. For the secondary school provision, the expansion of Thurston Community College from 1940 to 2190 places is planned, to provide for this development together with committed and planned growth of the Joint Local Plan.
- Transport
The IDP states that within Woolpit, contributions towards the new footway links would be required as well as the mitigation measures already agreed with the County Council and Highways England for the A14 junction 47. Specific site details and required contributions are provided through the County Council Highway response. The IDP also refers to contributions towards a new cycle/pedestrian link between Elmswell and Woolpit. This currently cannot be provided through the Community Infrastructure Levy (CIL) and it would be appropriate to seek S106 contributions. As per the response from the County Council Highways of 24/10/2019 we understand that part of this scheme is to be delivered by the developer either by condition or S106 contribution.
- Health
The local practice is Woolpit Health Centre, where the IDP refers to expansion of the practice and CIL contributions would be required.

2. Other Policy Considerations

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA095.

The emerging Woolpit Neighbourhood Plan is currently out for Regulation 16 Submission Consultation (ends on the 7th February 2020). The application site is not identified as an allocation within the Neighbourhood Plan. The Regulation 16 Plan identifies three key views which relate to this site which should be taken into consideration.

3. Summary

It will be essential that the above points are considered in conjunction with the current application process and infrastructure needs must be satisfactorily addressed in accordance with the respective infrastructure providers consultation replies and the IDP.

In terms of the infrastructure proposed through this development, the identified needs of the IDP are met in terms of the new primary school and early years setting and are identified as essential infrastructure for the delivery for the planned growth of the emerging Joint Local Plan. The scheme also contributes to the delivery of other key infrastructure required to enable the sustainable growth of the area, such as the new cycle/pedestrian link between Elmswell and Woolpit, as well as mitigation measures/contributions towards highways, health, open space, bus stops, car parking for the village and improvements for the burial ground (access and car park).

The scheme is therefore supported by the Strategic Planning Team.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

From: David Pizzey
Sent: 01 October 2018 10:05
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/18/04247 Land Off Bury Road, The Street, Woolpit

Brad

I have no objection in principle to this application subject to it being undertaken in accordance with the measures outlined in the accompanying arboricultural report. Although a number of trees/sections of hedge are proposed for removal they are generally of limited amenity value and their loss will have negligible impact upon the character of the local area. If you are minded to recommend approval we will also require a detailed Arboricultural Method Statement and Tree Protection Plan in order to help ensure harm is not caused to the trees scheduled for retention, this can be dealt with under condition.

Please let me know if you require any further input.

Regards

David

David Pizzey FArborA
Arboricultural Officer
Tel: 01449 724555
david.pizzey@babberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils – Working Together

From: Nathan Pittam
Sent: 01 October 2018 13:23
To: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: DC/18/04247. Land Contamination.

Dear Bradly

EP Reference : 249519
DC/18/04247. Land Contamination.
SH, Street Record, The Street, Woolpit, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and ...

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

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk
Work: 07769 566988 / 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk

From: Nathan Pittam

Sent: 17 October 2018 10:36

To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

Subject: DC/18/04247. Air Quality

Dear Bradly

EP Reference : 249521

DC/18/04247. Air Quality

SH, Street Record, The Street, Woolpit, BURY ST EDMUNDS, Suffolk.

Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and ...

Many thanks for your request for comments in relation to the above application from the perspective of air quality. Having reviewed the Air Quality Assessment from SRL I can confirm that I have no objection to the proposed development from the perspective of local air quality management.

Kind regards

Nathan

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

From: Iain Farquharson

Sent: 17 October 2018 11:49

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

Cc: Bradley Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>

Subject: M3 249520. MSDC Planning Consultation Request - DC/18/04247

Dear Bradley

We have reviewed the information submitted so far in support of this application that relates to sustainability.

We are very pleased to see that the applicant has considered this topic at an early stage and makes reference to several items in sections 7.43 to 7.63 of the Design and Access Statement.

A target of a 10% reduction in CO2 via low carbon and renewable technology is offered alongside other items such as reducing water consumption, A rated materials etc.

We would be happy to support this application only if the items in sections 7.43 to 7.63 are fully committed to by the developer rather than 'targeted' and 'where applicable' or 'considered'

We would also like to see provision for electric vehicle charging as per NPPF and Suffolk parking policy ie:

A minimum of 1 space per every 20 non-residential spaces should have charging points installed for electric vehicles. Ducts should be provided for a further 5% in all work place

Spaces. Access to charging points should be made available in every residential dwelling. This may be provided in garages or car ports or through shared charging points.

We request that all of the above is conditioned should permission be granted.

Regards

Iain Farquharson

Senior Environmental Management Officer

Babergh Mid Suffolk Council

From: Peter Chisnall

Sent: 17 October 2018 16:07

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

Subject: DC/18/04247

Hi Bradly,

Proposal: Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

Location: Land Off Bury Road, The Street, Woolpit, IP30 9SA

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

Having reviewed the application I can confirm that Environmental Protection has no objection to the proposed development.

The Applicant's Noise Assessment confirms that:

The dominant noise source affecting the proposed development is road traffic from the A14. Operation noise from the haulage company located to the west of the site was audible during lulls in road traffic and not dominant.

The criteria for indoor ambient noise levels for to the northern boundary and dwellings facing The Street can be met by installing standard thermal double-glazing windows and non-acoustic trickle ventilators. The criteria for indoor ambient noise levels for dwellings which are shielded from the roads

can be achieved with open windows. This is subject to the final layout of the scheme.

Noise levels in external living areas are predicted to be within the recommended criteria.

Noise is not an issue for the proposed school area in terms of noise break in to the classrooms.

External plant noise limits set in this report should be adhered to.

Within the Planning Statement the applicant mentions that if the planning application is approved then a CEMP, Construction Environmental Management Plan, would be provided at the reserved matters stage. I would suggest the following condition:

I would advise that prior to any work commencing on site a Construction Environmental Management Plan (CEMP) shall be submitted and agreed in writing with the Local Planning authority (LPA). Regarding mitigation measures for the control of pollution (including but not limited to noise, dust and lighting etc.) during the construction phase. The CEMP shall be adhered to at all times during the construction phase, unless agreed in writing with the LPA.

Thanks

Peter

Peter Chisnall

Environmental Protection Officer

Babergh & Mid Suffolk District Councils - Working Together

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Bradly Heffer – Senior Planning Officer
From: Julie Abbey-Taylor, Professional Lead – Housing Enabling
Date: 31/10/2018

SUBJECT: - **Application Reference: DC/18/04247/OUT**

Proposal: Outline Planning application for the erection of up to 300 dwellings, construction of a new spine road, land for new primary school, burial ground extension, village car park and associated infrastructure on land off Bury Road, Woolpit

Key Points

1. Background Information

A development proposal for up to three hundred (300) residential dwellings
--

This is an open market development and should offer 105 affordable housing units which = 35% policy compliant position. The applicant is not proposing a policy compliant position in terms of numbers of AH and has included 20% affordable housing provision – 60 dwellings on the basis of scheme viability.

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 **97 new affordable homes per annum**.

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%

4+	2%
----	----

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

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.740 applicants registered for affordable housing in Mid Suffolk at October 2018.

2.7 A Local Housing Needs survey was carried out by Community Action Suffolk in partnership with the Parish and District Council in 2017.

2.8. This site is a S106 planning obligation site, so the affordable housing provided will be to meet district wide need hence the **740** applicants registered is the important number.

3. Proposed Mix for Open Market homes.

PRIVATE MARKET HOUSING			AFFORDABLE HOUSING*		
No. of Bed-rooms	No. of Dwell-ings	%	No. of Bed-rooms	No. of Dwellings	%
1 bed	16	7	1 bed	10	17
2 bed	56	23	2 bed	33	55
3 bed	102	42.5	3 bed	12	20
4 bed	66	27.5	4 bed	5	8
Total	240	100	Total	60	100

The table above only refers to bedroom numbers not property types. The inclusion of bungalows/chalet bungalows would be welcomed as this will provide opportunities for older people to downsize and developers need to assist with meeting the needs of our aging demographic by providing suitable housing for people to downsize to.

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.
- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

4. Proposed mix for Affordable Housing

4.1 105 of the proposed dwellings on the development should be for affordable housing if providing at 35% of the total development. The application, however, is offering only 20% affordable housing. Again, information is only provided on the basis of bedroom numbers, not property types or tenure.

In order to justify a level of affordable housing at 20%, a viability appraisal must be submitted and reviewed. In the absence of this, if 20% is the final position, this would provide 60 dwellings and they should be provided in the form set out below: -

Rented (45): -

- 6 x 1 bed 2-person flats @ 50sqm
- 4 x 2 bed 4-person flats @ 70 sqm
- 4 x 2-bedroom 3-person bungalows @ 61sqm
- 24 x 2 bed 4-person houses @ 79 sqm
- 7 x 3 bed 5-person houses @ 93 sqm

Shared Ownership (15): -

4 x 2 bed 4-person flats @ 70 sqm
 8 x 2 bed 4-person houses @ 79 sqm
 3 x 3 bed 5-person house @ 93 sqm.

If 35% affordable housing was to be secured, we would require the following mix: -

Rented (73 dwellings): -

6 x 1 bed 2-person flats @ 50 sqm
 6 x 2 bed 4-person flats @ 70 sqm
 6 x 2 bed 3-bungalows @ 63sqm
 36 x 2 bed 4-person houses @ 79sqm
 17 x 3 bed 5-person houses @ 93 sqm
 2 x 3 bed 6-person houses @ 102sqm

Shared Ownership (32 dwellings): -

4 x 2 bed 4-person flats @ 70 sqm
4 x 2 bed 3-person bungalows @ 61 sqm
16 x 2 bed 4-person houses @ 79 sqm
8 x 3 bed 5-person houses @ 93sqm

The above mix is requested and to be included in the S106 agreement if the permission is granted.

5. Other requirements for affordable homes:

- Properties must be built to current Homes and Communities Housing Technical Standards March 2015.
- The council is granted 100% nomination rights to all the affordable units on first lets and a minimum of 75% on relets. A draft Nomination agreement should form one of the S106 agreement schedules.
- Adequate parking provision is made for the affordable housing units.
- Shared ownership initial shares should not exceed 70%.
- The affordable housing should be delivered at the same time as open market dwellings – a trigger mechanism should be included in the S106 agreement.

Julie Abbey-Taylor, Professional Lead – Housing Enabling

From: Tegan Chenery <Tegan.Chenery@babberghmidsuffolk.gov.uk>
Sent: 16 July 2019 16:14
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/18/04247 - Heritage response

Hello Bradly,

DC/18/04247 – Land off Bury Road, The Street, Woolpit

Following the submission of the 'Overview of approach to heritage issues' report by CgMs, the Heritage Team maintains its initial view set out in our response dated 07/01/2019. The report has summarised the heritage issues considered in the application but it is not clear that the scheme has altered.

The current application is in outline form with access *only* to be considered. The proposed masterplan showing layout and other plans demonstrating density etc. are only indicative and so the development is entirely subject to all details required in a reserved matters application, should the outline scheme be approved. Whilst the principle of a modest amount of development is not opposed, there are various heritage issues which would need to be addressed in a detailed scheme. If the suggested number of houses is to remain at 300, the proposal would undeniably cause a level of harm to designated heritage assets.

Please refer to our previous comments.

Tegan Chenery

Heritage and Design Officer

Babergh and Mid Suffolk District Councils - Working Together

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From: Tegan Chenery <Tegan.Chenery@babberghmidsuffolk.gov.uk>
Sent: 07 January 2019 15:05
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/18/04247 - Heritage response

Hi Bradly

DC/18/04247 – Land off Bury Road, The Street, Woolpit

This application is an outline proposal for a residential development of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure; with access only to be considered. The site is situated to the north of the village of Woolpit, as well as partially bordering the northern periphery of Woolpit Conservation Area. To the southern boundary of the site is the GII listed building 'Monks Close' (as noted on the National Heritage List for England [NHLE]), as well as the site being in close proximity to a number of listed buildings scattered throughout the historic core of Woolpit, along The Street, Church Street and Green Road.

As such, the issues of heritage concern relate to the potential impact of the proposed residential development on the character of the conservation area and the setting of various listed buildings, including the GII listed Monks Close, GI listed Church of St Mary in Woolpit and GII* Church of St John in Elmswell.

Giving consideration to the Master Plan which provides an indicative site layout, and following a site visit, it is evident that a development of this scale in this location has the potential to cause harm to designated heritage assets in the vicinity; both Woolpit Conservation Area and listed buildings. The concerns laid out in the representations of Historic England and the Suffolk Preservation Society are broadly agreed with by the Council's Heritage Team. The proposal site which forms part of the setting of various heritage assets – most apparent, the GI listed Church of St Mary in Woolpit and the GII* Church of St John in Elmswell, as well as the conservation area – is, in its largely undeveloped state, considered to positively contribute to their significance.

The northern boundary of the conservation area acts as a link between the historic core and the rural landscape in the wider setting to the north. In addition, the GII listed Monks Close stands in this position, the setting of which extends into the proposal site via the building's immediate northern boundary. A large proportion of the historic core has now been bounded by 20th century development to the south east, west and north west. Prior to the extensive 20th century development, Woolpit's historic core would have intimately related to this rural setting with the open landscape surrounding it. A large scale residential development in this location necessitates careful consideration of this partially surviving linking feature to the historic rural setting of Woolpit through the layout, density and massing of development on this site. This would help to ensure preservation of the character and appearance of the conservation area and the rural setting which currently makes a positive contribution, informing of the previous extent of the historic village and its agricultural context.

The settings of the two listed churches, St Mary in Woolpit and St John in Elmswell, also requires thought in regard to the extent of development on the proposal site. The submitted Built Heritage Statement with the application discusses in part the setting of the Church of St Mary but largely dismisses the potential impact of the development on the Church of St John. The statement suggests that by introducing sight lines through the development (7.12), views to the north-east of the tower at Elmswell church would be created, thus suggesting this would be an enhancement within the setting, over what is now largely an undeveloped and rural landscape. Again, similar suggestions are made in paragraph 8.4 for Woolpit church, by introducing designed sight lines to the church through the development. This suggestion of enhancement is entirely unsupported by the Heritage Team and recommends that instead, consideration is given wholesale to the extent, layout, density and massing of any potential development on this site. In its current undeveloped form, the proposal site makes a strong positive contribution to the wider setting of both churches and provides historic context and

understanding of the prominent locations of these buildings within their landscape. In addition, the simultaneous views of both churches when viewed from the western boundary of the proposal site, particularly clear from White Elm Road, is an important feature which, enabled by the undeveloped landscape and topography of the area contributes to the appreciation and experience of the designated heritage assets.

The submitted Built Heritage Statement concludes that the development would cause less than substantial harm and so suggests there must be amendments to the current indicative master plan in order to reduce and minimise harm to the designated heritage assets in a reserved matters application.

Whilst in outline only, the Heritage Team agrees that a development of this scale, and in this location, would cause less than substantial harm to the significance of various assets, and as such a fundamental reconsideration of the volume and location of development must be made.

Tegan Chenery

Heritage and Design Officer

Babergh and Mid Suffolk District Councils - Working Together

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

22nd October 2018

Dear Bradly,

RE: DC/18/04247 Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure. Land Off Bury Road, The Street, Woolpit, IP30 9SA

Thank you for sending us details of this application, we have read the ecological survey report (Applied Ecology Ltd, July 2018) and we note the findings of the consultant. We have the following comments:

Badgers

We note that the consultant has recorded the presence of 2 active badger setts along the east-west ditch, just outside the site boundary. The report states that these setts can be retained and protected as part of the proposal. However, the Illustrative Masterplan 002 drawing shows that residential gardens will be directly adjacent to the badger setts. We query how these setts will be protected during and post-construction?

Bats

Ten trees have been identified as having high/moderate potential to support roosting bats. If any of these trees are to be impacted by the proposed development, then further surveys must be undertaken.

Although the bat survey concluded that the site was not likely to be important for commuting bats, seven species were recorded during the surveys. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained around the site for foraging and commuting bats. We recommend that Suffolk County Council's street lighting strategy is used as a basis for street lighting layout and design.

Great crested newts

A Low Impact Class Licence for great crested newts has been recommended. We agree with this recommendation but query the requirement to capture great crested newts from within 250m of Pond 1, where the receptor area would be located and what kind of compensatory habitat would be provided?

Reptiles

We note the recommendation to capture and relocate the small population of common lizards present within the area of semi-improved grassland which is likely to be lost to development. We query where the receptor area will be located and how the reptiles will be discouraged from returning to their original habitat?

Skylarks and other nesting birds

The Breeding Bird Survey recorded up to seven pairs of skylarks using the site as breeding habitat. Compensation for the loss of suitable nesting habitat for this species is therefore required, should consent for development be granted. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

The proposed development would involve the potential loss of both trees and hedgerows which provide habitat for nesting birds, likely including some UK and Suffolk Priority species. The ecological survey report includes recommendations for planting to help compensate for this loss, however from the plans provided it is unclear how this will be implemented given the level of development proposed.

Hedgehogs

Hedgehogs have been recorded in the surrounding area and may occur within the development site. Hedgehogs are listed on Schedule 41 of the NERC Act 2006, making them a material consideration for the LPA. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development. For more information on this topic, see the Hedgehog Street website.

Species-rich hedgerow

The report has quantified the potential loss of 597m of species-rich hedgerow. Hedgerows are a UK and Suffolk Priority habitat under section 41 of the Natural Environment and Rural Communities (NERC) Act (2006), and this hedgerow is also likely to be considered important under the wildlife and landscape criteria of the Hedgerow Regulations 1997 primarily due to the number of woody species present, its position along a ditch and structural continuity.

The National Planning Policy Framework (NPPF) (section 15) and Mid Suffolk DC's adopted Core Strategy document (policy CS5) seek to ensure that all development contributes to and enhances the environment, including protecting Priority habitats and species. Consent should therefore not be granted for any development which would result in the uncompensated loss of Priority habitats.

Landscape and Ecological Management Plan

In addition to any ecological mitigation or compensation measures required, the proposed development should seek to include measures to enhance the site for wildlife. This could include (but is not limited to) additional native planting as part of a landscaping scheme; the inclusion of bird nesting and bat roosting features in to the proposed buildings and the incorporation of garden boundaries which include gaps which hedgehogs can move through.

The consultant has recommended a Construction Environmental Management Plan (CEMP), but we would also recommend securing ecological enhancements and appropriate long-term management of the proposed SUDs and green spaces via a Landscape and Ecological Management Plan, which would include details of enhancements.

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

At present we must **object** to this application due to insufficient ecological information.

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

Yours sincerely

Jill Crighton
Conservation Planner

24 OCT 2018

23 October 2018

Mr Bradly Heffer
Planning Officer
Mid Suffolk District Council
Endeavour House
8 Russell Rd
Ipswich, IP1 2BX

Dear Mr Heffer

DC/18/04247 Outline Planning Application (Access to be considered) Erection of up to 300 dwellings, construction of a new spine road, land for a new primary school, burial ground extension, village car park and associated infrastructure.

Land Off Bury Road The Street Woolpit IP30 9SA

I am writing on behalf of the Suffolk Preservation Society ('the Society') to make representation on the application for the erection of up to 300 dwellings on a greenfield site which is outside, but adjoining, the current physical limit of Woolpit. The site lies to the north of the village, is open and affords elevated views particularly looking north and east, providing a rural foil to the historic settlement. Woolpit is characterised by a high concentration of heritage assets and is designated as a conservation area, the boundary of which forms the southernmost portion of the site. A key feature of the site is the significant contribution it makes to both the setting of St Mary's Church, Woolpit and St John the Divine Church, Elmswell.

We note that the site was included within the SHELAA (2017) as capable of accommodating housing, but identified heritage as a constraint that need careful consideration. It is therefore disappointing that the pre-application advice dated 11 May 2018 does not refer to heritage as a key consideration in examining how the site could be developed to deliver mass housing without compromising its special qualities.

Heritage Impact

In its undeveloped form, the site currently makes a very strong positive contribution to the wider agrarian setting of St Mary's Church, Woolpit and St John the Divine, Elmswell. We agree with the Historic England advice that the site provides historic context and forms an important element within the setting of St Mary's Church, as well as the setting of the conservation area. Although we note that the setting of St Mary's has been materially harmed by the post war housing to the north

west, which negatively impacts on views of the church when viewed from the site, we concur that development in the southeastern portion of the site should be restricted to safeguard the setting of these designated assets.

Historic England advice also notes the intervisibility between St Mary's and St John's which is important and should be reflected in the layout of development. However, a site visit reveals that there are continuous views of St John's from along Bury Road (until the northern most section where they are obscured by hedging) and along White Elm Road (with the exception of a small central section where the land dips and views are lost). Viewpoints along White Elm Road also currently provide clear simultaneous views of both church towers. Notwithstanding the distance, the topography of the intervening landscape means that the A14 is lost from view and the tower of St John's remains a strong and defining element within the landscape.

Simon Knott in his highly respected website *Suffolk Churches, 2010* opens his entry describing St John's with the words *Suffolk has few grander sights to offer than St John the Divine on its hilltop, the barley fields falling away below it. A landmark for travellers on the A14 ... it is among the county's mightiest towers.* The church enjoys an elevated position and when viewed from the south sits remote and isolated, uninterrupted by any modern intrusion. It holds a commanding position and provides a focal point in the landscape. Its imposing scale and placing within the landscape clearly communicates the power of the medieval church and the role that it played in society. Its setting makes a very strong contribution to its significance by virtue of its elevated and detached position. Many churches have been sited on high points in the landscape and were deliberately intended to be visible in long views throughout the wider landscape. Therefore these assets have large settings, which make an important contribution to their value. It is essential that both the extent and value of their wider landscape setting must be given due weight when considering proposed large scale housing developments that impact upon them.

We note from the Open Space and Landscape plan that views of St Mary's church have been identified, including views between the churches, and the layout has taken account of this. However, we consider that further work should be done to identify a number of key views from Bury Road and White Elm Road to St John's and a revised layout sought which responds to these constraints and which retains and enhances these views. For examples, tree lined avenues which frame this view or public open spaces which terminate with views of St John's would succeed in retaining an appreciation, in part, of its landscape setting.

Landscape Impact

The site is identified as Rolling Valley Farmlands and Furze typology in the Suffolk Landscape Characterisation Study (SCC 2011). It is characterised by gentle valley sides with smaller fields in arable use. Ancient woodland on the upper fringes of the valley and isolated churches are notable features of this landscape type. The Babergh Mid Suffolk Landscape Guidance (2015) specifies that *The setting of Historic villages, buildings and monuments blend within this landscape and is sensitive to alterations and or new development which can have a significant negative impact in the existing visual quality and In particular consideration needs to be taken with regards to the impact on the "skyline" and "roofscape" on the sides of the valleys.* It states that the objectives of managing future change include safeguarding historic features and minimising visual intrusion on the very sensitive landscape include impact on the skyline. In view of the previous heritage comments, this advice confirms the importance of managing views within the proposed development.

National, Local Policy and Historic England Guidance

As one of the few statutory considerations in the planning process, heritage assets are afforded protection under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This statutory duty requires the decision maker to afford *special attention to the desirability of preserving or enhancing the character or appearance of the listed building*. This includes the contribution to its significance made by its setting. The NPPF gives clear advice on when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance (paragraph 193).

Historic England guidance amplifies this advice in *Setting of Heritage Assets - Good Practice Advice in Planning, Note 3, Second Edition (2017)*. The guidance explains that setting is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary). It confirms that *The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places* and goes on to explain that *Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance*. Therefore, the Society considers that the setting of both churches makes an important contribution to their significance and must be afforded considerable weight in assessing this application.

Conclusion

The Society acknowledges that in order to deliver the significant levels of growth as set out in the Core Strategy Focused Review, further housing delivery in Woolpit requires some well-considered greenfield development. In this case the site has been allocated for housing development in the 2017 SHELAA. While recognising the recent challenge to the district's ability to demonstrate a five year housing land supply and the public benefit that will be afforded by permitting large scale volume housebuilding schemes such as this, the Society would urge that the setting of St John's is carefully considered and given full weight in progressing this application. The Society considers that in order to avoid the potential for environmental harm; impacting on the landscape character, views and wider setting of the churches, the indicative layout should be comprehensively reviewed to safeguard key views.

We trust you will find these comments helpful in the consideration of this application and would request that the Society is reconsulted on any forthcoming amendments to this scheme.

Yours sincerely,



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Director

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