

Planning Application Reference: 1856/17 - Comments from Barham Parish Council

Barham Parish Council held a joint meeting with Claydon and Whitton Rural Parish Council on Friday 30th June 2017 to gain feedback from residents. The meeting was attended by 138 residents, 5 of whom were specifically concerned about the Old Norwich Road development (1832/17). All other attendees indicated that they were opposed to this development. In addition councillors had received feedback from other residents that were unable to attend.

The Parish Council recognises that the current sewer infrastructure has issues with current volumes, which recently resulted in major repairs to 100 metre section. We believe that significant investment will be required to the mains sewer going through the village if this development is to take place. Without this investment the planned development should be rejected.

The Parish Council has concerns regarding the additional rain water runoff from this development could increase the flood risk in the valley and impact existing housing.

Anglian Water should be consulted in regard to the adequacy of the current water supply to deliver water to the proposed development without a guarantee of sufficient supply the application should be rejected.

The Parish Council has concerns over the traffic volumes that will be generated by this development. Already the road to Henley is a "rat run" during rush hour periods and this development can only make matters worse. Also current traffic volumes along Norwich Road to the south of the Co-op store result in queues at busy times during the day. While we accept that this development alone cannot be responsible for traffic in the area we believe the additional traffic is a pertinent factor in rejecting this application. We do recognise that the closure of Barham Church Lane to the east of the nursing home and the building of a new road through the development will improve traffic flow and safety in the area.

Currently traffic volumes and parking at both the local schools causes problems to local residents we can only perceive that this development will increase these problems. We do not believe that the land set aside for a new school will be utilised until after this development is completed and this view supports our concerns.

The Parish Council has concerns that as this development is outside the natural boundary of the village and the road layout allows for further development to the north of the site. This and future development will impact upon the sustainability of the area.

The Parish Council fully supports the recommendations set out in section 4.5 of the Preliminary Ecological Appraisal document. In addition to this many local residents have expressed their concerns over the impact this development will have on local wildlife and its habitat.

Many local residents have expressed support for the additional parking and ease of access this development would give to Barham Church and thus reconnect it to the village.

Planning Application 1856/17 – Land off Norwich Road Barham and Claydon

Barham Parish Council

The Parish Council still objects to this planning application for the following reasons: -

Roads and Traffic

Our own advice from a professional qualified traffic consultant suggests the following:-

I set out below my preliminary review of the work undertaken by TPA and hope that my brief comments may be of help to your considerations.

From my quick review of the document a few points that jump out at me are as follows:

I expect that TPA will argue that their approach has been agreed through a scoping process with the Highway Authority. Whilst that gives their client some comfort, it doesn't mean that their approach is correct nor that they haven't made errors.

- First key point. Reference paragraph 3.65 in their TA. Their traffic counts were carried out in July. Several points flow from that statement. The first is that July is not a neutral month (i.e. it is a non-typical month) in which to collect traffic data. Traffic flows are generally lower, particularly in the commuting peak hours in July. The potential consequences are that if the traffic analyses which are then presented are based on July traffic volumes, queue lengths and levels of junction operation could be underestimated.

If the development has also been accompanied by an Environmental Impact Assessment it could well be the case that the EIA components (noise air quality etc.) are also therefore underestimated. Not only does that affect the results, it also potentially means that the average person in the street has not been given accurate information upon which to form a view through consultation on the planning application and its likely impacts.

Both the quantum of the results and the potentially flawed consultations could be points for objection.

- The second key point which I note is in the assessment of primary school trips. Some primary school trips (table 5.7) are described as linked i.e. they are made by persons who are already driving on the network i.e. going to work and that is standard and reasonable. There are also external primary school trips forecast which amount to 168. The point to make here is that when development trips are amalgamated as in their table 5.9 those primary school trips have been applied as occurring across the hour 08:00-09:00.

In fact, primary school drop off trips will occur in a much shorter time period, typically peaking around 15 minutes before the commencement of the school. The consequence is that the more peaked concentration of primary school trips, will lead to impacts being more significant than presented in the modeling.

Proof of this is even perhaps unwittingly confirmed by TPA themselves. In paragraph 8.2 when assessing existing conditions, they state that the maximum ratio of flow to capacity (RFC) is 0.84 and occurs only for one 15-minute period of the peak hour. They "this short spike is likely due to the arrivals and departures associated with the dropping off children at the school which is accessed from Claydon Church Lane". In other words, within existing traffic conditions, school drop off is stated by them to significantly impact in 1 peak quadrant yet they have chosen to model the new primary school trips as being spread across the hour.

- The third point to note is junction performance itself. Again, with reference to paragraph 8.2 they note that the ratio of flow to capacity is 0.84. Surprisingly they state this as "nearing capacity". In fact, there is still 16 percent spare capacity, but it's interesting to note how they believe 0.84 is "nearing capacity", particularly when their development takes the junction so

far “over capacity”. We discussed previously how even values over 1.0 are now regularly accepted by Planning Inspectors on the basis that the key test is found in paragraph 32 of the NPPF i.e. not to refuse applications on transport grounds unless cumulative residual impact of development is “severe”.

From our initial analysis no definition of severe has been set. “Reasonable” Peak hour congestion is generally not considered to be a point of “severity” although queues stretching back to create safety issues or other road safety concerns have been found to constitute “severe”.

In any event, table 8.6 shows the future year modeling results for the year 2022 in the “base” case and “with development”. That shows that without development, the ratio of flow to capacity would be 1.04 with a queue of 11, but with development it would increase to 1.29 with a queue of 24. The right turn from Claydon Church Lane similarly increases from 1.02 to 1.26.

There are 3 potential points to consider here, first is whether or not the applicant is proposing mitigation as required by NPPF paragraph 32. It would appear that mitigation has not been proposed.

The second point to consider then is whether an RFC of 1.29 is acceptable. It is actually a significant increase over the base situation and will lead to a queue extending from 11 vehicles to 24. That is clearly a significant increase and depending on where a queue length of 24 vehicles stretches back to, could even create safety issues particularly in an area where primary school children may be walking to school.

The third point, as an aside, is paragraph 10.7 of the Conclusion which states “it has been demonstrated that the development will have a negligible impact on the operation of the surrounding network”. That is certainly not true. An RFC of 1.29 and a more than doubling of a queue to 24 vehicles is not negligible.

A further point to potentially take exception to, is paragraph 8.2.3 which states that “*once an RFC value exceeds a value of 1, there is a disproportional increase in queue lengths compared to increasing RFC and vehicle movements. This means that the queue lengths shown for the future forecast scenario is unlikely to occur.*” That statement is incorrect. Modelling software provides queue length forecasts for what is known as MMQ, Mean, Maximum Queue. That means that in every cycle of the model when a queue is predicted, the maximum length is recorded and then over the 15-minute period for which results available, the average of those maximum queues is the level reported as MMQ.

In simple terms the MMQ length reported is the AVERAGE of each maximum queue so in fact, that reported queue length will be exceeded by typically half of all maximum queue occurrences in the modelled period. It is not true to say that queues will be longer than reported for half of the time because queues wax and wane, but it is true to say that the Mean Max, Queue levels will certainly be exceeded. It is certainly not the case, as TPA have stated, that the queue lengths shown are unlikely to occur.

The final point to make on the assessment results is that if the previous criticisms of July counts and Primary School peaked arrival profile were rectified, the reported results would be worse. That again means that the supporting information which the public had before them could be materially flawed. Referring back again to paragraph the TA 8.23, the TPA comment that once an RFC value exceeds the value of 1 there is a disproportionate increase in queue length, is actually correct. That is because when one tries to force more traffic through a junction than the actual capacity of the junction, those vehicles cannot in fact pass through it and instead add to the back of the queue. Consequently, if higher base flows and higher peak period primary school arrivals were input into the model, the results would disproportionately increase beyond those already over capacity and potentially severe results which have been presented by TPA

Other objections

In addition to the above The Parish Council has concerns that the planned expansion of Claydon Primary School by 25% (larger intake commences in September 2019) has not been factored in to any of the calculations. The expansion of the school is for existing housing development in the catchment area.

No measures appear to be in the submissions to enforce the weight limit on Norwich Road. Currently many HGV drivers use Thornhill Road or Kirby Rise to avoid this weight limit and we would expect the new development to stop access to these roads via the use of weight limit signage.

Provision of a school site

The Parish Council is concerned that this maybe a Trojan Horse to enable further housing development in the area. The expansion of the primary school mentioned above already has planning permission for a further increase of 25% in pupil numbers and the inclusion of a school site which has sufficient space for the creation of a school of similar size to the existing Claydon Primary School can only imply that the County Council expects further development to utilise this school site. The County Council needs to give a fuller explanation as to the reasoning behind their proposal. It must also be born in the mind that the immediate area has already experienced false promises in regard to a new primary school in Great Blakenham.

Provision of a doctor's surgery site

We are very concerned the provision of the site by the developer could be misinterpreted by both the general public and councillors in planning committee to indicate the likely actual provision of a new surgery facility whereas all the indications we have heard is that this is most unlikely to happen in reality.

Parish Boundary

The Parish Council has concerns that as this development is outside the natural built up area boundary of the village and the road layout allows for further development to the north of the site. This and future development will impact upon the sustainability of the area.

Ecological Appraisal

The Parish Council fully supports the recommendations set out in section 4.5 of the Preliminary Ecological Appraisal document. In addition to this many local residents have expressed their concerns over the impact this development will have on local wildlife and its habitat.

Sewerage

The Parish Council recognises that the current sewer infrastructure has issues with current volumes, which recently resulted in major repairs to 100 metre section. We believe that significant investment will be required to the mains sewer going through the village if this development is to take place. Without this investment the planned development should be rejected.

If councillors go against the wishes of the Parish Council, the Parish Council would expect the following conditions to be a prerequisite of planning permission.

Highways

We would expect the new development to stop access to HGV's trying to avoid the weight limit on Norwich Road by extending the weight limit to all through roads going south off the spine road. Also, restriction should be placed on York Crescent, Claydon.

The Parish Council firmly believes that the main spine road that bypasses Church Lane, Barham should be completed and useable by the public at a very early stage of the development.

Housing

We would expect conditions to be placed on the development that enforce their height of buildings so as not to impact the view of the church.

Sewerage

Any improvement to the sewerage system should be undertaken before commencement of any building on the site.

**PROPOSED DEVELOPMENT OF UP TO 300 DWELLINGS AND
ASSOCIATED DEVELOPMENT**

**Land off Norwich Road, Barham and Claydon
Planning Application Number 1856/17**

Review of Transport and Access Issues

Prepared on behalf of:

Barham Parish Council
c/o Barham Parish Clerk
23 Old Rectory Close
Barham
Suffolk
IP6 0PY

June 2018

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Figure 1 Potential Residential Sites (SHELAA 2017)

1 INTRODUCTION

1.1 THaT Consultancy has been appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings, and associated development, on land off Norwich Road in Barham. The proposals are the subject of an outline planning application, reference number 1856/17.

1.2 For the purposes of determining this planning application Mid Suffolk District Council is the local planning authority (LPA), Suffolk County Council is the local highway authority (LHA) and Highways England is the highway authority for the A14.

1.3 The full description of the proposed development as set out on the planning application form dated 5 May 2017 was:

“Outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with associated access and spine and road including works to Church Lane, doctor’s surgery site, amenity space including an extension to the Church grounds, reserve site for Pre-school and Primary School and all other works and infrastructure (with all matters reserved except for access and spine road).”

1.4 By letter dated 22 December 2017 the applicant submitted a revised scheme. The description of the proposed development remained for up to 300 new homes but the reference to self-build plots was reduced from 8 to 7.

1.5 We note though that the description as now included on the LPA’s website is slightly different:

“Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor’s surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).”

2 SITE VISIT

- 2.1 We inspected the site and local highway network on Wednesday, 13 June 2018 in the company of the Chair of Barham Parish Council. As well as inspecting the site and the highway network that is evaluated in the Applicants' Transport Assessment we also inspected the access routes to the existing primary and secondary schools at the end of the school day, and the route to Ipswich by way of Barham Church Lane and Henley.

3 DOCUMENTS REVIEWED

- 3.1 Our advice as set out in this statement is based upon the information available on the LPA's website as of Wednesday, 27 June 2018. At that time there were 146 documents available relating to Application 1856/17, of these approximately 35 were subject to detailed scrutiny as part of our investigations.

4 THE EMERGING LOCAL PLAN AND STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (SHELAA)

4.1 The LPA is preparing a Joint Local Plan with Babergh District Council. As part of that process the two Councils are undertaking a Strategic Housing & Economic Land Availability Assessment (SHELAA). A draft SHELAA report was published in August 2017.

4.2 The draft SHELAA has evaluated potential development sites against a range of criteria.

4.3 The application site is Site Reference Number SS 0076 and is described as “land to the north of Church Lane, Barham”. The proposed land use description is:

“Residential development, approx 300 dwellings. Land would also be reserved for relocate doctor surgery and provide a community building” (stet)

The suitability of the site is stated to be:

“Site is potentially suitable, but the following constraints have been identified which would require further investigation:

Highways-regarding access, footpaths and infrastructure required

Minerals-site lies within Minerals Safeguard Area”

4.4 The application site is only one of several potential residential sites around Barham and Claydon. We have attached as Figure 1 an extract from the SHELAA Consultation Map showing the potential residential development sites near Barham and Claydon. We understand that the “Growth, Highways & Infrastructure Directorate-Strategic Development” section of the County Council are aware of schemes in the locality that together total approximately 1900 dwellings.

5 STATUTORY CONSULTEES

5.1 The relevant statutory consultees with a particular responsibility for transport, traffic and highway matters are Suffolk County Council which is the LHA, and Highways England which is responsible for the motorway and trunk road network including the A14.

Highways England

5.2 Highways England's first consultation response is dated 26 June 2017 and they "*offer no objection*" and do not recommend any conditions.

5.3 Highways England's second consultation response is dated 10 May 2018. In this response they confirm that the changes to the proposed development will have no adverse impact on the strategic road network and therefore their previous response remains in place.

5.4 Having reviewed the relevant sections of the Transport Assessment we take no issue with Highways England's consultation responses and, indeed would have been surprised had they raised any concerns.

Suffolk County Council (the local highway authority)

5.5 The different transport/highway sections within Suffolk County Council have responded in respect of:

- highways development control
- public rights-of-way (PROW)
- travel plan

5.6 By letter dated 7 August 2017 the LHA responded to the first consultation. This response encompassed highway development control matters, travel plan and public rights-of-way matters.

5.7 As far as we are aware the only formal response from the LHA to the second consultation is a response from the Travel Plan Officer dated 15 May 2018 where they state they have "*no further comment to make for the time being*".

5.8 We are concerned by the LHA's consultation response dated 7 August 2017. In this response the LHA:

- sets out a series of 12 "comments";
- sets out a series of conditions that the LHA recommend should be included in any permission should the LPA be minded to grant planning permission;
- presents the Section 106 funding requirements that the LHA is seeking in respect of the Travel Plan
- presents the Section 106 funding requirements that the LHA seeking in respect of the PROW

5.9 We are particular concerned by the issues raised in the fifth, sixth and seventh bullet points under the "comments" section of the consultation return. For ease of reference we have reproduce these comments below:

- *"We have concerns regarding the number of trips created by the development as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area.*
- *The proposed spine road that goes through the site and closure of Church Lane could encourage 'rat running' through the proposed layout of the spine road. Motorists travelling westbound could easily turn onto the first road on the left, left again to re-join Church Lane which would still attract motor vehicles to what will be a sustainable corridor to encourage walking and cycling. These 'rat running' vehicles could potentially conflict with the proposed bus diversion through the site as well.*
- *A safe walking route to the existing primary school (Claydon Primary School) will need to be assessed and identified in the Travel Plan, as the new Primary School is unlikely to be completed during the early phases of the development."*

-
- 5.10 It is clear from the information presented in the Transport Assessment that parts of the local highway network will be operating at, or over, capacity without the new development, and the situation is significantly worse when the additional development generated traffic is taken into account.
- 5.11 The applicants do not propose any mitigation measures in the Transport Assessment. Given the significant amount of new development in the locality our recommendation, as set out below, is that the local highway authority and local planning authority should identify the mitigation measures and any infrastructure requirements based on an assessment of the cumulative impacts and recover these costs from the developments concerned.
- 5.12 The potential risk associated with not following a coordinated approach is that each individual developer led application will seek to argue that their individual development does not precipitate the need for improvements. This is the argument being pursued in the current case where junctions are identified as being overcapacity, but the applicant tries to argue that their proposed development does not justify, or necessitate, implementing any mitigation measures.
- 5.13 We are surprised that in this case the LHA having said that there will be a “detrimental impact of the road network” as a result of the proposed development then, as far as we can tell, says nothing more on the matter.
- 5.14 In our opinion it is premature of the LHA to offer a no objection subject to conditions consultation response in the circumstances.
- 5.15 The next bullet point relates to ‘rat running’ through the proposed new road layout. Again, this is a fundamental issue that should be addressed before planning permission is granted.
- 5.16 The next bullet point relates to providing a safe walking route between the site and the existing primary school.
- 5.17 We are very concerned that the analysis of personal injury accidents as presented in the Transport Assessment only considered a corridor along Norwich Road and the western end of Barham Church Lane. Had the area of search been extended to include the residential area to the south of Barham Church Lane (i.e. the area through which people will walk, cycle, and drive between the proposed new development and the

existing primary school) than they would have been aware of a 'serious' personal injury accident that occurred on Thornhill Road in December 2015.

- 5.18 Having observed conditions on the local highway network at the end of the school day we have grave concerns about the suitability of introducing additional pedestrian, cycle or vehicle movements unless, and until, measures are implemented to improve the highway environment and reduce the risk to vulnerable road users.
- 5.19 It should also be noted that the existing Claydon Primary School will expand by 25%, starting in September 2019. Any "safer Routes to School" type assessment whether it be a freestanding exercise or incorporated into the proposed Travel Plan for the new development, should take this planned expansion into account.
- 5.20 We note that the proposed new link road involves creating a crossroads junction with Barham Church Lane and Thornhill Road. It seems very likely that such a new junction will serve to encourage residents of the new development to drive to drop-off/collect their children from Claydon primary school, perhaps on their way to/from work.

6 ISSUES AND RECOMMENDATIONS

Recommendation 1

- 6.1 We recommend that the Parish Council approaches the District Council and the County Council to see if they will facilitate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the numerous developments in the area are mitigated in a sustainable, safe and fair manner.
- 6.2 We have made this recommendation because the detailed junction modelling included in the Transport Assessment clearly highlights the fact that even without the proposed new development parts of the local highway network will be operating at or overcapacity. The additional traffic generated by the proposed development will significantly worsen these conditions.
- 6.3 We have some concerns as to the appropriateness of using July traffic count data as a basis for the detailed computer modelling. We would have expected July count data to be factored to represent the annual average weekday peak hour flows. Given the site's location we would expect the July data to be slightly below the annual average figure.
- 6.4 The junction capacity calculations presented in Appendices L, M, N, O and P of the transport assessment together with Chapter 8 in the text highlight the capacity problems on the network.
- 6.5 In the various tables in Chapter 8 the applicants summarise the output of the computer modelling of the various junctions under consideration using the observed 2016 traffic flows, and the forecast 2022 flows both with, and without, the proposed development.
- 6.6 It will be noted that the existing Norwich Road/Barham Church Lane junction operate satisfactorily at present (Table 8.1) and is forecast to do so in 2022 assuming that the development does not take place (Table 8.2).
- 6.7 If the development does take place, then the existing Norwich Road/Barham Church Lane junction would only cater for a very small number of vehicle movements given that most of the traffic will use the new link road through the proposed development

site. Table 8.8 shows that the proposed new site access junction is expected to operate satisfactorily in 2022.

- 6.8 Problems are, however, identified at the Station Road/Norwich Road/Ipswich Road junction and at the Ipswich Road/Claydon Church Lane junction.
- 6.9 At the Station Road/Norwich Road/Ipswich Road junction the maximum ratio of flow to capacity (RFC) is forecast to be 0.87 in 2022 without the development, increasing to 0.95 with the development. The associated “level of service” (LOS) falls to the lowest category (category F) with development.
- 6.10 At the Ipswich Road/Claydon Church Lane junction the maximum RFC without development is 1.04 and this increases to 1.29 with development. During the AM peak hour 2 of the 3 turning movements at the junction have a LOS of F (the lowest level of service).
- 6.11 The Junctions 9 User Guide (Issue D) is published by TRL and explains what RFC and LOS mean.

“RFC: ratio of flow to capacity. The RFC provides a basis for judging the acceptability of junction designs typically an RFC of less than 0.85 is considered to indicate satisfactory performance. This depends however on the context of the study and so the user’s own judgement is also required. Also known as V/C ratio (traffic volume/capacity ratio).”

“LOS: this is the un-signalised Level of Service. The Level of Service (Highway Capacity Manual (HCM 2000)) outputs show the un-signalised, and equivalent signalised, level of service values for the time segment, based on the average delay per arriving vehicle. The transportation LOS system uses the letters A through F, with the definitions below been typical:

A = free-flow

B = reasonably free-flow

C = stable flow

D = approaching and stable flow

E = unstable flow

F = forced or breakdown flow”

6.12 As a junction, or indeed a highway link, approaches capacity flows become unstable and relatively small changes in flow can precipitate large changes in queueing and delay. This is perhaps most dramatically demonstrated on motorways when traffic can slow down dramatically, or even come to a halt, for no obvious reason when the motorway is close to capacity.

Recommendation 2

6.13 We recommend that the development proposals be subject to a Stage 1 Road Safety Audit (Stage 1 RSA) before planning permission is granted.

6.14 We suggest that this RSA should cover the following:

- the new and modified sections of highway infrastructure proposed as part of the development scheme
- the sections of the existing highway network that are or will be operating close to, or above, capacity
- the access routes between the application site and the existing schools
- the access routes between the application site and the village centre
- the route along Barham Church Lane between the application site and the northern outskirts of Ipswich

6.15 The planning application seeks full planning approval for the proposed spine road and associated access works. The LHA has already identified some aspects of the design of the proposed spine road that require assessment/modification to ensure satisfactory visibility and highway safety.

6.16 It is not clear from the information that we have seen exactly what highway infrastructure would be granted planning permission should the application be approved. For example, is not clear what, if any, access arrangements are proposed to the school site. The latest site layout plan shows two access points directly from Norwich Road, but these have not been addressed in the Transport Assessment.

- 6.17 As explained above there are sections of the local highway network that will be operating at, or above, capacity. In the circumstances highway safety can be at risk. We consider it prudent for these risks to be identified and ameliorated as necessary.
- 6.18 We have a concern regarding vulnerable road users, particularly given that many of these users will be children and young people. The Transport Assessment has not given any detailed consideration to the highway safety issues associated with the access routes to/from the site.
- 6.19 We have a particular concern regarding the route to Ipswich along Barham Church Lane. This is a single track road, with limited width and forward visibility, and with relatively high vehicle speeds. The applicants do not propose to make any improvements to this route. We suspect that traffic flows along this route may well be higher in the future than those estimated by the applicants as congestion builds up in the village and drivers seek alternative routes. The situation is likely to be exacerbated by the proposed Ipswich garden suburb northern fringe scheme which may well add additional vehicle movements onto this route.

7 TRANSPORT POLICY

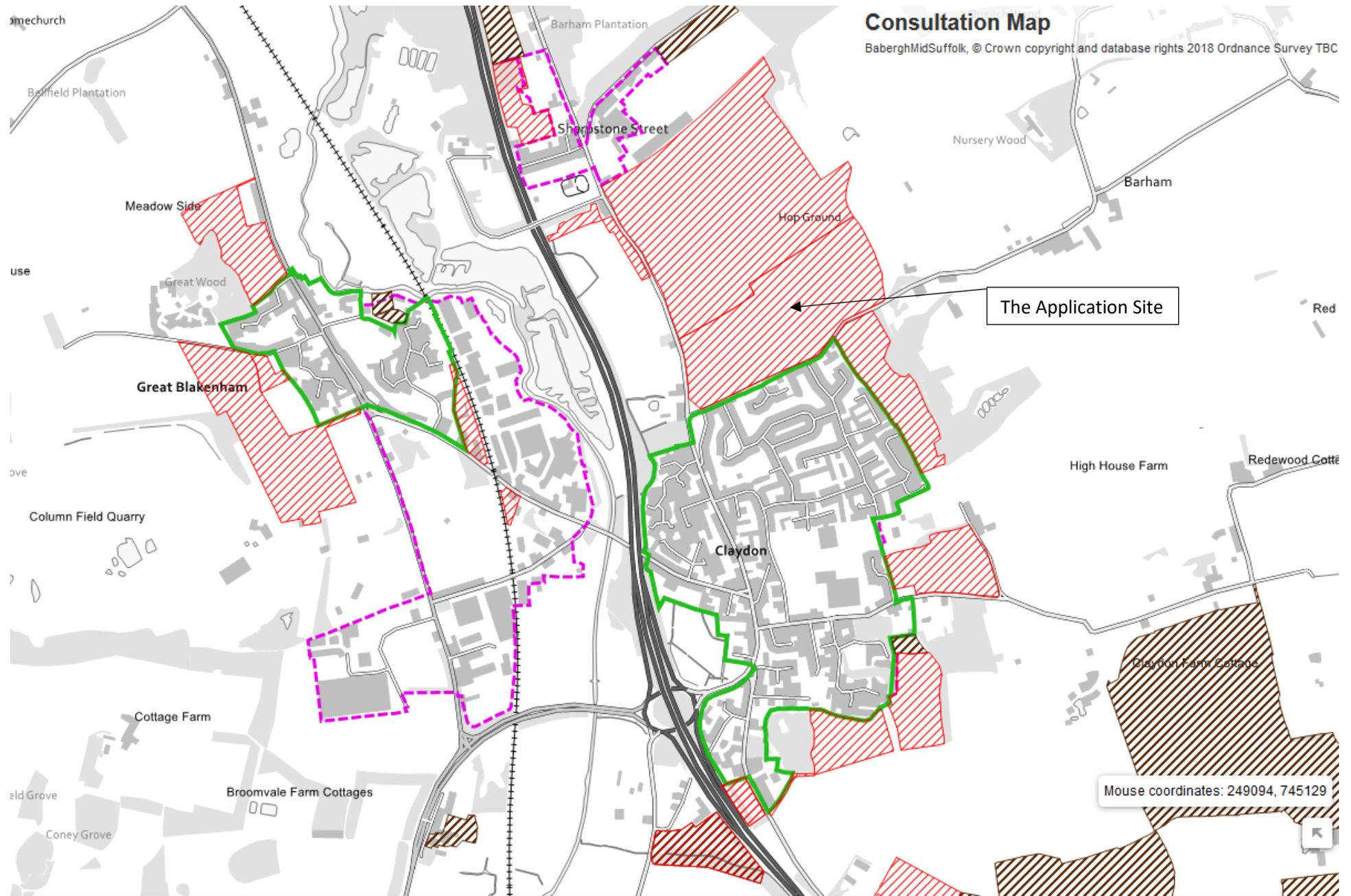
The National Planning Policy Framework (NPPF)

- 7.1 Part 4 of the National Planning Policy Framework (NPPF) is entitled “Promoting Sustainable Transport”.
- 7.2 Paragraph 29 explains that the transport system needs to be balanced in favour of sustainable transport modes giving people a real choice about how they travel.
- 7.3 Paragraph 32 explains that plans and decisions should take account of whether:
- “the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - safe and suitable access to the site can be achieved for all people; and
 - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. **Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.**” (Our emphasis)
- 7.4 There is no formal definition of “severe”. It is left as a matter of judgement for the decision-maker in each case.
- 7.5 In this case there has been no attempt to quantify the cumulative impacts of the developments coming forward in the general locality. We suggest that this assessment should not be developer led but should form part of a coordinated approach by the local planning authority and the local highway authority.
- 7.6 The applicants have taken into account 3 committed developments in Great Blakenham. The information presented in the Transport Assessment submitted in support of this planning application clearly highlights problems which are going to be exacerbated by both the current development proposals and any other future schemes in the area.
- 7.7 It is clear that the development proposals cannot safely be accommodated within the existing capacity of the local highway network. Junctions that are forecast to be

operating close to or at capacity without any additional development traffic, will be operating at overcapacity levels once additional development generated traffic is considered.

- 7.8 The additional traffic on Norwich Road/Ipswich Road is likely to alter the character of the area by moving the balance away from a “place” function and towards a “movement” function.
- 7.9 We suggest that to avoid this proposed development, and other emerging developments having a “severe” transport impact then mitigation measures are required. These may take the form of minor highway capacity improvements supplemented by measures to promote sustainable modes of travel and enhance the street scene/environment of the village.

FIGURES



Potential Residential Sites (SHELAA 2017)

Figure 1

PROPOSED RESIDENTIAL DEVELOPMENTS IN BARHAM AND CLAYDON

Land North West of Church Lane, Barham

(Planning Application Number 1856/17)

and

Land to the East of Ely Road, Claydon

(Planning Application Number DC/18/00861)

Updated Review of Transport and Access Issues

(addendum to our previous reports dated June and July 2018)

Prepared on behalf of:

Barham Parish Council

c/o Barham Parish Clerk

23 Old Rectory Close

Barham

IP6 0PY

February 2019

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1 SCOPE OF THIS TRANSPORT NOTE

1.1 In summer 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with the following two planning applications:

- a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17); and
- a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861).

1.2 This Transport Note updates our previous advice to consider any new information, or changes, that have taken place since summer 2018.

2 BACKGROUND

2.1 In June 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17). Our findings and recommendations were presented in a report dated June 2018. This report was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response on this planning application.

2.2 In July 2018 Barham Parish Council instructed THaT Consultancy to review the transport and access issues associated with a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861). Our findings and recommendations were presented in a report dated July 2018 which was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response in respect of this planning application.

2.3 Some of our findings and recommendations were site specific, others however related to the wider area and focused particularly on the cumulative traffic impact of the various development proposals that are being progressed through the planning system either by way of planning applications or via potential allocations in the emerging Local Plan.

3 WHAT HAS HAPPENED SINCE JULY 2018?

- 3.1 We understand that Suffolk County Council, as the local highway authority, shared the concerns we highlighted regarding cumulative traffic impact and subsequently invited both applicants to meet with the local planning authority and the local highway authority to discuss a cooperative approach to providing improvements to mitigate the highway impacts.
- 3.2 Barham Parish Council was not invited to take part in these discussions.
- 3.3 Despite both applicants subsequently submitting revised layouts and supporting information (which was of sufficient magnitude to necessitate both applications being re-consulted on) there does not appear to have been any significant new information submitted by either applicant in respect of highway and transport matters.
- 3.4 It is possible that investigations were undertaken that have not been incorporated into Babergh and Mid Suffolk District Councils' online planning system. If this is the case, then we would request that this information be provided to the Parish Council as a matter of urgency.

Land North West of Church Lane Barham (application number 1856/17)

- 3.5 An examination of the online planning system shows that our previous report was uploaded on 2 July 2018 and on 18 July 2018 local highway authority wrote inviting the applicant to meet with the local planning authority and local highway authority. No new information was submitted until December 2018 when the applicant submitted revised illustrative proposals.
- 3.6 As far as we are aware the applicant has not submitted any new transport related information following submission of our previous report and the subsequent letter from the LHA.
- 3.7 By letter dated 11 January 2019 the LHA submitted a revised consultation response in which they propose various highways/transport related conditions, including the requirement for a Section 278 Agreement and a Section 106 Agreement.

3.8 In this response the LHA explains that:

“Following the previous response asking for the cumulative effect of developments on junctions in Claydon, Barham, Bramford and Sproughton, meetings have taken place including all the developers for these sites. It has been concluded only this development has an impact on Station Road/Norwich Road and Church Road/Norwich Road junctions. The impact is during the peak hour in the growth year showing significant delays, these are not considered severe. To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below.” [STET]

3.9 The LHA then proposes a series of 10 conditions these encompass:

- 1 visibility splays
- 2 Road safety audit
- 3 parking and manoeuvring space
- 4 detailed design of estate roads
- 5 roads to be provided before properties occupied
- 6 surface water drainage
- 7 storage areas for refuse/recycling bins
- 8 effectively a construction management plan
- 9 landscaping
- 10 S278 *“Prior to occupation of the development, the pedestrian and cycling improvement details at Norwich Road/Station Road junction and Norwich Road/Church Road junctions at to be submitted and approved by the local planning authority. The approved scheme shall be laid out, constructed and made functionally available for use by the occupiers of the development prior to the occupation of the first dwelling and thereafter retained in the approved form for the lifetime of the development.” [STET]*

- 3.10 The Section 106 agreement encompasses a travel plan, enhancing public transport provision and improvements to the Public Rights of Way network.
- 3.11 No mention is made of any requirement to specifically mitigate the traffic impacts that will arise as a result of the proposed development.

Land to the East of Ely Road Claydon (Application Number DC/18/00861)

- 3.12 An examination of the local planning authority's online planning system shows that no further transport related information was provided by the applicant following submission of our previous report which was entered into the system on 13 August 2018.
- 3.13 By letter dated 28 November 2018 the LHA issued a revised consultation response in which they explained that:
- "Further analysis of the Barham and Claydon TAs showed the east of Ely Road application the predicted queue lengths on Station Road and Church Lane were 1 vehicle or below during the peak hour periods. Therefore, we do not consider any mitigation is required from this development."* [STET]
- 3.14 The LHA goes on to say:
- "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 and advise the conditions and contributions previously given in our response dated 21st March 2018."*
- 3.15 It is not clear from the information publicly available how the LHA established the impact of the Ely Road scheme on the Station Road and Church Lane junctions because these were not modelled in the transport statement submitted by the applicants.
- 3.16 Revised illustrative proposals and supporting documentation were submitted by the applicant in February 2019. No detailed transport/highway information was submitted with the revised proposals other than a swept path analysis to show how a refuse vehicle could turn within the road network shown in the revised illustrative site layout.

4 THAT CONSULTANCY'S ASSESSMENT OF THE CURRENT SITUATION

- 4.1 It is not clear from the information available on the local planning authority's online system what, if any, detailed investigations were undertaken to establish the cumulative transport, and particularly traffic, impact of the various development proposals in Barham and Claydon.
- 4.2 If detailed investigations have been undertaken leading to the local highway authority issuing its latest consultation responses then, in our opinion, this information should be made available for public scrutiny and, if appropriate, challenge.
- 4.3 As things stand the local highway authority has concluded that no mitigation measures are required in respect of the Ely Road scheme and some form of pedestrian and cycle mitigation measures are required in respect of the Church Lane scheme. No information is currently available to explain how the local highway authority reached these conclusions.
- 4.4 The local highway authority has previously said:
- "We have concerns regarding the number of trips created by the development [application number 1856/17] as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area." [Our emphasis] (Ref. previous LHA consultation response on application 1856/17)*
- 4.5 The Ely Road scheme will further increase traffic on the same road network.
- 4.6 Given the serious transport and highway related concerns raised by the Parish Council and local residents, and given the LHA's previous documented concerns, we consider that the cumulative impact of the various development proposals should be evaluated in an open, and transparent, manner to ensure that the decision-making process is fair and robust.
- 4.7 Based upon the information currently available to us we cannot conclude that the cumulative impact of the various development proposals has been satisfactorily addressed.

- 4.8 In our opinion, based upon information currently available to us, we consider it very important that the local planning authority and the local highway authority address the issue of the cumulative traffic impact of the development proposals in the area. Failure to do so at this stage will almost certainly mean that traffic conditions on the local highway network will worsen significantly over the next few years.
- 4.9 The Transport Assessment submitted in respect of the Church Lane scheme (application number 1856/17) demonstrated that parts of the local highway network (particularly junctions in the village centre) will be operating at, or over, capacity by 2022 without any additional development. The additional traffic associated with the proposed development of up to 300 dwellings would significantly worsen the situation. The Ely Road proposals were not taken into consideration in this analysis but will add additional traffic onto the same road network. It is therefore reasonable to assume that should the Ely Road scheme be approved then the traffic situation would be even worse than that forecast in the Transport Assessment submitted in respect of the proposed development at Church Lane.
- 4.10 The local highway network is currently operating at, or close to, capacity. At present congestion and queueing are a feature of the local highway network, but are not at a level where we would expect the local highway authority to take action given the numerous conflicting demands on the public purse.
- 4.11 However, once the traffic carrying capacity of a highway network is exceeded then congestion and traffic queues increase rapidly. This inevitably leads to delay, frustration and inconvenience for all highway users. Some drivers will start to look for alternative, and perhaps unsuitable, routes to avoid congestion. Some drivers will also start to take unnecessary risks (e.g. forcing their way out of junctions) leading to a detrimental impact on highway safety.
- 4.12 The “knife edge” situation on the local highway network is clearly demonstrated in the traffic modelling presented in the Transport Assessment submitted in support of the Church Lane application. As part of this Transport Assessment the operation of the Claydon Church Lane/Ipswich Road priority junction was modelled. The results of this analysis are summarised in paragraphs 8.18-8.27 of the Transport Assessment report. The output from the computer modelling is presented at Appendix N of the Transport Assessment.

- 4.13 By reference to Figure Number 6.2 of the Transport Assessment we see that the proposed Church Lane development will only result in 1 additional vehicle movement on Claydon Church Lane in the AM peak hour, this being a single vehicle turning left into Claydon Church Lane from the north.
- 4.14 Table 8.6 of the Transport Assessment summarises the output of the computer modelling of this junction in 2022 both with, and without, the additional traffic forecast to be generated by the Church Lane development.
- 4.15 It will be noted that in the AM peak hour the turning movements out of Claydon Church Lane are forecast to be operating just above capacity (the actual figures being 102% and 104% of capacity) without the Church Lane development. However, once the additional traffic associated with the Church Lane development is taken into account then the queues on Claydon Church Lane double in length and the turning movements out of Claydon Church Lane are forecast to operate at between 126% and 129% of capacity.
- 4.16 In Table 8.7 of the Transport Assessment the applicants break down the hourly results presented in Table 8.6 into 15 minute intervals and argue that the capacity issues are likely to be concentrated into a single 15 minute period. In this table they present the RFC (ratio of flow to capacity) and queue length for the left turn out of Claydon Church Lane and the right turn out of Claydon Church Lane is presented in Appendix N of the transport assessment.
- 4.17 Whilst the RFC and queue length are very important parameters when assessing the operation of the junction it is also useful to consider the average delay per vehicle because this clearly demonstrates just how sensitive the operation of a junction can be to relatively minor changes in traffic flow when the junction is operating at or above capacity. In Table 1 below we have presented the delay per vehicle as taken from Appendix N of the applicants' Transport Assessment.

	Left turn out of Claydon Church Lane			Right turn out of Claydon Church Lane		
	Without Dev	With Dev	Increase	Without Dev	With Dev	Increase
08:00 – 08:15	16.5	23.2	6.7	37.3	60.7	23.4
08:15 – 08:30	88.2	187.1	98.9	189.8	291.7	101.9
08:30 – 08:45	40.3	221.4	181.1	67.6	316.2	248.6
08:45 – 09:00	23.2	90.1	66.9	32.9	152.5	119.6

Table 1 Delay (s) at the Claydon Church Lane Junction with and without the Proposed 300 Dwellings
2022 AM peak hour
(Information Extracted from the Applicant’s Transport Assessment)

- 4.18 It will be noted that the additional traffic associated with the proposed development of 300 dwellings will result in significant increases (typical increases of approximately 1-4 minutes) in the length of time it takes to turn out of Claydon Church Lane.
- 4.19 It should also be noted that whilst these significant increases in delay are as a result of the additional traffic associated with the proposed development of 300 dwellings the delays will not be experienced by development generated traffic, but rather by existing traffic turning into Norwich Road/Ipswich Road. The proposed development of 300 dwellings only results in 1 additional vehicle movement on Claydon Church Lane and that vehicle is turning into Claydon Church Lane not out of Claydon Church Lane.
- 4.20 Whilst the LHA’s requirements that the Church Lane development should fund improved facilities for pedestrians and cyclists it is not clear how, or if, such improvements will address the traffic issues highlighted in the applicant’s transport assessment.
- 4.21 Although we have focused on the transport assessment submitted in support of the Church Lane proposals this is only because it represents the most detailed information currently available to us. The Ely Road scheme will also add additional traffic onto the local highway network and exacerbate the problems highlighted above.
- 4.22 We therefore conclude that the fundamental issue identified in our previous two reports, this being cumulative traffic impact, has not been satisfactorily addressed.

Site Specific Concerns

4.23 In our previous reports we also raised a series of site-specific concerns. It does not appear, on the basis of information currently available to us, that these have been adequately addressed. For the sake of convenience these concerns and/or recommendations are summarised below.

Land to the East of Ely Road

4.24 We note that the applicants are proposing a carriageway width restriction at the point where the proposed site access road meets Ely Road. This will be created by installing a 1 m wide buildout on each side of the carriageway. The buildout on the southern side of the carriageway will also act as a footway.

4.25 Based upon the information currently available to us it would appear that this arrangement is proposed because the applicants do not control sufficient land to provide a conventional highways layout at the point where the proposed new site access road meets the end of Ely Road.

4.26 The recommended minimum footway width is 2.0 m. This is what is proposed within the application site. A width of 1.0 m will enable an adult to walk on their own along this stretch of footway, but it is not wide enough to enable an adult to walk with a child by their side.

4.27 To address this concern the applicants intend providing an uncontrolled pedestrian crossing either side of the width restriction. The expectation, presumably, is that pedestrians walking along the south side of Ely Road/site access road will cross to the north side at the width restriction.

4.28 We think this is an unrealistic expectation, and that the reality is likely to be that pedestrians will step into the carriageway.

4.29 Given that the main pedestrian desire line is likely to be between the application site and Thornhill Road (south) i.e. the route to/from the schools and village centre, we suggest that the proposed site access arrangements are reviewed to ensure that the safety of vulnerable road users is not prejudiced.

4.30 Paragraph 4.5 of the Transport Statement states:

“...the proposed buildouts will also function as a traffic calming feature and entrance into the proposed 20 mph zone.”

- 4.31 As well as implementing a 20 mph zone within the site we suggest that it would be beneficial in highway safety terms to introduce a 20 mph speed limit on Ely Road and Thornhill Road as well. This will serve to constrain vehicle speeds on an important route to/from the nearby schools. The 20 mph speed limit could, of course, be extended to include the wider residential area.
- 4.32 We note that the automatic traffic count surveys undertaken by the applicant and presented in the Transport Statement show average vehicle speeds on Thornhill Road to be 26 mph, and the 85th percentile speed to be 32 mph. The speed limit is 30 mph.
- 4.33 The maximum design speed for residential streets should normally be 20 mph. Clearly observed vehicle speeds on Thornhill Road are well above this figure. However, given the width of Thornhill Road, its relatively straight alignment and excellent forward visibility, the observed speeds are what would be expected.
- 4.34 Thornhill Road is an important route to/from the schools to the south and is used by pedestrians, cyclists and motorists.
- 4.35 Given the increased use of Thornhill Road that will result from the proposed new residential developments in the area, together with the increases that will result from the expansion at the primary school, we consider it appropriate to implement measures now to make the route safer and, more attractive, to pedestrians and cyclists.

Church Lane, Barham

- 4.36 We previously recommended that the development proposals should be subject to a Stage 1 Road Safety Audit (RSA) before planning permission is granted. A Stage 1 RSA is normally undertaken at the planning stage.
- 4.37 We suggested that this RSA should cover the following:
- the new and modified sections of highway infrastructure proposed as part of the development scheme
 - the sections of the existing highway network that are or will be operating close to, or above, capacity

- the access routes between the application site and the existing schools
- the access routes between the application site and the village centre
- the route along Barham Church Lane between the application site and the northern outskirts of Ipswich

4.38 We note that in its latest consultation response dated 11 January 2019 the LHA recommended that a condition be applied stating:

“The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied/open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.”

4.39 The proposed development has highway impacts that extend beyond the proposed site access and associated spine road. To ensure that highway safety issues are not compromised should the LPA be minded to approve this application, we consider it important that the Stage 1 RSA be undertaken before permission is granted and that the scope of the RSA should encompass the items set out above and not just the proposed site access and spine road design.

FAO: Jo Hobbs

Babergh and Mid Suffolk District Councils
Endeavour House
8 Russel Road
Ipswich
IP1 2BX

BY EMAIL ONLY

25th January 2019

Dear Ms Hobbs,

Correspondence on behalf of Barham Parish Council in relation to outline application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure, reference 1856/17.

Planning and Design Group ('P&DG') write in relation to the above outline application, reference 1856/7, on behalf Barham Parish Council ('The Parish Council'). This application has been pending decision since May 2017 and The Parish Council have communicated regularly throughout the application process, raising valid concerns and points of objection. This letter seeks to reiterate the Parish Council's objection to this application following a review of the revised plans submitted by the applicant in December 2018 and as Mid Suffolk District Council ('MSDC') look to move toward a recommendation on the application in early 2019.

As a general principle, The Parish Council seek to engage positively with local development proposals where they are proportionate and sympathetic to settlement character. However, this outline application is considered an exception to this principle by virtue of its countryside location, excessive scale and weight of cumulative negative technical impacts. These factors have generated opposition from The Parish Council and the local community. Indeed, by way of wider context, 61 of the 66 public comments registered against this application to date have raised significant points of objection. This indicates the extent of opposition to this

planning application, not only from The Parish Council but also from members of the local community.

This letter highlights the key areas of concern and objection raised by The Parish Council. Serious concerns are raised in relation to the principle of development. Technical matters will be addressed in more detail below, with locational impacts and issues of scale addressed in the first instance.

Principle of Development (Location and Scale)

Notwithstanding the absence of five-year housing land supply at the time of submission, in May 2017, the proposed application site falls outside of Claydon's northern settlement boundary (as defined in Proposal 1 of the 'saved' Mid Suffolk Local Plan 1998) and therefore into a countryside location. The local planning policy framework seeks to restrict residential development in the countryside, specifically through policy H7 of the Local Plan which states: *'In the interests of protecting the existing character and appearance of the countryside, outside settlement boundaries there will be strict control over proposals for new housing.'*

From the Mid Suffolk Local Plan, new residential development in the countryside is tied to more exceptional circumstances, such as the sensitive conversion of buildings or replacement dwellings, which are far more modest in scale. The emphasis of relevant planning policy is therefore to protect the intrinsic qualities of the countryside. This is reinforced in policy CS2 of the adopted Core Strategy 2008, which restricts countryside development to defined categories or uses. The policy explicitly excludes extensive residential development in the interests of preserving the countryside, which is intended to be *'protected for its own sake'*.

In light of this, the proposal to introduce a new residential scheme amounting to some 270 dwellings in a countryside location is considered entirely inappropriate by The Parish Council. The scale of proposed development will have a severe negative impact on both the character and appearance of the countryside to the north of Claydon. Acting to the considerable social and environmental detriment of the local area.

The relative status of planning policy has been challenged by the applicant because MSDC could not previously demonstrate a five-year housing land supply. This context has however shifted somewhat and as at July 2018, MSDC have confirmed that a deliverable five-year housing land supply is now in place. A healthy trajectory of some 4,041 dwellings is evidenced and, even where a 20% buffer is applied to the upward 2017 Strategic Housing Market Assessment ('SHMA') figures, around 6.4

years of housing land supply can be demonstrated. This acts to significantly diminish any associated principle of development for this proposal. The site is countryside and relevant planning policies can be given full weight, preventing new residential development in this location. The proposal represents an unsustainable location for residential development, as proposed.

It is our considered view that the recently published standard methodology for calculating local housing need, which was introduced through the 2018 National Planning Policy Framework ('NPPF'), cannot be appropriately applied at this point in time. In light of the Government's recent technical consultation on the local housing need methodology, final Housing Delivery Test results have not been published. MSDC's current five-year housing land supply figures are subsequently based on recent housing need evidence in the SHMA and there appears to be few reasonable alternatives. Indeed, in relation to the 2017 SHMA an appropriate 'policy-on' housing target of 452 per annum is established for the Mid Suffolk area which is based on positive joint co-operation between local authorities within the wider Ipswich and Waveney Housing Market Area. Within this context it is apparent that continuing to use MSDC's current five-year housing land supply position reflects the optimum approach and offers an appropriate position for planning decisions.

Furthermore, this application is not considered by The Parish Council to represent a sequentially preferable location for housing development. Whilst the proportionate re-use of previously developed land for infill may be appropriate given Claydon's role with Great Blakeham as 'Key Service Centres' in the Core Strategy. This application is contrary to this approach, proposing to remove a very large area of greenfield land in the countryside.

The proposals fail to meet the principles of Core Strategy policy CS1 which, within the supporting text, states that '*care must be taken to ensure that development is directed to locations where it will have the greatest benefits for rural sustainability*'. As such full market housing development is not considered suitable for either land allocation or speculative planning applications in Key Service Centres. Only infill housing development within settlement boundaries is considered appropriate for relevant settlements such as Claydon.

Policy CS7 of the Core Strategy establishes a target that 50% of all dwellings should be delivered on previously developed ('brownfield') land. This positively acknowledges the importance of utilising brownfield land in the first instance in order to effectively preserve the valued countryside of Mid Suffolk. The NPPF reinforces this planning approach, stating that decision making should '*give*

substantial weight to the value of using suitable brownfield land within settlements for homes. The principle of greenfield land development is therefore clearly diminished in favour of the re-use of previously developed land, something this application fails entirely to achieve.

Additionally, policy FC2 of the 2012 Core Strategy Focused Review seeks to distribute 170 homes to the Ipswich Policy Area, of which Claydon forms a part, on 100% brownfield land. In Key Service Centres of the target for 750 homes 40% are also indicated for brownfield land, with the remainder of new homes allocated through sustainable urban extensions. This is as opposed to the piecemeal loss of the countryside. It is also important to note the extent of committed development in the immediate area. For example, some 426 new homes have already been consented and are under construction in the adjacent settlement of Great Blakenham (ref: 3310/14) on the brownfield former Masons Cement Work site. The consent will act alone to meet, if not exceed, housing need in the immediate area of Mid Suffolk. Therefore, the additional release of countryside land for development is considered entirely excessive.

Within this context, and in particular the very clear planning policy position creating a sequential preference for the re-use of brownfield land, The Parish Council again question the principle of development and raise objection on these grounds. Fundamentally, the outline proposals fail to deliver development in sustainable location, acting to neither conserve or enhance the local character of Claydon and the surrounding countryside. Accordingly, the application should be refused.

The Parish Council also wish to raise significant concern, not only in relation to the scale of this planning application but also the prospect of a much wider loss of countryside between Claydon and the built-up area around Sandy Lane. To the north of this application site is land identified for further development potential. In the most recent Land Availability Assessment ('LAA') both sites are referred to as SS0076 and SS0551 respectively. The Parish Council feel that if this application for some 270 homes is consented it will establish a very dangerous principle for further development. As such it would be reasonable to expect subsequent future planning applications proposing development of land to the north of this application site. If all land was developed this would amount to the disproportionate introduction of some 600 new homes (effectively doubling the size of Claydon) and completely remove the countryside break between Claydon and the built-up area around Sandy Lane. This does not reflect a sustainable or a sound planning approach. Therefore,

The Parish Council restate their objection and would like to reiterate the risks of consenting this application to MSDC.

Principle of Development (Technical Matters)

Additionally, The Parish Council wish to object to this planning application given the high level of doubt over technical and scheme specific matters. The extent of the doubt surrounding these matters cumulatively indicate that the proposals are entirely unsustainable and risk demonstrable social and environmental harm. Therefore, The Parish Council consider these matters further grounds for refusal.

Indeed, as of March 2018 MSDC officers were minded to refuse this application on technical grounds. This was particularly in relation to the quality of ecological, landscape, archaeological, heritage and highway evidence. Subsequently, the application was deferred and the scheme revised however, The Parish Council maintain that some matters have not and will unlikely be resolved adequately to justify a recommendation for approval.

In relation to highway and access matters, The Parish Council would like to draw attention again to the technical report prepared by THaT Consultancy in June 2018 entitled a 'Review of Transport Issues'. The technical matters of this report will not be duplicated however, the conclusions stated that the existing highway network was not considered adequate to accommodate the cumulative impact of this and wider committed / proposed development in the locality of Mid Suffolk. Therefore, presenting a very real risk that the highway impact of this and neighbouring schemes is 'severe' and as such, in excess of the NPPF tolerance threshold. Further capacity testing and a Road Safety Audit (during the application period) were also recommended by the THaT Consultancy report.

These concerns were reiterated by Suffolk County Council ('SCC') in a letter dated the 18th July 2018. This letter listed a range of local, cumulative development proposals and raised the prospect of severe traffic impacts on local junction capacity, also stating:

'With the increase in congestion, the concern is traffic may divert onto other routes which are unsuitable for the increase in traffic. Also, pedestrian safety in these built up areas could be compromised where they are trying to cross roads between queuing cars so not visible to other drivers.'

The additional traffic generated by the cumulative effect from the developments at these junctions show an increase in queuing and delays for

all users therefore, we consider a co-operative approach to give an opportunity to provide improvements to mitigate against the significant impacts. We would like to invite applicants to attend a meeting with the Local Planning Authority and ourselves to discuss further options.'

Despite the calls of further evidence throughout the summer of 2018 from both the 'Review of Transport Issues' report and SCC's development management engineers there appears to have been no further progress relating to the matter. Despite the risks raised, upon all reasonable review of MSDC's electronic planning records no further evidence appears to have been submitted by the applicant to mitigate matters. Accordingly, The Parish Council maintain their view on transport and highway matters, which justify objection to this planning application. As a minimum, the applicant's Transport Assessment, which is approaching two years old, should be subject to a significant review in co-operation with all relevant stakeholders in order to seek resolution on this key outstanding technical matter.

Further, whilst the revised outline plans for this application include greater provision for St Mary and St Peters Church (Grade I Listed Building), The Parish Council wish to reiterate their concern relating to the potentially adverse impact caused to the setting of this considerably important heritage asset. The setting of the Church will be irreparably marked by an increased development footprint as a result of the proposed development and the wider countryside context of the building diminished. This represents a significant risk to the heritage asset, alongside impacts on the views relating to Shrubland Hall, which require serious consideration by MSDC. In their response dated the 15th August 2018, Historic England share similar concerns and SCC's archaeological team still seek further information and propose significant draft conditions. Therefore, The Parish Council object on the technical matter of heritage and as a minimum seek further evidence that provides assurance over the protection of St Mary and St Peters Church's historic setting and a full assessment of harm weighed against claimed public benefits proposed by the scheme.

Further still, The Parish Council wish to highlight concern in relation to the land proposed for use as a school site and GP surgery within the revised outline scheme. Although land is indicated as being reserved for the provision of a pre-school and primary school, there appears to be little in the way assurances that this element of social infrastructure will be delivered. Suffolk County Council ('SCC'), in their response dated the 15th May 2018, indicate that there is future need for primary school places generated beyond the planned 25% expansion of Claydon Primary

School. As a result, there will be a surplus need for primary places generated by this development proposal. The Parish Council question the proposed reservation of land for new school provision and are concerned that this will not be delivered. The uplift in value associated with a future residential use would likely outweigh education CIL or S.106 contributions. It is also unusual for the outline proposals to contain no indication of how a pre-school and primary school may look and operate on the site (even in block plan form), this information is requested as a minimum and further joint work with SCC requested to secure delivery proposals. Similar concerns are raised in relation to the proposed land for a GP surgery. This is with particular questions raised over the absence of firm delivery proposals, effective partnership working by the applicant with the NHS and the lack of consideration given to wider plans for GP provision in this locality of Mid Suffolk. The Parish Council therefore seek further clarity on this matter.

Summary

In summary, The Parish Council maintain their objection this outline application. The principle for development on this site is severely diminished by virtue of its location in the countryside, excessive scale and weight of cumulative negative technical impacts. The Parish Council consider that there are significant planning policy grounds on which to refuse this application and trust that this letter, alongside all related prior communication from The Parish Council, is considered very seriously by MSDC.

Any further dialogue is particularly encouraged as The Parish Council wish to seek to work positively with MSDC and all relevant stakeholders in respect of the application continuing towards determination.

Yours Sincerely

**Andrew Grayson BA(Hons) MA MRTPI
Senior Town Planner**

PROPOSED RESIDENTIAL DEVELOPMENTS IN BARHAM AND CLAYDON

Land North West of Church Lane, Barham

(Planning Application Number 1856/17)

and

Land to the East of Ely Road, Claydon

(Planning Application Number DC/18/00861)

Updated Review of Transport and Access Issues

(addendum to our previous reports dated June and July 2018)

Prepared on behalf of:

Barham Parish Council

c/o Barham Parish Clerk

23 Old Rectory Close

Barham

IP6 0PY

February 2019

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1 SCOPE OF THIS TRANSPORT NOTE

1.1 In summer 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with the following two planning applications:

- a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17); and
- a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861).

1.2 This Transport Note updates our previous advice to consider any new information, or changes, that have taken place since summer 2018.

2 BACKGROUND

2.1 In June 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17). Our findings and recommendations were presented in a report dated June 2018. This report was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response on this planning application.

2.2 In July 2018 Barham Parish Council instructed THaT Consultancy to review the transport and access issues associated with a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861). Our findings and recommendations were presented in a report dated July 2018 which was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response in respect of this planning application.

2.3 Some of our findings and recommendations were site specific, others however related to the wider area and focused particularly on the cumulative traffic impact of the various development proposals that are being progressed through the planning system either by way of planning applications or via potential allocations in the emerging Local Plan.

3 WHAT HAS HAPPENED SINCE JULY 2018?

- 3.1 We understand that Suffolk County Council, as the local highway authority, shared the concerns we highlighted regarding cumulative traffic impact and subsequently invited both applicants to meet with the local planning authority and the local highway authority to discuss a cooperative approach to providing improvements to mitigate the highway impacts.
- 3.2 Barham Parish Council was not invited to take part in these discussions.
- 3.3 Despite both applicants subsequently submitting revised layouts and supporting information (which was of sufficient magnitude to necessitate both applications being re-consulted on) there does not appear to have been any significant new information submitted by either applicant in respect of highway and transport matters.
- 3.4 It is possible that investigations were undertaken that have not been incorporated into Babergh and Mid Suffolk District Councils' online planning system. If this is the case, then we would request that this information be provided to the Parish Council as a matter of urgency.

Land North West of Church Lane Barham (application number 1856/17)

- 3.5 An examination of the online planning system shows that our previous report was uploaded on 2 July 2018 and on 18 July 2018 local highway authority wrote inviting the applicant to meet with the local planning authority and local highway authority. No new information was submitted until December 2018 when the applicant submitted revised illustrative proposals.
- 3.6 As far as we are aware the applicant has not submitted any new transport related information following submission of our previous report and the subsequent letter from the LHA.
- 3.7 By letter dated 11 January 2019 the LHA submitted a revised consultation response in which they propose various highways/transport related conditions, including the requirement for a Section 278 Agreement and a Section 106 Agreement.

3.8 In this response the LHA explains that:

“Following the previous response asking for the cumulative effect of developments on junctions in Claydon, Barham, Bramford and Sproughton, meetings have taken place including all the developers for these sites. It has been concluded only this development has an impact on Station Road/Norwich Road and Church Road/Norwich Road junctions. The impact is during the peak hour in the growth year showing significant delays, these are not considered severe. To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below.” [STET]

3.9 The LHA then proposes a series of 10 conditions these encompass:

- 1 visibility splays
- 2 Road safety audit
- 3 parking and manoeuvring space
- 4 detailed design of estate roads
- 5 roads to be provided before properties occupied
- 6 surface water drainage
- 7 storage areas for refuse/recycling bins
- 8 effectively a construction management plan
- 9 landscaping
- 10 S278 *“Prior to occupation of the development, the pedestrian and cycling improvement details at Norwich Road/Station Road junction and Norwich Road/Church Road junctions at to be submitted and approved by the local planning authority. The approved scheme shall be laid out, constructed and made functionally available for use by the occupiers of the development prior to the occupation of the first dwelling and thereafter retained in the approved form for the lifetime of the development.” [STET]*

- 3.10 The Section 106 agreement encompasses a travel plan, enhancing public transport provision and improvements to the Public Rights of Way network.
- 3.11 No mention is made of any requirement to specifically mitigate the traffic impacts that will arise as a result of the proposed development.

Land to the East of Ely Road Claydon (Application Number DC/18/00861)

- 3.12 An examination of the local planning authority's online planning system shows that no further transport related information was provided by the applicant following submission of our previous report which was entered into the system on 13 August 2018.
- 3.13 By letter dated 28 November 2018 the LHA issued a revised consultation response in which they explained that:
- "Further analysis of the Barham and Claydon TAs showed the east of Ely Road application the predicted queue lengths on Station Road and Church Lane were 1 vehicle or below during the peak hour periods. Therefore, we do not consider any mitigation is required from this development."* [STET]
- 3.14 The LHA goes on to say:
- "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 and advise the conditions and contributions previously given in our response dated 21st March 2018."*
- 3.15 It is not clear from the information publicly available how the LHA established the impact of the Ely Road scheme on the Station Road and Church Lane junctions because these were not modelled in the transport statement submitted by the applicants.
- 3.16 Revised illustrative proposals and supporting documentation were submitted by the applicant in February 2019. No detailed transport/highway information was submitted with the revised proposals other than a swept path analysis to show how a refuse vehicle could turn within the road network shown in the revised illustrative site layout.

4 THAT CONSULTANCY'S ASSESSMENT OF THE CURRENT SITUATION

- 4.1 It is not clear from the information available on the local planning authority's online system what, if any, detailed investigations were undertaken to establish the cumulative transport, and particularly traffic, impact of the various development proposals in Barham and Claydon.
- 4.2 If detailed investigations have been undertaken leading to the local highway authority issuing its latest consultation responses then, in our opinion, this information should be made available for public scrutiny and, if appropriate, challenge.
- 4.3 As things stand the local highway authority has concluded that no mitigation measures are required in respect of the Ely Road scheme and some form of pedestrian and cycle mitigation measures are required in respect of the Church Lane scheme. No information is currently available to explain how the local highway authority reached these conclusions.
- 4.4 The local highway authority has previously said:
- "We have concerns regarding the number of trips created by the development [application number 1856/17] as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area." [Our emphasis] (Ref. previous LHA consultation response on application 1856/17)*
- 4.5 The Ely Road scheme will further increase traffic on the same road network.
- 4.6 Given the serious transport and highway related concerns raised by the Parish Council and local residents, and given the LHA's previous documented concerns, we consider that the cumulative impact of the various development proposals should be evaluated in an open, and transparent, manner to ensure that the decision-making process is fair and robust.
- 4.7 Based upon the information currently available to us we cannot conclude that the cumulative impact of the various development proposals has been satisfactorily addressed.

- 4.8 In our opinion, based upon information currently available to us, we consider it very important that the local planning authority and the local highway authority address the issue of the cumulative traffic impact of the development proposals in the area. Failure to do so at this stage will almost certainly mean that traffic conditions on the local highway network will worsen significantly over the next few years.
- 4.9 The Transport Assessment submitted in respect of the Church Lane scheme (application number 1856/17) demonstrated that parts of the local highway network (particularly junctions in the village centre) will be operating at, or over, capacity by 2022 without any additional development. The additional traffic associated with the proposed development of up to 300 dwellings would significantly worsen the situation. The Ely Road proposals were not taken into consideration in this analysis but will add additional traffic onto the same road network. It is therefore reasonable to assume that should the Ely Road scheme be approved then the traffic situation would be even worse than that forecast in the Transport Assessment submitted in respect of the proposed development at Church Lane.
- 4.10 The local highway network is currently operating at, or close to, capacity. At present congestion and queueing are a feature of the local highway network, but are not at a level where we would expect the local highway authority to take action given the numerous conflicting demands on the public purse.
- 4.11 However, once the traffic carrying capacity of a highway network is exceeded then congestion and traffic queues increase rapidly. This inevitably leads to delay, frustration and inconvenience for all highway users. Some drivers will start to look for alternative, and perhaps unsuitable, routes to avoid congestion. Some drivers will also start to take unnecessary risks (e.g. forcing their way out of junctions) leading to a detrimental impact on highway safety.
- 4.12 The “knife edge” situation on the local highway network is clearly demonstrated in the traffic modelling presented in the Transport Assessment submitted in support of the Church Lane application. As part of this Transport Assessment the operation of the Claydon Church Lane/Ipswich Road priority junction was modelled. The results of this analysis are summarised in paragraphs 8.18-8.27 of the Transport Assessment report. The output from the computer modelling is presented at Appendix N of the Transport Assessment.

- 4.13 By reference to Figure Number 6.2 of the Transport Assessment we see that the proposed Church Lane development will only result in 1 additional vehicle movement on Claydon Church Lane in the AM peak hour, this being a single vehicle turning left into Claydon Church Lane from the north.
- 4.14 Table 8.6 of the Transport Assessment summarises the output of the computer modelling of this junction in 2022 both with, and without, the additional traffic forecast to be generated by the Church Lane development.
- 4.15 It will be noted that in the AM peak hour the turning movements out of Claydon Church Lane are forecast to be operating just above capacity (the actual figures being 102% and 104% of capacity) without the Church Lane development. However, once the additional traffic associated with the Church Lane development is taken into account then the queues on Claydon Church Lane double in length and the turning movements out of Claydon Church Lane are forecast to operate at between 126% and 129% of capacity.
- 4.16 In Table 8.7 of the Transport Assessment the applicants break down the hourly results presented in Table 8.6 into 15 minute intervals and argue that the capacity issues are likely to be concentrated into a single 15 minute period. In this table they present the RFC (ratio of flow to capacity) and queue length for the left turn out of Claydon Church Lane and the right turn out of Claydon Church Lane is presented in Appendix N of the transport assessment.
- 4.17 Whilst the RFC and queue length are very important parameters when assessing the operation of the junction it is also useful to consider the average delay per vehicle because this clearly demonstrates just how sensitive the operation of a junction can be to relatively minor changes in traffic flow when the junction is operating at or above capacity. In Table 1 below we have presented the delay per vehicle as taken from Appendix N of the applicants' Transport Assessment.

	Left turn out of Claydon Church Lane			Right turn out of Claydon Church Lane		
	Without Dev	With Dev	Increase	Without Dev	With Dev	Increase
08:00 – 08:15	16.5	23.2	6.7	37.3	60.7	23.4
08:15 – 08:30	88.2	187.1	98.9	189.8	291.7	101.9
08:30 – 08:45	40.3	221.4	181.1	67.6	316.2	248.6
08:45 – 09:00	23.2	90.1	66.9	32.9	152.5	119.6

Table 1 Delay (s) at the Claydon Church Lane Junction with and without the Proposed 300 Dwellings
2022 AM peak hour
(Information Extracted from the Applicant’s Transport Assessment)

- 4.18 It will be noted that the additional traffic associated with the proposed development of 300 dwellings will result in significant increases (typical increases of approximately 1-4 minutes) in the length of time it takes to turn out of Claydon Church Lane.
- 4.19 It should also be noted that whilst these significant increases in delay are as a result of the additional traffic associated with the proposed development of 300 dwellings the delays will not be experienced by development generated traffic, but rather by existing traffic turning into Norwich Road/Ipswich Road. The proposed development of 300 dwellings only results in 1 additional vehicle movement on Claydon Church Lane and that vehicle is turning into Claydon Church Lane not out of Claydon Church Lane.
- 4.20 Whilst the LHA’s requirements that the Church Lane development should fund improved facilities for pedestrians and cyclists it is not clear how, or if, such improvements will address the traffic issues highlighted in the applicant’s transport assessment.
- 4.21 Although we have focused on the transport assessment submitted in support of the Church Lane proposals this is only because it represents the most detailed information currently available to us. The Ely Road scheme will also add additional traffic onto the local highway network and exacerbate the problems highlighted above.
- 4.22 We therefore conclude that the fundamental issue identified in our previous two reports, this being cumulative traffic impact, has not been satisfactorily addressed.

Site Specific Concerns

4.23 In our previous reports we also raised a series of site-specific concerns. It does not appear, on the basis of information currently available to us, that these have been adequately addressed. For the sake of convenience these concerns and/or recommendations are summarised below.

Land to the East of Ely Road

4.24 We note that the applicants are proposing a carriageway width restriction at the point where the proposed site access road meets Ely Road. This will be created by installing a 1 m wide buildout on each side of the carriageway. The buildout on the southern side of the carriageway will also act as a footway.

4.25 Based upon the information currently available to us it would appear that this arrangement is proposed because the applicants do not control sufficient land to provide a conventional highways layout at the point where the proposed new site access road meets the end of Ely Road.

4.26 The recommended minimum footway width is 2.0 m. This is what is proposed within the application site. A width of 1.0 m will enable an adult to walk on their own along this stretch of footway, but it is not wide enough to enable an adult to walk with a child by their side.

4.27 To address this concern the applicants intend providing an uncontrolled pedestrian crossing either side of the width restriction. The expectation, presumably, is that pedestrians walking along the south side of Ely Road/site access road will cross to the north side at the width restriction.

4.28 We think this is an unrealistic expectation, and that the reality is likely to be that pedestrians will step into the carriageway.

4.29 Given that the main pedestrian desire line is likely to be between the application site and Thornhill Road (south) i.e. the route to/from the schools and village centre, we suggest that the proposed site access arrangements are reviewed to ensure that the safety of vulnerable road users is not prejudiced.

4.30 Paragraph 4.5 of the Transport Statement states:

“...the proposed buildouts will also function as a traffic calming feature and entrance into the proposed 20 mph zone.”

- 4.31 As well as implementing a 20 mph zone within the site we suggest that it would be beneficial in highway safety terms to introduce a 20 mph speed limit on Ely Road and Thornhill Road as well. This will serve to constrain vehicle speeds on an important route to/from the nearby schools. The 20 mph speed limit could, of course, be extended to include the wider residential area.
- 4.32 We note that the automatic traffic count surveys undertaken by the applicant and presented in the Transport Statement show average vehicle speeds on Thornhill Road to be 26 mph, and the 85th percentile speed to be 32 mph. The speed limit is 30 mph.
- 4.33 The maximum design speed for residential streets should normally be 20 mph. Clearly observed vehicle speeds on Thornhill Road are well above this figure. However, given the width of Thornhill Road, its relatively straight alignment and excellent forward visibility, the observed speeds are what would be expected.
- 4.34 Thornhill Road is an important route to/from the schools to the south and is used by pedestrians, cyclists and motorists.
- 4.35 Given the increased use of Thornhill Road that will result from the proposed new residential developments in the area, together with the increases that will result from the expansion at the primary school, we consider it appropriate to implement measures now to make the route safer and, more attractive, to pedestrians and cyclists.

Church Lane, Barham

- 4.36 We previously recommended that the development proposals should be subject to a Stage 1 Road Safety Audit (RSA) before planning permission is granted. A Stage 1 RSA is normally undertaken at the planning stage.
- 4.37 We suggested that this RSA should cover the following:
- the new and modified sections of highway infrastructure proposed as part of the development scheme
 - the sections of the existing highway network that are or will be operating close to, or above, capacity

- the access routes between the application site and the existing schools
- the access routes between the application site and the village centre
- the route along Barham Church Lane between the application site and the northern outskirts of Ipswich

4.38 We note that in its latest consultation response dated 11 January 2019 the LHA recommended that a condition be applied stating:

“The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied/open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.”

4.39 The proposed development has highway impacts that extend beyond the proposed site access and associated spine road. To ensure that highway safety issues are not compromised should the LPA be minded to approve this application, we consider it important that the Stage 1 RSA be undertaken before permission is granted and that the scope of the RSA should encompass the items set out above and not just the proposed site access and spine road design.

Consultee Comments for Planning Application 1856/17

Application Summary

Application Number: 1856/17

Address: Land North West Of Church Lane Barham Suffolk

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Case Officer: Jo Hobbs

Consultee Details

Name: Mrs Joanne Culley

Address: 23 Old Rectory Close, Barham, Ipswich, Suffolk IP6 0PY

Email: barhampc@outlook.com

On Behalf Of: Barham Parish Clerk

Comments

Barham Parish Council objects to both the Ely Road (DC/18/00861) and Church Lane (1856/17) developments.

The recent Barham and Claydon Highways Package Technical Note which has been commissioned by the developers does nothing to allay the concerns of the Parish Council and Barham residents.

The Section 4 Conclusions part of the document confirms the Parish Council's suspicions that these developments are a collaborative approach between SCC, MSDC, Pigeon, MSP and their respective transport consultants TPA and CCE has resulted in proposals for the delivery of a package of measures to notably benefit the local communities of Barham and Claydon with little regard to the wishes of local residents or the views of their local representatives.

Although a number of meetings have taken place between the developers, MSDC and SCC and the Parish Council we feel our views have always been side-lined in favour of the requirements of the developers. Indeed paragraph 4.6 only exists because the developers would not accept alternative suggestions made by the parish council. The Parish Council has significant concerns with SCC having control of the funds as to date they have not taken onboard the views/concerns of the Parish Council.

The Parish Council believes that the mitigations proposed in section 3 are a minimalist approach with no guarantees that any of the strategies will be delivered.

Section 3 states The development proposals include a number of site specific and off-site works and contributions that promote travel by bus, cycle and walking. How can this report claim to promote travel by bus when Suffolk County Council has cut subsidies to bus services in the area which has reduced the number of buses serving Barham? Also, one of the earlier proposals to promote cycling included turning the footpath that runs beside Claydon Primary School into a cycle way. We are appalled at that suggestion as it would result in cyclists riding down this gradient (alongside the high hedge) coming into immediate conflict with parents and children as they enter and exit the school gate by Lancaster Way.

Designing such a dangerous scenario into the travel plan suggests this is a desk-top exercise rather than the result of on-site fieldwork.

As a Parish Council we are unable to identify any positive benefits for local residents from the highway improvements proposed in the appendices.

**OBJECTION TO THE DEVELOPMENT, THE FOLLOWING COMMENTS
TAKEN FROM THE TPA HIGHWAYS TECHNICAL NOTE**

Lost Forever



Having read the recent report from TPA, the company representing Pigeon Investments Ltd, they seem to have made a very convincing argument to the council mainly based on financial contributions that are deemed to be a benefit to the village.

So, as the villagers we must all stand up to this and not allow this to be bulldozed through on technical jargon, or through financial benefits. (Community Infrastructure Levy)

The below extracts from TPA document are in Black and my responses in Red or importance in yellow or red highlighted.

I am amazed the council are so ready to buy into this scheme when it goes against everything in their documentation, regulation and guidelines, as unsustainable.

Is this really all it takes to destroy our heritage and historic buildings, farming and the sustainability and peace of our village.

The size of these projects are way too big and with all the other developments in the area this will be more than the number of required houses.

I cannot believe that the introduction of 260 barham, 70 ely road, 190 Whitton, 50+ from infill projects totalling 570, minimum, houses is not going to have an impact on our roads, which are already under strain.

Below extracts from the TPA report.

1.1 The purpose of this technical note is to set out the collaborative approach between Suffolk County Council (SCC), Mid Suffolk District Council (MSDC), Pigeon Investment Management Ltd (Pigeon) and M Scott Properties Ltd (MSP) **(NOT THE VILLAGE)** to assess the impacts of development proposals in Barham and Claydon and the delivery of a package of measures through financial contributions for the benefit of the local community.

ANS. Was there no representation from the villagers or the parish council or anyone with an objective opinion? Their solution to the problem is financial measures and contributions to the Suffolk County Council.

1.2 Transport Planning Associates (TPA) are instructed by Pigeon to provide transport planning and highway infrastructure design consultancy services in respect of their development of Land off Norwich Road, Barham and Claydon, Suffolk.

ANS. Instructed by the land promotor so they are NOT going to say that the development is unsustainable, are they? Their speciality, as a company, is getting permissions granted when there is objection from the community or technicalities they need to traverse, so how can they offer an opinion to the council.

What has happened to the THaT consultant's report, to which we have seen no response from the Council?

Pigeons previous consultants carried out their last traffic report in school holidays, we need a new independent report to be carried out on all surrounding developments and roads by an independent consultant to arrive at a fair conclusion.

1.4 The scheme proposals have been considered by SCC, in their role as the Local Highway Authority, and the scheme proposed has been supported and recommended for approval subject to a number of planning conditions and obligations.

ANS. Since SCC has taken the role of Local Highway Authority please can we see the evidence and reports to support this critical decision. This applies to both developments, Barham and Ely road.

1.7 Following MSDC Planning Committee meetings both the Norwich Road and Ely Road sites were deferred to the Council's Referrals Committee with a request that SCC should consider the cumulative highway impact of four proposed residential sites which total approximately 600 residential dwellings. In summary the four sites are as follows:

- Land off Norwich Road, Barham (Pigeon development site);
- Land east of Ely Road, Claydon (Scott Properties development site);
- Land to the east of The Street, Bramford (Planning reference 18/00233); and
- Land east side of Bramford Road, Sproughton (Planning reference 18/02010)

ANS. Why have they used Bramford and Sproughton as sites that will affect Barham-Claydon and not the 3500 houses at Westerfield and Henley Road and Westerfield is having another 100 houses being built now. Also, the new Whittan development 190 houses, the extra houses from Persimmon and Hopkins homes in GT Blakenham and Needham Market 300 and the other 200 houses from small infill sites!!!!!! WHAT IMPACT DO THESE HAVE??????

This point was raised at the last meeting by Mrs Guthrie, that consideration needs to be taken to account for **ALL the developments** and their impact consecutively and not each development individually. (I wonder if she would approve of this report and its non-inclusion of the majority of the surrounding developments that will have a severe impact on the roads)

I think we should know why the Councils Referral Committee chose these specific developments, and not other ones that will have more of an impact? How do they choose the developments so specifically?

1.9 At the initial meeting SCC were actioned to consider the impacts of the developments at each of the junctions where it was concluded that there was a limited impact from the Claydon sites on the junctions within Bramford and Sproughton and a limited impact from the Bramford and Sproughton sites on the junctions within Claydon. As a result, SCC refined the need for cumulative assessments of the original four junctions to that of the two within Barham and Claydon.

ANS. Of course, there is limited impact on each other because these are not the developments that are going to affect these roads and junctions, as your report has proved, conveniently.

Try taking the developments I have mentioned above into consideration.

1.10 Following the meeting TPA and CCE reviewed the impacts resulting from the Ely Road and Norwich Road schemes on the two junctions and concluded that there was not a severe cumulative impact.

ANS. TPA and Cannon Consulting Engineers provide planning and design focused consultancy advice to the development industry so they can get planning. Again, why would they say it is unsustainable.

I think it is amazing that the council MSDC and SCC are taking advice from the Land promotion companies consultants.

Both these companies support developments where they have considerable financial gain, where is the impartial consultation that a neutral council should be providing?

1.13 TPA and CCE agree with the conclusions of SCC that there is not a severe impact resulting from the proposed schemes in isolation or cumulatively.

ANS. Again, it does not matter how many times you say "it will not be severe", you have taken into consideration the wrong developments very conveniently.

Please can you also take into consideration the traffic from the new school that has land allocated for it, when making your calculations.

2.11 The proposed financial contribution for infrastructure improvement works could be used to deliver the following benefits:

- To encourage walking and cycling;
- To provide safer routes to schools; and
- To improve safety for pedestrians and cyclists.

2.12 The cost of these works has been estimated by SCC as £14,000

ANS. How are you going to encourage people to walk and cycle, how are you going to tell people which routes to take and say they are safer. Is this for every road in the village as new traffic will be coming in on every road. This will be difficult to implement whilst you are reducing the bus routes constantly.

4.1 A collaborative approach between **SCC, MSDC, Pigeon, MSP and their respective transport consultants TPA and CCE** has resulted in proposals for the delivery of a package of measures to notably benefit the local communities of Barham and Claydon.

ANS. I am glad to see that all the people who benefit financially from the development were present!!! When deciding the benefit of the village should the villagers more importantly the parishioners be present or are they merely going to be instructed by SCC and developers what is best for them.!

Perhaps would it be more democratic if the members of the Claydon and Barham Community were asked their opinion by their council, if they are going to have an extra 2000+ car journeys through the village each day what benefit are they going to get.

Have they asked the Claydon and Barham community??? I think you'll find most of our comments are objecting, even with the financial benefits and promises.

4.2 SCC have considered the impacts of the schemes in isolation and cumulatively (**WHICH PROJECTS?**) and consider that there is no residual cumulative impact and therefore no highway improvement works are required. However, it is proposed by the developers that there would be wider benefits to Barham and Claydon if the proposed infrastructure improvement works at the Station Road and Claydon Church Lane junctions were delivered through proportionate contributions from the Norwich Road and Ely Road schemes.

ANS. I cannot believe that there is no residual impact after reports from LHA and THaT consultants that say quite the opposite.

We should be entitled to see the complete report and I have not seen this on the planning portal.

4.3 The proposed financial contribution for the package of infrastructure improvement works together with infrastructure improvement works being promoted as part of each of the schemes are considered to represent a significant betterment within Barham and Claydon.

ANS. Whose opinion is this, and how can anyone judge this situation without being a member of the community.

4.5 The collaborative approach proposed to SCC and MSDC by the developers has resulted in a proposed package of benefits which should significantly improve transport and access provision within Barham and Claydon to the notable benefit of the local community.

ANS. Really!! what is the impact on Bulls road and Coopers road. Have the locals been asked if they think this is a benefit or are we just being forced into this development.

There has to be a third-party consultation after this report with all parties and representative involved, council, village residents, parish councillors, consultants and developers.

Report Highways England

Following the previous response asking for the cumulative effect of developments on junctions in Claydon, Barham, Bramford and Sproughton, meetings have taken place including all the developers for these sites. **It has been concluded only this development has an impact on Station Road/Norwich Road and Church Road/Norwich Road junctions. The impact is during the peak hour in the growth year showing significant delays, these are not considered severe!!!!!!!** To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below.

ANS. How can the development of barham church lane be the only development to affect the Barham church lane????

The new NPPF sets out more clearly the requirement to consider road safety as per of the para. 109 'severe test'.

We understand that Suffolk County Council, as the local highway authority, shared the concerns we highlighted regarding cumulative traffic impact and subsequently invited both applicants to meet with the local planning authority and the local highway authority to discuss a cooperative approach to providing improvements to mitigate the highway impacts. 3.2 Barham Parish Council was not invited to take part in these discussions.

Has the Stage 1 RSA been undertaken and what are the results?

NPPF 109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Historic England Recommendation

Historic England welcome the revisions that have been made to reduce the impact of the development on the adjacent heritage assets. **However, we still retain concerns on heritage grounds because of the impact on the Church of St. Mary. This would result in some, modest, harm to its significance and this should be weighed against the public benefits the scheme would deliver in line with the Framework.**

Planning and Design Group report for Barham and Claydon Parish extracts

Principle of Development (Location and Scale) Notwithstanding the absence of five-year housing land supply at the time of submission, in May 2017, the proposed application site falls outside of Claydon's northern settlement boundary (as defined in Proposal 1 of the 'saved' Mid Suffolk Local Plan 1998) and therefore into a countryside location. The local planning policy framework seeks to restrict residential development in the countryside, specifically through policy H7 of the Local Plan

which states: 'In the interests of protecting the existing character and appearance of the countryside, outside settlement boundaries there will be strict control over proposals for new housing.'

The proposals fail to meet the principles of Core Strategy policy CS1 which, within the supporting text, states that 'care must be taken to ensure that development is directed to locations where it will have the greatest benefits for rural sustainability'. As such full market housing development is not considered suitable for either land allocation or speculative planning applications in Key Service Centres. Only infill housing development within settlement boundaries is considered appropriate for relevant settlements such as Claydon.

To the north of this application site is land identified for further development potential. In the most recent Land Availability Assessment ('LAA') both sites are referred to as SS0076 and SS0551 respectively. The Parish Council feel that if this application for some 270 homes is consented it will establish a very dangerous principle for further development. As such it would be reasonable to expect subsequent future planning applications proposing development of land to the north of this application site. If all land was developed this would amount to the disproportionate introduction of some 600 new homes (effectively doubling the size of Claydon) and completely remove the countryside break between Claydon and the built-up area around Sandy Lane. This does not reflect a sustainable or a sound planning approach. Therefore, 5 The Parish Council restate their objection and would like to reiterate the risks of consenting this application to MSDC.

Indeed, as of March 2018 MSDC officers were minded to refuse this application on technical grounds. This was particularly in relation to the quality of ecological, landscape, archaeological, heritage and highway evidence. Subsequently, the application was deferred and the scheme revised however, The Parish Council maintain that some matters have not and will unlikely be resolved adequately to justify a recommendation for approval.

In relation to highway and access matters, The Parish Council would like to draw attention again to the technical report prepared by THaT Consultancy in June 2018 entitled a 'Review of Transport Issues'. The technical matters of this report will not be duplicated however, the conclusions stated that the existing highway network was not considered adequate to accommodate the cumulative impact of this and wider committed / proposed development in the locality of Mid Suffolk. Therefore, presenting a very real risk that the highway impact of this and neighbouring schemes is 'severe' and as such, in excess of the NPPF tolerance threshold. Further capacity testing and a Road Safety Audit (during the application period) were also recommended by the THaT Consultancy report. These concerns were reiterated by Suffolk County Council ('SCC') in a letter dated the 18th July 2018. This letter listed a range of local, cumulative development proposals and raised the prospect of severe traffic impacts on local junction capacity, also stating: 'With the increase in congestion, the concern is traffic may divert onto other routes which are unsuitable for the increase in traffic. Also, pedestrian safety in these built up areas could be compromised where they are trying to cross roads between queuing cars so not visible to other drivers. The additional traffic generated by the cumulative effect from the developments at these junctions show an increase in queuing and delays for all users therefore, we consider a co-operative approach to give an opportunity to provide improvements to mitigate against the significant impacts. We would like to invite applicants to attend a meeting with the Local Planning Authority and ourselves to discuss further options.'

Summary

In summary, The Parish Council maintain their objection this outline application. The principle for development on this site is severely diminished by virtue of its location in the countryside, excessive

scale and weight of cumulative negative technical impacts. The Parish Council consider that there are significant planning policy grounds on which to refuse this application and trust that this letter, alongside all related prior communication from The Parish Council, is considered very seriously by MSDC.

THaT consultants extract

Since then the road report by ThaT consultants under instruction of the Barham Parish Council, which is more accurate as it was not carried out in the school holidays, shows the severe impact this will have on the roads, making them **completely unsustainable by 2020, even without any of the developments going ahead.**

In conclusion with all the other problems like the school not being built and that the development of the second Phase would pay for the new school to get the next round of planning So, there will eventually be 600 houses in total.

The encroachment on the church of the development is unacceptable damage to building of significance.

The extra traffic is putting the listed red brick wall at permanent risk.

The development does not keep inline with the village envelope by going to far past the nursing home on Barham church lane.

This will create more rat runs through the village putting lives at risk especially children going to and from school.

The loss of grade 2 farming land.

The councillors kindly agreed to visit site at the last meeting, what are their thoughts on the site, its historical and natural importance and its suitability and sustainability?

I am sure that the councillors reviewing this situation can see this will do nothing to benefit the village apart from line the pockets land promotors, land owners and developers, and once they have all filled their pockets we will be left dealing with traffic jams, **impossible deteriorating roads and single lanes, Claydon Church lane, Barham Church lane, Coopers Road, Mill Lane, Bulls road, Bells Cross Road, Clay Lane,** overcrowded schools, no new GP services, this will no longer be a happy, quite village.

We understand that the council has kindly agreed to review this evidence which has now come to light with the highways department. How can the councils view be that there is no impact??????

THIS IS NOT SUSTAINABLE!

Subject:FW: P/A 1856/17

----- Original message -----

From: Suzanne Eagle <claywhit@btinternet.com>

Date: 17/01/2018 10:53 (GMT+00:00)

To: Rebecca Biggs <Rebecca.Biggs@baberghmidsuffolk.gov.uk>

Subject: P/A 1856/17

Good morning Rebecca

Regarding the O/L Planning Application for Land off Norwich Road, Barham and Claydon, I can confirm that Claydon & Whitton Parish Council have no further comments to add to our original comments.

Regards

Suzanne Eagle

Clerk to Claydon & Whitton PC

Comments for Planning Application 1856/17

Application Summary

Application Number: 1856/17

Address: Land Off Norwich Road Barham And Claydon

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Case Officer: Elizabeth Flood

Customer Details

Name: Mrs Suzanne Eagle

Address: Valley View, Church Lane, Claydon Ipswich, Suffolk IP6 0EG

Comment Details

Commenter Type: Amenity Group

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Claydon & Whitton Parish Council objects to this application for the following reasons:-

1. A large proportion of the traffic from this development will come through Claydon and we will need some sort of traffic control measures put in place.
2. Parking is already a major problem in Claydon which we feel will only be worsened by residents from the new development using the local facilities.
3. A surgery, school and shops are of paramount importance.
4. Drainage is a huge concern.
5. Over development of the site for the natural growth of the village.
6. The eastern extremity of the site is above the existing planning line for all the other buildings fronting The Slade and would potentially create a precedent and yet further development in Claydon towards what is one of our few natural habitats left in the village.
7. The right of way at the junction of Thornhill Road will be from the new development and will need traffic calming measures.

Consultee Comments for Planning Application 1856/17

Application Summary

Application Number: 1856/17

Address: Land Off Norwich Road Barham And Claydon

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Case Officer: Jo Hobbs

Consultee Details

Name: Mrs Charmaine Greenan

Address: Valley View, Church Lane, Claydon Ipswich, Suffolk IP6 0EG

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

Claydon and Whitton Parish Council remain strongly opposed to this development for all of the reasons that have previously been submitted by the Parish Council. The revised plans do not change the views of the Parish Council that this development would severely impact on the traffic in Claydon, it would put pressure on local infrastructure and services that are at capacity and would destroy ecologically important green belt land.

Consultee Comments for Planning Application 1856/17

Application Summary

Application Number: 1856/17

Address: Land North West Of Church Lane Barham Suffolk

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Case Officer: Jo Hobbs

Consultee Details

Name: Mrs Charmaine Greenan

Address: Valley View, Church Lane, Claydon Ipswich, Suffolk IP6 0EG

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

Claydon and Whitton Parish Council remain opposed to this application for all the previous reasons stated.

The minor changes made to the application do not have an impact on the problems with excess traffic in the village.

The latest proposal shows no improvement to the problem of the roads.

Midlands and East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Tel: 0113 824 9111
Email: kerryharding@nhs.net

Our Ref: NHSE/MIDS/17/1856/KH

Your Ref: 1856/17

Planning Services
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market, IP6 8DL

26 June 2017

Dear Sir / Madam

Outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (with all matters reserved except for access and spine road).

Land Off Norwich Road, Barham And Claydon.

1.0 Introduction

- 1.1 Thank you for consulting NHS England on the above outline planning application.
- 1.2 I refer to the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHS England), incorporating Ipswich and East Suffolk Clinical Commissioning Group (CCG).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of 1 GP practice operating within the vicinity of the application site. The GP practice does not have capacity for the additional growth resulting from this development.
- 2.2 The proposed development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated.

3.0 Review of Planning Application

- 3.1 The planning application does not appear to include a Health Impact Assessment.
- 3.2 The planning application includes the provision of a new doctors surgery site, details quoted in the Planning Statement as follows:

'Part of the site will be provided as land for the relocation of an enhanced doctors surgery. This reflects a long-held ambition for a new facility for Barham and Claydon Surgery and will help to meet current demand and future demand, on a site that allows for expansion to meet this need. This will include space for car parking with vehicular access from Church Lane, with pedestrian and cycle links.'

Please be advised that any proposed primary healthcare project is subject to CCG and NHS England prioritisation and approval processes, as primary healthcare commissioners.

Details for a proposed new facility for Barham and Claydon Surgery and its location have not yet been discussed with the CCG and NHS England.

4.0 Assessment of Development Impact on Existing Healthcare Provision

4.1 The existing GP practice does not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 720 residents and subsequently increase demand upon existing constrained services.

4.2 The primary healthcare services within a 2km radius of the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary of position for primary healthcare services within a 2km radius (or closest to) the proposed development

Premises	Weighted List Size ¹	NIA (m²)²	Capacity³	Spare Capacity (NIA m²)⁴
Barham and Claydon Surgery	2,723	169.00	2,465	-17.72
Total	2,723	169.00	2,465	-17.72

Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice
3. Patient Capacity based on the Existing NIA of the Practice
4. Based on existing weighted list size

4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

5.1 The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

5.2 The development would give rise to a need for improvements to capacity, in line with CCG estates strategy for the benefit of the patients at Barham and Claydon Surgery. Mitigation will be required towards the cost of this by the developer. Appropriate mitigation will be subject to discussion between the CCG and developer.

6.0 Conclusions

- 6.1 In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- 6.2 Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 6.3 NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

Kerry Harding
Head of Estates



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: planning.apps@suffolk.nhs.uk
Telephone Number – 01473 770000

Your Ref: 1856/17

Our Ref: IESCCG/000119/BCL

Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk, IP1 2BX

16/01/2019

Dear Sirs,

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Location: Land Off Norwich Road, Barham And Claydon, ,

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating Ipswich & East Suffolk Clinical Commissioning Group (CCG).

Background

2. The proposal comprises a development of up to 270 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is 1 GP practice within a 2km radius of the proposed development, this practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Barham and Claydon Surgery	2,922	169.00	2,465	-31
Total	2,922	169.00	2,465	-31

Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice.
3. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Barham and Claydon Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

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

Yours faithfully

Chris Crisell

Estates Planning Support Officer

Ipswich and East Suffolk Clinical Commissioning Group



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00023063
Local Planning Authority:	Mid Suffolk District
Site:	Land Off Norwich Road Barham And Claydon
Proposal:	Outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (with all matters reserved except for access and spine road).
Planning Application:	1856/17

Prepared by: Pre-Development Team

Date: 24 August 2017

If you would like to discuss any of the points in this document please contact me on 0345 0265 458 or email planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 2.1 The foul drainage from this development is in the catchment of Ipswich Cliff Quay Raeburn St Water Recycling Centre that will have available capacity for these flows.

Section 3 – Foul Sewerage Network

- 3.1 Development will lead to an unacceptable risk of flooding downstream. However a drainage strategy has been prepared in consultation with Anglian Water to determine mitigation measures.

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

Section 4 – Surface Water Disposal

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is acceptable.

We request that the agreed strategy is reflected in the planning approval

Section 5 – Trade Effluent

- 5.1 Not applicable

Section 6 – Suggested Planning Conditions

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

Foul Sewerage Network (Section 3)

CONDITION

No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

Surface Water Disposal (Section 4)

CONDITION

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

REASON

To prevent environmental and amenity problems arising from flooding.



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 Reference: 142118/1/0037677

Local Planning Authority: Mid Suffolk District

Site: Land Off Norwich Road Barham And Claydon, Barham

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church

Planning application: 1856/17

Prepared by: Pre-Development Team

Date: 24 January 2019

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 Ipswich-Cliff Quay Raeburn 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. However, we note that the developer has been in consultation with Anglian Water to define a feasible drainage strategy in reference to pre-planning 16757 and the developer has confirmed a connection to manhole 9300 via a pumped regime at 5.0l/s. 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.

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.

The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is acceptable based on a maximum discharge rate of 34.7l/s to manhole 0521, in reference to the FRA 6.0 and previous correspondence. We request that the agreed strategy is reflected in the planning approval.

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.

Surface Water Disposal (Section 4)

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

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)



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: growthandplanning@highwaysengland.co.uk

Council's Reference: 1856/17

Referring to the planning application referenced above, dated 15 January 2019, application for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure, land off Norwich Road, Barham and Claydon, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Signature:	Date: 23 January 2019
Name: Mark Norman	Position: Spatial Planning Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
mark.norman@highwaysengland.co.uk	

Annex A

This proposal is unlikely to have a severe affect upon the strategic road network



Historic England

EAST OF ENGLAND OFFICE

Ms Gemma Walker
Mid Suffolk District Council
Council Offices
High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582738

Our ref: P00594870

11 July 2017

Dear Ms Walker

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

**LAND OFF NORWICH ROAD, BARHAM AND CLAYDON, SUFFOLK
Application No. 1856/17**

Thank you for your letter of 6 June 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The application seeks outline planning permission for a phased development of up to 300 houses on land off Norwich Road. The site lies adjacent to the Church of St. Peter and St. Mary the grade I medieval parish church. It also lies to the south of Shrubland Hall, a historic country estate comprising a grade II* country house within a grade I registered landscape. We have concerns about the erosion of the rural setting of the church and consider this would cause harm to the significance of the church and a modest level of harm to the significance of Shrubland Hall. In line with the National Planning Policy Framework (NPPF) efforts should be made to minimise the harm and any harm that cannot be avoided should be weighed against the public benefits of the proposal.

We were asked by the applicant to provide pre application advice on the proposals and visited the site last year. We gave initial advice on the scheme and advice on the proposed viewpoints in emails dated 20 December 2016 and 6 January 2017.

Historic England Advice

Significance of the historic environment

The Church of St. Peter and St. Mary lies directly to the east of the application site on the opposite side of the bridleway track. The church dates from the early fourteenth century with later Perpendicular work and was then restored in the nineteenth century



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





EAST OF ENGLAND OFFICE

by the Victorians. It illustrates the ecclesiastical architectural styles of these periods. The south tower acts as a landmark. The church lies on high ground overlooking the Gipping Valley. It is set apart from the village to the north east where it forms a group with Barham Hall. There is an open agricultural landscape to the north, west and east of the church which includes the application site. The main approach is along Church Lane.

The open landscape setting of the church referred to above contributes to the significance of the church. Historic churches are often well sited, reflecting the importance of these buildings to the community. The elevated position of the church and the open landscape enhances the prominence of the church and its role as a landmark. There are long views towards the building from the land to the north and from the west along Norwich Road. The rural setting also provides a pleasing and quiet character that contributes to the significance of the church and might be said to complement its spiritual values.

Shrubland Hall is an eighteenth century classical country house by the architect James Paine that was subsequently remodelled twice in the mid nineteenth century. The last phase of work was carried out by Sir Charles Barry in the Italianate style and includes a tall viewing tower. The registered landscape includes a seventeenth century park extended in the eighteenth and nineteenth centuries but is particularly distinguished by the mid nineteenth century Italianate garden by Barry. The Hall is dramatically positioned at the top of an escarpment overlooking the Gipping Valley. This allows it to command a wide view over the countryside, particularly from the elevated position at the top of the tower. The register entry for the landscape refers to the views to the south and west of an agricultural landscape. There has been considerable development along the Gipping Valley in the twentieth and twenty-first centuries, some of which intrudes into these views. However, where the rural landscape survives it contributes to the significance of the site by illustrating its role as a country estate and has an aesthetic value.

The proposal

The application proposes the construction of up to 300 houses, associated access arrangements and reserved land for schools. The site lies between Church Lane and Norwich Road and to the west of the Church of St. Peter and St. Mary. An area of parkland is proposed at the eastern end of the site as a buffer between the church and the new development. This incorporates a car park to serve the parkland and the church. Planting is proposed along the north and east boundaries of the site. The Heritage Statement notes that the extent of the green buffer, the built form of the eastern edge of the site and proposed landscaping would be subject to detailed design.

The impact of the proposal on the significance of the historic environment



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The Church of St. Peter and St. Mary

The change in the character of the land from agricultural land to a residential development would have an impact on the significance of the church. This was considered at the pre application stage. As a result of these the green buffer has been extended across the full width of the eastern end of the site. We welcome this retention of a larger area of open space directly adjacent to the church. This maintains the separation of the church from the village.

The position of the eastern line of development was also discussed. The site slopes down towards the Norwich Road and there is a change in the topography of the site with the eastern end being a flatter area which then drops more steeply to the west. We recommended utilising the topography to help to reduce the impact of the development on the church. The green buffer would also help to moderate the impact of the development on the church in views from the churchyard and immediate vicinity of this. However, it is difficult to be clear about how successfully the topography has been used and how effective the planted boundary to the housing would be in reducing the impact of the development. Viewpoint 10 from the churchyard shows the rooflines would be visible from the area near the church itself but the buildings would presumably be more visible moving west. Viewpoint 12 is a view towards the church from the north showing the church in the context of the rural landscape of the application site to the west. However, it only shows the extent of the site and does not offer a wireline or photomontage of the development.

The development would have a greater impact in longer views to the church. The loss of the open landscape in these views would erode the historic and aesthetic appreciation of the church. As a large development it would obscure views towards the church from Norwich Road. This is shown in viewpoint 5 from the Norwich Road where the open landscape currently allows views up to the church. The development would be seen in conjunction with the church on the approach to the church from the west along Church Road. Viewpoint 7 on Barham Church Lane shows the scale of the development here and indicates the change to the nature of the views of the church from the west. From Viewpoint 9 on the bridleway at the junction with Church Lane it seems likely from this area the development would be seen to the west in conjunction with views of the church. The development would also be visible in the views of the church from further to the north between the application site and Shrubland estate as is shown in viewpoint 13. To some extent the impact from the north might be mitigated with a strong planting boundary but again at this stage it is hard to be clear how well this could be achieved.

Shrubland Hall

The application includes a number of views from Shrubland Hall in line with our pre application advice and these are helpful in considering the impacts on the designated heritage assets. Viewpoint 1 is taken from the tower at Shrubland Hall. The wireline indicates that the development would be visible across a considerable section of the





landscape but it is difficult to tell from the wireline how significant this erosion of the wider rural setting would be. However, given it would affect the longer views and would be seen in the context of other development in the area, we consider this would result in a modest degree of harm to the significance of the Hall. Viewpoint 2 shows that from the high ground within the registered landscape, the development would be largely screened behind the existing tree belt around the park perimeter with only the eastern end being visible. Again we consider this to be lower impact but some revision of the design may enable the impact to be removed and this should be considered.

The scheme includes a new car park in the parkland buffer next to the church to serve both the public space and the church. While we accept the desirability of some parking here, we suggest care is taken to ensure it does not undermine the landscape character of this area. This would suggest further consideration of the size and treatment of the car park at a detailed design stage.

Legislation and policy context

As the application affects a listed building, the statutory requirement to have special regard to the desirability of preserving the building, its setting and any features of special interest (ss.16, 62, 1990 Act) must be taken into account by the local planning authority when making its decision.

At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development. The Framework describes how economic, social and environmental gains should be sought jointly and simultaneously through the planning system (paragraph 8 and 14). It is a core planning principle to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (paragraph 17).

This is developed in the section on the Conserving and Enhancing the Historic Environment. This asks local planning authorities to take account of the desirability of sustaining and enhancing the significance of heritage assets (paragraph 131). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (paragraph 132). Planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (paragraph 137).

An assessment of significance should be used to consider the impact of a proposal to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 129). If a proposal cannot be amended to avoid all harm,





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then if the proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (paragraph 134).

Historic England's position

We welcome the revisions that have been made as a result of the pre application discussion to create a green buffer across the width of the eastern end of the site. This would maintain the separation of the church from the village which is desirable. The buffer would also help to reduce the impact of the development on views from the church and immediate vicinity. However, it is difficult to assess how successfully the topography has been used to mitigate the impact of the development further and the role the landscaping would play in achieving this in these views. Your authority may want to explore this further with the applicant to see if there is scope to further reduce the impact. The development would have a greater impact on longer views of the church, obscuring those from Norwich Road and impacting on those from Barham Church Lane and the north as shown in viewpoints 5, 7 and 13. We consider this would result in a considerable level of harm to the significance of the church. With regard to Shrubland Hall, we consider there would be a modest level of harm caused by the development.

In line with the Framework, we recommend that efforts are made to reduce the level of harm. We suggest further consideration is given to exploring whether the eastern boundary of the housing takes full advantage of the topography to reduce the harm. This might require further information, perhaps in the form of a wireline from viewpoint 12. It should also explore the potential to screen the development from the churchyard in the area shown in viewpoint 10. Consideration should also be given to whether the development could be screened in views from the park at Shrubland by revising the siting of the eastern houses. Once your authority is satisfied that the impact of the development has been minimised, any remaining harm should be weighed against the public benefits of the scheme.

Recommendation

Historic England objects to the application on heritage grounds in light of the harm caused to the significance of the Church of St. Peter and St. Mary and to Shrubland Hall and on the basis it is not clear that efforts have been made to reduce this harm. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 18, 14, 129, 132 and 137.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





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Please contact me if we can be of further assistance.

Yours sincerely

Clare Campbell

Principal Inspector of Historic Buildings and Areas

E-mail: clare.campbell@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

Ms Gemma Walker
Mid Suffolk District Council
Council Offices
High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582738

Our ref: P00594870

19 February 2018

Dear Ms Walker

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

**LAND OFF NORWICH ROAD, BARHAM AND CLAYDON, SUFFOLK
Application No. 1856/17**

Thank you for your letter regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

Historic England provided advice on the initial application in a letter dated 11 July 2017. In response to our letter the applicants' agent met with us in the autumn of last year to discuss amendments and additional supporting information. In light of this we have updated our advice, however this letter should be read in conjunction with our earlier letter.

Historic England Advice

Historic England's principal concern related to the impact of the proposed housing development on the setting of the Church of St. Mary. In line with the National Planning Policy Framework, we recommend that efforts were made to reduce the level of harm. We suggested further consideration was given to exploring whether the eastern boundary of the housing took full advantage of the topography to reduce the harm and to the potential to screen the development from the churchyard in the area shown in viewpoint 10. We also advised that consideration should be given to whether the development could be screened in views from the park at Shrubland by revising the siting of the eastern houses.

In response to our advice, the number of plots at the east end of the development has been reduced to seven. These are also proposed as single storey houses, as are a



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





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number of the houses directly west of these plots. The reduction of the plots to 7 provides an area of open space adjacent to Church Road where planting is proposed. A thicker line of planting is also proposed at the northern end of the planting buffer. In addition, other trees are also shown in the gardens of these houses.

The updated wireline from viewpoint 10 within the churchyard shows how locating single storey properties here has reduced the visibility of the development from this location. With the exception of the gap at the field gate, generally only the upper parts of the roofs would be visible. Viewpoint 13 shows the church and the development site from the north. The wireline demonstrates how lowering the height of the houses and the omitting the plot at the south east corner has reduced the impact of the development. It is now set further away from the church in these views and the ridge lines sit below the horizon.

The effect of the revisions on the setting of Shrubland Hall is shown in viewpoints 1 and 2. These show a reduction in the mass of the development at the eastern end. In views from the ground, viewpoint 2, this brings the height of the development down to approximately the height of the treeline. This would help to reduce the impact of the development in views from Shrubland.

We welcome the amendments to the proposals which show that efforts have been made to reduce the harm to the heritage assets. These have helped to reduce the impact of the development on views from the churchyard and views of the church from the north. They have also reduced the impact on Shrubland Hall to a very modest level of harm. The proposal does however remain for a large development which would have an impact on the setting and significance of the Church of St. Mary. It would obscure views of the church from the Norwich Road, viewpoint 5. It would also affect the approach to the church from the west along Church Road, viewpoints 7 and 9. This would result in harm to the significance of the church. The harm to the historic environment should therefore be weighed against the public benefit the development would deliver in line with the National Planning Policy Framework. If your authority is minded to grant consent, this should be conditional upon your approval of details including materials and the implementation and maintenance of the landscaping proposals.

Recommendation

Historic England has concerns regarding the application on heritage grounds because of the impact on the setting of the Church of St. Mary. 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 131 and 132 of the NPPF.

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Clare Campbell

Principal Inspector of Historic Buildings and Areas

E-mail: clare.campbell@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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Historic England

EAST OF ENGLAND OFFICE

Ms Gemma Walker
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582738

Our ref: P00594870

1 June 2018

Dear Ms Walker

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

**LAND OFF NORWICH ROAD, BARHAM AND CLAYDON, SUFFOLK
Application No. 1856/17**

Thank you for your letter of 4 May 2018 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

Historic England provided advice on the initial application in a letter of 11 July 2017 and advised on the subsequent amendments in a further letter of 19 February 2018. The applicants' agent met with us on 25 April to discuss the current revisions to the scheme. In light of these we have updated our advice. This letter should be read in conjunction with our earlier letters.

Historic England Advice

The scheme has been revised and the number of housing units reduced to 269. The north eastern part of the site is now to be retained as agricultural land. The self build units at the eastern end of the site have been removed. This allows for a wedge of new parkland connecting the open space of the agricultural land and rough grassland for the church at the eastern end of the site to the parkland to the east of the proposed school site.

The removal of the self build houses at the eastern end of the development sets the line of housing further back from the Church of St. Mary. The height of the buildings at the eastern end does not appear to be shown on the annotated master plan. Our understanding is that these would be single storey buildings but your authority may wish to clarify this. However, the positioning of the built development further from the church is to be welcomed. Although the wireline drawings have not been updated to reflect the latest revision (and we do not consider this necessary from our point of



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





view), the greater distance would reduce the visibility of the development from within the churchyard, taking more of it below the line of the hedgerow boundary to the church, see viewpoint 10. In addition, it should help to lessen the impact in views from the north seen in viewpoint 13. The retention of the north eastern area as an agricultural field would also retain more of the existing rural landscape character, helping to retain more of the rural setting of the church. The revisions would therefore reduce the impact of the proposed development upon the significance of the church.

In relation to Shrubland Hall, the removal of the houses at the eastern end and the area of new parkland numbered 5 would help to reduce the impact of the development on the significance of the Hall. This is illustrated in viewpoint 2, where the greatest potential for visibility of the development around the level of the tree line was at the eastern end. The revisions should reduce this.

Historic England therefore welcomes the revisions to the proposals which further reduce the harmful impact of the development to both the Church of St. Mary and Shrubland Hall. These go further in terms of reducing the impact on the views from the churchyard and the views of the church from the north. They also further reduce the impact on Shrubland Hall as is described above. While the amendments are positive and demonstrate the applicants efforts to minimise the harm to the historic environment, the proposal would however still result in some harm to the setting of the church through the loss of views from the Norwich Road and the erosion of the rural setting of the church which would be particularly felt on the approach to the church from the west along Church Road. This harm should be weighed against the public benefits the proposal would deliver in line with the National Planning Policy Framework. If your authority is minded to grant consent, this should be conditional upon your approval of details including materials and the implementation and maintenance of a landscaping scheme.

Recommendation

Historic England welcome the revisions to reduce the impact of the development on the adjacent heritage assets. However, we still retain concerns on heritage grounds because of the impact on the Church of St. Mary. This would result in some harm to its significance and this should be weighed against the public benefits the scheme would deliver in line with the Framework. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Clare Campbell

Principal Inspector of Historic Buildings and Areas
E-mail: clare.campbell@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

Ms Gemma Walker
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582738

Our ref: P00594870

15 August 2018

Dear Ms Walker

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

**LAND OFF NORWICH ROAD, BARHAM AND CLAYDON, SUFFOLK
Application No. 1856/17**

Summary

Historic England provided advice on the initial application in a letter of 11 July 2017 and advised on the subsequent amendments in letters of 19 February and 1 June 2018. We have recently received further amendments in an email dated 16 July. In light of these we have updated our advice. This letter should be read in conjunction with our earlier letters.

Historic England Advice

The number of proposed homes is retained as up to 269 in the same form described as being in the same form as the previous layout with amendments to the open space, retained agricultural land and extended church grounds at the eastern end of the site.

The change of land use at the eastern end provides extended grounds for the church. If this helps to facilitate the use of the church, it would potentially help support the ongoing use of the building which could be seen as a public benefit. The extension of the church ground has resulted in a reduction of the agricultural land, however as it remains as open green space this would still provide a buffer between the church and development and retain something of the immediate rural setting of the church. The use of single storey buildings at the eastern end of the development would also help to reduce the impact of the built form here.

Historic England therefore maintain the position set out in our last letter of advice dated 1 June 2018. We welcome the earlier revisions to the proposals which further reduced the harmful impact of the development to both the Church of St. Mary and Shrubland Hall. These reduced the impact on the views from the churchyard and the views of the church from the north. They also further reduced the impact on



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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Shrubland Hall as is described above. While the amendments are positive and demonstrate the applicants efforts to minimise the harm to the historic environment, the proposal would however still result in some, modest, harm to the setting of the church through the loss of views from the Norwich Road and the erosion of the rural setting of the church which would be particularly felt on the approach to the church from the west along Church Road. This harm should be weighed against the public benefits the proposal would deliver in line with the National Planning Policy Framework. If your authority is minded to grant consent, this should be conditional upon your approval of details including materials and the implementation and maintenance of a landscaping scheme.

Recommendation

Historic England welcome the revisions that have been made to reduce the impact of the development on the adjacent heritage assets. However, we still retain concerns on heritage grounds because of the impact on the Church of St. Mary. This would result in some, modest, harm to its significance and this should be weighed against the public benefits the scheme would deliver in line with the Framework. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Clare Campbell

Principal Inspector of Historic Buildings and Areas
E-mail: clare.campbell@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Date: 26 July 2017
Our ref: 217628
Your ref: 1856/17



Dylan Jones
Babergh & Mid Suffolk District Councils

planninggreen@baberghmidsuffolk.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Jones,

Planning consultation: Outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (with all matters reserved except for access and spine road) – **REVISED RESPONSE**

Location: Land Off Norwich Road, Barham And Claydon

Thank you for your consultation on the above dated 6th June 2017 which was received by Natural England the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF ADVICE

Based on the information provided in support of the application, Natural England's view is that there is currently insufficient information to allow likely significant effects to the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site¹ to be ruled out. We also consider that there is insufficient information to rule out adverse effects the Stour Estuary Site of Special Scientific Interest (SSSI).

There is also currently insufficient information on soils and land quality to enable Natural England to provide a substantive response to this consultation as required under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Please provide the information listed below and re-consult Natural England. Please note that you are required to provide a further 21 day period for us to respond from receipt of this information.

¹ Listed or proposed Wetlands of International Importance under the Ramsar Convention (Ramsar) sites are protected as a matter of Government policy. Paragraph 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.

DETAILED ADVICE

1) Advice on designated sites under the Conservation of Habitats & Species Regulations 2010 (as amended) and the Wildlife and Countryside Act 1981 (as amended)

Internationally and nationally designated sites – FURTHER INFORMATION REQUIRED

This development proposal has the potential to affect the Stour and Orwell Estuaries SPA and Ramsar site which are European sites (also commonly referred to as Natura 2000 or N2K sites) afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations') and the Stour Estuary SSSI which is notified at a national level.

There are currently concerns for the impacts of recreational pressure on the Stour and Orwell Estuaries, in particular the disturbance of birds for which the sites are in part notified. Natural England considers that housing development (or 'projects' in Habitats Regulations Assessment (HRA) terms) such as this has the potential to increase levels of recreational disturbance to the estuary once the dwellings are occupied by new residents. The birds associated with the estuary are sensitive to disturbance from recreation, in particular off-lead dog walking, and the unique attraction of the estuary presents a strong draw for undertaking such activities.

We therefore advise that a HRA should be undertaken for this development proposal to assess this potential impact and formulate any necessary mitigation measures. We consider that mitigation of such impacts usually requires more than one type of approach; this is typically a combination of 'on-site' informal open space provision and promotion (i.e. in and around the development site) and 'off-site' visitor access management measures (i.e. at the N2K site).

With regards the 'off-site' measures, you may be aware that Babergh District Council, Suffolk Coastal District and Ipswich Borough Councils, have commissioned Footprint Ecology to produce a joint Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategic solution aims to reduce recreational pressures arising from new housing to the designated sites in and around these authorities. Once approved, the RAMS will specify requirements for developer contributions to an agreed and costed scheme of measures to help avoid and mitigate such impacts to those designated sites scoped in to the RAMS (which includes the Stour and Orwell Estuaries) over the respective local plan periods. Although this proposed development is in Mid Suffolk and so outside the above local authority boundaries, it is within the 13 km zone of influence for recreational impacts, as identified through the recent RAMS work. Therefore, in line with our recent interim advice letter to the above authorities (our ref: 218775, dated 22nd June 2017), we advise that it would be appropriate for a suitable financial contribution to be secured for this application as part of the HRA mitigation package.

2) Advice on Soils and Land Quality

Having considered the proposals as a consultation under the Development Management Procedure Order (as amended), and in the context of Government's policy for the protection of the 'best and most versatile' (BMV) agricultural land as set out in paragraph 112 of the National Planning Policy Framework (NPPF), Natural England draws your Authority's attention to the following land quality and soil considerations:

1. Based on the information provided with the planning application, it appears that the proposed development comprises approximately 24 ha of agricultural land, some or all of which may be classified as BMV land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).
2. No assessment appears to have been made on the potential for impacts on BMV agricultural land. In order to assess such impacts, we advise that you to obtain from the applicant a detailed ALC survey in accordance with ['Agricultural Land Classification of England and Wales' \(MAFF, 1988\)](#). Further information is also contained in [Natural England Technical Information Note 049](#).

The ALC survey should include a map of the grades and numbered sampling locations, and a report of the findings, including a detailed description of auger borings and soil pits.

3. Government policy is set out in Paragraph 112 of the NPPF which states that:

'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

4. It is recognised that a proportion of the agricultural land affected by the development may remain undeveloped (e.g. public open space). In order to retain the long term potential of this land and to safeguard soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.
5. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site. Detailed guidance is available in Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#) (including accompanying [Toolbox Talks](#)) and we recommend that this is followed.

Please note that we are not seeking further information on other aspects of the natural environment, although we may make comments on other issues in our final response. On receipt of the information requested, we will aim to provide a full response within 21 days of receipt.

Should the developer wish to explore options for avoiding or mitigating effects on the natural environment with Natural England, we recommend that they use our [Discretionary Advice Service](#).

This concludes Natural England's advice at this stage which I hope you will find helpful.

For any queries relating to the specific advice in this letter only please contact Jack Haynes using the details given below. For any new consultations, or to provide further information on this consultation, please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Jack Haynes

Land Use Operations Norfolk & Suffolk Team

Email: jack.haynes@naturalengland.org.uk

Tel: 0208 02 64857

Date: 25 January 2018
Our ref: 235468
Your ref: **1856/17**



Rebecca Biggs
planninggreen@babberghmidsuffolk.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Rebecca

Planning consultation: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 300 homes, including 7 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Location: Land Off Norwich Road, Barham And Claydon

Reason(s) for re-consultation: Change of description from 8 to 7 self-build plots and additional information dated 22/12/2017.

Thank you for your consultation on the above which was received by Natural England on 03 January 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

We have previously advised that a Habitats Regulations Assessment (HRA) should be undertaken for this development proposal to assess the potential impact of increased recreational disturbance on internationally designated sites within a radius of 13km. We note that discussions have taken place with the District Ecologist with regard to the potential impact of the development from recreational disturbance on the Stour & Orwell Estuaries Special Protection Area (SPA) and Ramsar site. We advise that an appropriate planning condition or obligation is attached to any planning permission to secure a financial contribution from the developer for a suite of 'off-site' visitor management measures designed to address the effects of increased recreational disturbance.

Natural England's advice on other natural environment issues is set out below.

Further advice on mitigation

In our previous response (date: 26 July 2017; our ref: 217628), we advised that further information was required, namely an HRA to assess the potential impact of the proposal and to formulate any

necessary mitigation measures. We note that discussions have taken place with the District Ecologist with regard to the potential impact of the development from recreational disturbance on the Stour & Orwell Estuaries SSSI, SPA and Ramsar site and that it can be demonstrated that the proposals are acceptable in terms of their potential impact upon the designated sites, including a proportionate financial contribution that would be secured by Section 106 Agreement (see amended letter from Pigeon dated 22 December 2017). However, we have not seen the HRA and would be happy to comment if required. We suggest that the financial contribution should be secured by planning condition or obligation.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Great crested newts

We note the email from baseecology to Pigeon (date: 4th December 2017; subject: Land off Norwich Road, Barham and Claydon, Suffolk) regarding great crested newt mitigation. Natural England has provided written advice to Pigeon with regard to great crested newts (GCN) under our Discretionary Advice Service.

In principle, we are satisfied by the survey and mitigation measures identified to address impacts on GCNs. However, please note that any compensatory habitat to be provided for GCN must be managed and maintained solely for GCN. It cannot, for example, be classified both as GCN compensatory habitat and public green space. This factor may need to be recognised in the HRA in calculations of on-site public open space.

The location, amount and type of compensation put forward will be safeguarded for GCN preferably by a Section 106 agreement which can be obtained at the planning stage, or sections 7 and 13 NERC Act agreement which will be between the developer and Natural England. If the legal agreement is to be a NERC Act agreement, this will need to be agreed before the licence is issued.

Best and Most Versatile Agricultural Land

From the documents accompanying the consultation we consider this application falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, as the proposed development would not appear to lead to the loss of over 20 ha 'best and most versatile' agricultural land (paragraph 112 of the National Planning Policy Framework).

For this reason we do not propose to make any detailed comments in relation to agricultural land quality and soils, although more general guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend that this is followed. If, however, you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

If you have any queries relating to the advice in this letter please contact me on 01284 735236.

Should the proposal change, please consult us again.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Alison Collins

Sustainable Development Lead Adviser

alison.collins@naturalengland.org.uk

Date: 28 November 2019
Our ref: 301224
Your ref: 1856/17



Mid Suffolk District Council
planninggreen@baberghmidsuffolk.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Jo Hobbs

Planning consultation: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Location: Land North West Of, Church Lane, Barham, Suffolk

Thank you for your consultation on the above dated 18 November 2019 which was received by Natural England on 18 November 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE – European designated sites¹

It has been identified that this development site falls within the 13 km 'Zone of Influence' (Zoi) of one or more of the European designated sites set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'). In the context of your duty as competent authority under the provisions of the Habitats Regulations², it is therefore anticipated that, without mitigation, new residential development in this location is 'likely to have a significant effect' on one or more European designated sites, through increased recreational pressure, either when considered 'alone' or 'in combination' with other plans and projects.

Natural England advises that further information is required to determine the recreational disturbance impacts of this development. Reference should be made to the Suffolk Recreational

¹ Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites; the latter are listed or proposed Wetlands of International Importance under the Ramsar Convention and are protected as a matter of Government policy. Paragraph 176 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.

² Conservation of Habitats and Species Regulations 2017, as amended (commonly known as the 'Habitats Regulations'). Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process. The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

Disturbance avoidance and mitigation strategy, and to Natural England's RAMS guidance to local authorities (please see attached). Having reviewed the planning documents for this application, it appears that you have not yet undertaken a HRA - Stage 2: Appropriate Assessment to consider this issue. We therefore advise that you do so now using our suggested template and that you should not grant permission until such time as the HRA Appropriate Assessment has been carried out and the conclusions confirmed in line with the our guidance. Please note that we will only provide further comment on your authority's HRA once completed and not a 'shadow' HRA provided by the applicant. Natural England can provide further advice through its Discretionary Advice Service <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

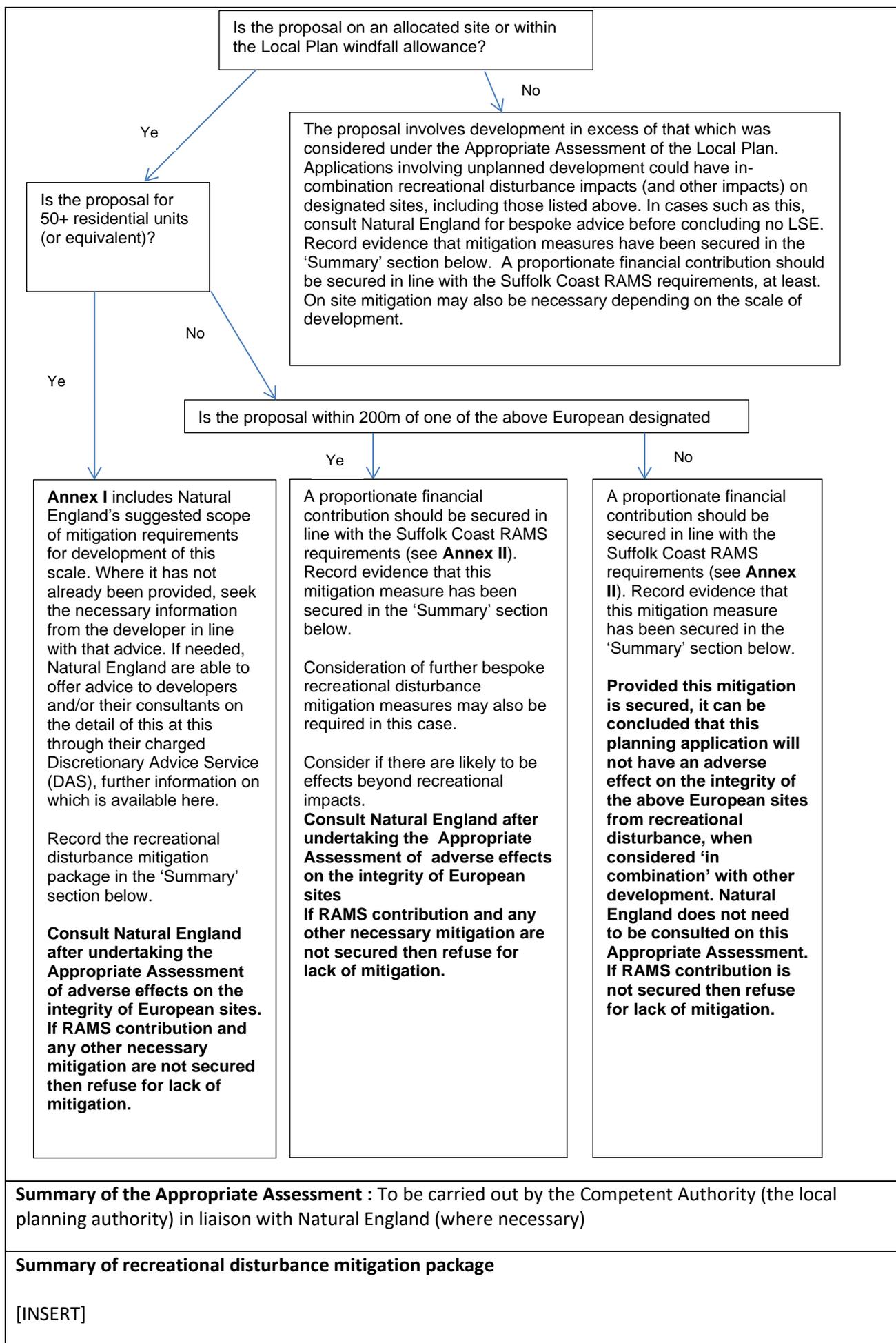
For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Matthew Dean
Consultations Team

Annex 1: Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Guidance and Habitat Regulation Assessment (HRA) Record

Application details	
Local Planning Authority:	
Case officer	
Application reference:	
Application description:	
Application address:	
Status of Application:	
Grid Ref:	
HRA Stage 1: screening assessment	
<p>Test 1 – the significance test: Based on the development type and proximity to European designated sites, a judgement should be made as to whether the development constitutes a ‘likely significant effect’ (LSE) to a European site in terms of increased recreational disturbance</p>	
<p>Is the development within 13 km of the below European sites (check NE IRZs)?</p> <ul style="list-style-type: none"> • Alde-Ore Estuary Special Protection Area (SPA) and Ramsar site • Benacre to Easton Bavents SPA • Deben Estuary SPA and Ramsar site • Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC) • Minsmere – Walberswick SPA • Orfordness-Shingle Street SAC • Sandlings SPA • Stour and Orwell Estuaries SPA and Ramsar site (Suffolk side only) 	
<p>Yes</p> <p>↓</p>	<p>No</p> <p>↓</p>
<p>Does the planning application constitute residential development?</p> <ul style="list-style-type: none"> • New dwellings of 1+ units included in current site allocations and windfall (excludes replacement dwellings and extensions) • Houses in Multiple Occupancy (HMOs) • Residential caravan sites (excludes holiday caravans and campsites) • Gypsies, travellers and travelling show people plots • Tourist accommodation 	<p>Conclude no LSE to the above designated sites in terms of recreational disturbance.</p> <p>An Appropriate Assessment (AA) is not required where recreational disturbance to these sites is the only issue or recreational disturbance to these sites can be scoped out of any HRA covering other issues.</p>
<p>Yes</p> <p>↓</p>	<p>No</p> <p>↓</p>
<p>Conclude LSE. This proposal is within scope of the Suffolk Coast RAMS as it falls within the 13 km ‘zone of influence’ for likely impacts and is a relevant residential development type as listed above. It is anticipated that such development in this area is ‘likely to have a significant effect’ upon the interest features of the aforementioned designated site(s) through increased recreational pressure, when considered either alone or in combination.</p> <p>Proceed to HRA Stage 2: Appropriate Assessment to assess recreational disturbance impacts on the above designated sites.</p>	<p>RAMS is not relevant, however other Habitats Regulations considerations should be taken into consideration for non residential developments and in some circumstances a bespoke AA may be required.</p>
HRA Stage 2: Appropriate Assessment	
<p>Test 2 – the integrity test: The applicant must provide sufficient evidence to allow the Appropriate Assessment to be made, which is the stage at which avoidance and/or mitigation measures can be considered</p>	



Conclusion

Having considered the proposed avoidance and mitigation measures above, [INSERT LPA] conclude that with mitigation the project will not have an Adverse Effect on the Integrity of the European sites included within the Suffolk Coast RAMS.

Having made this appropriate assessment of the implications of the plan or project for the site(s) in view of that (those) site(s)'s conservation objectives, and having consulted Natural England and fully considered any representation received (where necessary), the authority may now agree to the plan or project under regulation 63 of the Conservation of Habitats and Species Regulations 2017.

Local Planning Authority Case Officer comments, signed and dated:

Annex I – Natural England’s recommendations for larger scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km³ within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated ‘dogs-off-lead’ areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available here.

However, the unique draw of the above European sites means that, even when well-designed, ‘on-site’ provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together ‘in combination’. We therefore advise that consideration of ‘off-site’ measures (i.e. in and around the relevant European designated site(s)) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

³ Taken from *Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

Annex II – Natural England’s recommendations for smaller scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (0-49 units, or equivalent, as a guide) which are not within/directly adjacent to a European designated site

Whilst the provision of well-designed open space/green infrastructure on site or contributions towards strategic green infrastructure in your district is to be welcomed for developments of this scale, we advise that consideration of ‘off-site’ measures (i.e. in and around the relevant European designated site(s)) is required as mitigation for predicted recreational disturbance impacts in these cases as a minimum. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

Annex 2 – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#)

Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)⁴ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)⁵. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

⁴ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

⁵ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 91 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

Gemma Walker
Planning Department
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

23rd June 2017

Dear Gemma,

**RE: 1856/17 Outline planning application for phased development for the erection of up to 300 homes.
Land Off Norwich Road, Barham and Claydon**

Thank you for sending us details of this application. We have read the ecological survey reports (Preliminary Ecological Appraisal, Apr 2017 and Great Crested Newt Habitat Suitability Index Assessment, Apr 2017, both BasEcology) and we note the conclusions of the consultant. We have the following comments on this proposal:

Protected and/or UK Priority Species

Great Crested Newts

The Great Crested Newt Habitat Suitability Index Assessment concludes that the Natural England Discretionary Advice Service (DAS) should be used for further advice on the mitigation measures required as part of this development, as it was not possible to access all the identified ponds for survey. However, there is no evidence in the application documentation that such advice has been sought and no mitigation for any potential impacts on great crested newts is provided. We therefore consider that it is not possible for the local planning authority to determine that the proposed development will not result in an adverse impact on this species.

Great crested newts are fully protected under the Wildlife and Countryside Act (1981) (as amended) and The Conservation of Habitats and Species Regulations (2010) (as amended). It is illegal to kill, injure, capture or disturb them or to obstruct access to areas where they live and breed. The terrestrial habitat used by the newts may extend up to 500 metres from their breeding pond and both these habitats are also protected from damage and destruction.

Breeding Birds

The Preliminary Ecological Appraisal (PEA) identifies that the application site provides nesting potential for skylark (a UK Priority species). No surveys have been undertaken to determine the level of use of the site by skylark, however the PEA concludes that the loss of the site is unlikely to have a significant impact on this species due to the nesting opportunities available in the wider area. Whilst such opportunities are available, it has not been demonstrated that they are not already utilised by other pairs of skylark. Additionally, no compensation measures (such as the creation of skylark plots on neighbouring arable fields) appear to be proposed to address the loss of nesting resource which would result from the proposed development.

The site also offers nesting opportunities for other UK Priority bird species such as linnet and

yellowhammer. Nesting opportunities for such species are likely to be reduced through loss of some of the existing hedgerows and the change in land use neighbouring these hedgerows. Uncompensated, this will result in a reduction in the nesting resource available for these species in this area.

Brown Hare

As recognised in the PEA the site provides habitat for brown hare which would be lost as a result of the proposed development. Whilst mitigation in the form of buffer planting is proposed, nonetheless there would still be a reduction in the habitat available for this species in this area.

UK Priority Habitats

Hedgerows

The proposed development would result in the loss of at least seven sections of hedgerow to create vehicular access to the site. Hedgerows are a UK Priority habitat and uncompensated loss of such habitat is contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk DC Core Strategy policy CS5 and Local Plan policy CL8. From the plans provided it is unclear how such compensation would be provided, or whether additional hedgerow removal may be required in order for the proposed vehicle accesses to meet the required highways safety standards.

Conclusion

We consider that, as currently presented, this application fails to demonstrate that the proposed development will not result in a significant adverse impact on protected and/or UK Priority species and UK Priority habitat. This is contrary to the NPPF and Mid Suffolk DC Local Plan and we therefore **OBJECT** to this application.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton
Conservation Planner

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

24/01/2018

Dear Rebecca,

**RE: 1856/17 Outline planning application for phased development for the erection of up to 300 homes.
Land off Norwich Road, Barham and Claydon**

Thank you for sending us further details of this application, we previously responded to consultation on this application in our letter of 23rd June 2017. We have read the additional ecological information provided (Agent's Cover Letter (22nd December 2017); Great Crested Newt Mitigation Report (BasEcology, Dec 2017) and Skylark Mitigation Plan (Pigeon, Dec 2017)) and have the following comments:

Protected and/or UK Priority Species

Great Crested Newts

We note the Great Crested Newt Mitigation Report (BasEcology, Dec 2017) provided and understand that this has been developed in accordance with advice provided by Natural England. Whilst we have no objection to the mitigation methodology proposed, we query whether the location of the proposed receptor site is within the proposed open space area at the eastern end of the application site? To provide suitable terrestrial habitat for great crested newts any new habitat will require time to establish and it is therefore essential that, should permission be granted, this habitat is delivered ahead of any development. It must also be ensured that the management plan for this open space ensures that it is managed to maximise its biodiversity value, including for great crested newts, for the life of the development.

Breeding Birds

We note the proposed provision of skylark plots on neighbouring land (Skylark Mitigation Plan (Pigeon, Dec 2017)) to compensate for the loss of potential skylark nesting habitat on the application site. Whilst the provision of such plots has been demonstrated to provide suitable habitat for skylark, it must be ensured that they are delivered in the correct way. All plots should be delivered in accordance with the guidelines set out in Countryside Stewardship option AB4 (Skylark Plots) (<https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4>). It must also be ensured that, should permission be granted, the provision of the plots is made for the lifetime of the development.

Brown Hare

As recognised in the Preliminary Ecological Appraisal (BasEcology, Apr 2017) for this application, the site provides habitat for brown hare which would be lost as a result of the proposed development. Whilst mitigation in the form of buffer planting is proposed, nonetheless there would still be a reduction in the habitat available for this species in this area.

UK Priority Habitats

Hedgerows

We note the agent's comments (Agent's Cover Letter (22nd December 2017)) in relation to the proposed hedgerow loss and the amount of compensation and enhancement planting proposed as part of the development scheme. Any planting should be comprised of appropriate native species of local provenance.

Conclusion

We note the additional information provided in relation to the potential ecological impacts of this proposal. Whilst mitigation and compensation measures have been identified for several of these impacts, the proposed development does still have the potential to result in some adverse ecological impacts. The proposed development should therefore be determined against national and local planning policy, in particular Mid Suffolk Core Strategy policy CS5 and Local Plan policy CL8 which seek to protect the biodiversity value of the district.

Notwithstanding the above, should it be determined that development in this location is acceptable, it should be ensured that the scheme delivers significant ecological enhancements in accordance with the requirements of the National Planning Policy Framework (NPPF). This should be achieved through the production of an ecological mitigation and enhancement strategy.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer
Senior Conservation Planner

Your Ref: MS/1856/17
Our Ref: 570\CON\2037\17
Date: 7th August 2017
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planningadmin@babberghmidsuffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Ipswich
Suffolk
IP6 8DL

For the Attention of: Gemma Walker

Dear Gemma

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/1856/17

PROPOSAL: Outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (with all matters reserved except for access and spine road).

LOCATION: Land Off, Norwich Road, Barham And Claydon

ROAD CLASS:

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

Comments

- The proposed access on the west the sharp bend in the Spine Road requires sufficient forward visibility for southbound traffic when vehicles waiting to turn right; the proposed trees on the verges in this location will need placed so they are not in visibility splays.
- The access for the shared road on the south/west of the development is shown to be approximately 9m from the development spine road junction with Norwich Road. This is considered to be too close to the junction with the highway therefore not giving sufficient visibility.
- If lagoon level is designed to be above the highway, the retaining wall / earthworks must both strong and leak proof to avoid any risks of flooding onto the highway.
- The residential roads will require 1m wide adoptable service strips if there are no footways present.
- We have concerns regarding the number of trips created by the development as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area.

- The proposed spine road that goes through the site and closure of Church Lane could encourage 'rat running' through the proposed layout of the spine road. Motorists travelling westbound could easily turn onto the first road on the left, left again to re-join Church Lane which would still attract motor vehicles to what will be a sustainable corridor to encourage walking and cycling. These 'rat running' vehicles could potentially conflict with the proposed bus diversion through the site as well.
- A safe walking route to the existing primary school (Claydon Primary School) will need to be assessed and identified in the Travel Plan, as the new Primary School is unlikely to be completed during the early phases of the development.
- There needs to be some evidence that the existing bus operators will be willing to divert their bus services through the proposed development spine road to encourage new residents to travel by bus.
- There needs to be further reference in regards to producing a School Travel Plan (in line with Suffolk County Council's guidance) and providing some measures to encourage sustainable transport to the proposed doctors surgery.
- 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.
- Please note, if permeable paving is proposed on this development, this type of road construction will not be adopted by SCC.
- The Illustrative layout drawing shows links to potential future developments; the Traffic assessment does not address these so this response is only for this outline application. Please note, Suffolk Design Guide point 3.3.8 and 3.3.9 regarding access requirements.

Conditions

1 V 1

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing Nos. 1601-86-PL02, PL04, PL05 & PL06 thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action.

2 RSA

Condition: The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied / open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.

3 P 2

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

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

4 ER 1

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

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

5 D 2

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

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

6 ER 2

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

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

7 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.

8 HGV 1

Condition: Prior to the commencement of development within any particular area or phase, details of the construction methodology for that area or phase shall be submitted to and approved in writing by the Local Planning Authority and shall incorporate the following information:-

- a) Details of the hours of work/construction of the development within which such operations shall take place and the hours within which delivery/collection of materials for the said construction shall take place at the site.
- b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.
- c) Details of how construction and worker traffic and parking shall be managed.
- d) Details of any protection measures for footpaths surrounding the site.
- e) Details of any means of access to the site during construction.
- f) Details of the scheduled timing/phasing of development for the overall construction period.
- g) Details of any wheel washing to be undertaken, management and location it is intended to take place.
- h) Details of the siting of any on site compounds and portaloos.
- i) Details of the method of any demolition to take place, including the recycling and disposal of said materials resulting from demolition.

The construction shall at all times be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Reason - To minimise detriment to nearby residential and general amenity by controlling the construction process to achieve the approved development. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, by reason of the location and scale of development may result adverse harm on amenity.

9 LANDSCAPING

Condition: Prior to the commencement of any part of the development, details of the proposed tree planting and landscaping including locations and root management measures shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the Interests of highway safety to prevent damage to the roads and to ensure that visibility splays and street lighting remain unobstructed by proposed planting

10 NOTE 01

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

For further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>. A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

11 NOTE 07

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.

12 NOTE 12

The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer.

S106

Travel Plan

To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and there are certainties that the Travel Plan will be implemented in full; the following Section 106 contribution is required:

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is the longest duration. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.
- Travel Plan Implementation Bond, or cash deposit - £158,900 (£530 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan and. This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves. A rolling bond, one-off Travel Plan Contribution for SCC to deliver the Travel Plan on behalf of the applicant, or any other suitable obligations to guarantee Travel Plan implementation may also be considered.

Public Transport

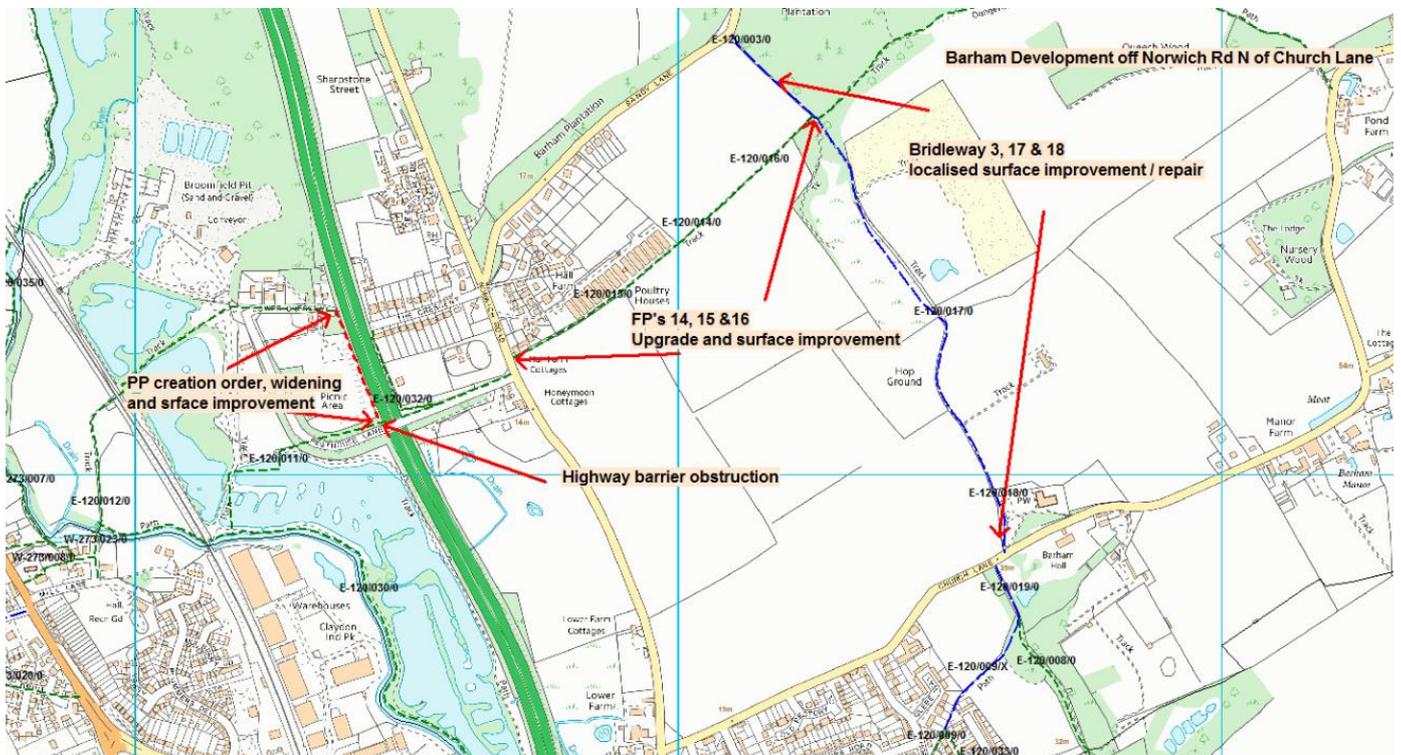
The preference would be for the current service or a new route to make use of the spine road through the site. That would entail the construction of at least one stop (for extension of the loop) or two (for a new or revised route that would serve the development in both directions). Ideally, they would be on the spine road around the junction/crescent area as shown here:



These would be given the standard shelter, raised kerb and RTPI treatment as the best way of encouraging new residents to try the bus. Kerbs and shelter bases would be built as part of the site works, shelters are approximately £5000 each and screens at £10,000 each.

Public Rights Of Way

The proposed development will have a direct impact on the local public rights of way (PROW) network. PROW are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism.



The anticipated increased use of the PROW network of as a result of the development will require the following onsite improvement works, please refer to the attached plan:

Public Footpath FP13, 14 and 16 - Conversion of these public footpaths to bridleway
Public Footway FP11 – general improvements to route and remove obstructions
Bridleway 17 & 18 - improvements to surface material
Barham permissive path – Order to formalise the route, widen and other improvements

The total S106 funding requested from this development is £115,500.

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development – Resource Management

Your Ref: 1856/17
Our Ref: 570\CON\1814\18
Date: 18th July 2018

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

Email: planning@babberghmidsuffolk.gov.uk

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

For the Attention of: Elizabeth Flood

Dear Elizabeth

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN 1856/17

PROPOSAL: Re-Advertisement - Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

LOCATION: Land Off, Norwich Road, Barham And Claydon

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

Comments

Planning applications had been submitted to develop a number sites in and around the villages of Barham, Claydon, Bramford and Sproughton totalling upto 600 dwellings. The cumulative highway impact of these developemnts has been of concern to us as the Highway Authority and to the Local Planning Authority. This letter sets out the reasons for our response. The three aspects of highway impact are considered namely highway safety, conjestion (capacity) and sustainability.

Suffolk County Council carried out an analysis of the applications Transport Assessments for the planning applications:

- 1856/17 – Land off Norwich Road, Barham
- 18/00861 - Land east of Ely Road, Claydon
- 18/00233 – Land to East of The Street, Bramford
- 18/02010 – Land East Side of Bramford Road, Sproughton

The data indicates there are significant/potentially severe delays at key junctions:

- Station Road/Norwich Road Claydon
- Church Road/Ipswich Road Claydon
- Loraine Way/Lower Street/Burstall Road in Sproughton.

These junctions only experience issues during the AM or PM peak hours with the worse performing movements are for right turning vehicles; for instance:

- delays increased by 19 seconds on Station Road arm,
- 48 seconds on Burstall Road and
- queue lengths increasing on Church Road from 11 vehicles to 24.

With the increase in congestion, the concern is traffic may divert onto other routes which are unsuitable for the increase in traffic. Also, pedestrian safety in these built up areas could be compromised where they are trying to cross roads between queuing cars so not visible to other drivers.

The additional traffic generated by the cumulative effect from the developments at these junctions show an increase in queuing and delays for all users therefore, we consider a co-operative approach to give an opportunity to provide improvements to mitigate against the significant impacts. We would like to invite applicants to attend a meeting with the Local Planning Authority and ourselves to discuss further options.

Yours sincerely,

Sam Harvey
Senior Development Management Engineer
Strategic Development

Your Ref: 1856/17
Our Ref: SCC/CON/0007/19
Date: 11 January 2019



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Jo Hobbs

Dear Jo

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: 1856/17

PROPOSAL: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

LOCATION: Land off Norwich Road Barham Ipswich IP6 0NU

ROAD CLASS:

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

COMMENTS

Following the previous response asking for the cumulative effect of developments on junctions in Claydon, Barham, Bramford and Sproughton, meetings have taken place including all the developers for these sites. It has been concluded only this development has an impact on Station Road/Norwich Road and Church Road/Norwich Road junctions. The impact is during the peak hour in the growth year showing significant delays, these are not considered severe. To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below.

CONDITIONS

1 V 1 - Condition: Before the access is first used visibility splays shall be provided as shown on Drawing Nos. 1601-86-PL02, PL04, PL05 & PL06 thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order

1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action.

2 RSA - Condition: The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied / open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.

3 P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points, powered two vehicle provision, secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

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

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

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

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

6 D 2 - Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

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

7 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.

8 HGV 1 - Condition: Prior to the commencement of development within any particular area or phase, details of the construction methodology for that area or phase shall be submitted to and approved in writing by the Local Planning Authority and shall incorporate the following information:-

a) Details of the hours of work/construction of the development within which such operations shall take place and the hours within which delivery/collection of materials

for the said construction shall take place at the site.

b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.

c) Details of how construction and worker traffic and parking shall be managed.

d) Details of any protection measures for footpaths surrounding the site.

e) Details of any means of access to the site during construction.

f) Details of the scheduled timing/phasing of development for the overall construction period.

g) Details and use of any wheel washing to be undertaken, management and location it is intended to take place.

h) Details of the siting of any on site compounds and portaloos.

i) Details of the method of any demolition to take place, including the recycling and disposal of said materials resulting from demolition.

The construction shall at all times be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Reason - To minimise detriment to nearby residential and general amenity by controlling the construction process to achieve the approved development. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, by reason of the location and scale of development may result adverse harm on amenity.

9 LANDSCAPING - Condition: Prior to the commencement of any part of the development, details of the proposed tree planting and landscaping including locations and root management measures shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the Interests of highway safety to prevent damage to the roads and to ensure that visibility splays and street lighting remain unobstructed by proposed planting.

10 S278 - Condition; Prior to occupation of the development, the pedestrian and cycling improvement details at Norwich Road/Station Road junction and Norwich Road/Church Road junctions at to be submitted and approved by the local planning authority. The approved schemes shall be laid out, constructed and made functionally available for use by the occupiers of the development prior to the occupation of the first dwelling and thereafter retained in the approved form for the lifetime of the development.

Reason: To secure pedestrian and cycle facilities in the interests of the sustainable development of the site.

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.

S106 CONTRIBUTIONS

Travel Plan

To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and there are certainties that the Travel Plan will be implemented in full; the following Section 106 contribution is required:

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is the longest duration. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide

sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.

- Travel Plan Implementation Bond, or cash deposit - £158,900 (£530 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan and. This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves. A rolling bond, one-off Travel Plan Contribution for SCC to deliver the Travel Plan on behalf of the applicant, or any other suitable obligations to guarantee Travel Plan implementation may also be considered.

Public Transport

The preference would be for the current service or a new route to make use of the spine road through the site. That would entail the construction of at least one stop (for extension of the loop) or two (for a new or revised route that would serve the development in both directions). Ideally, they would be on the spine road around the junction/crescent area.

These would be given the standard shelter, raised kerb and RTPI treatment as the best way of encouraging new residents to try the bus. Kerbs and shelter bases would be built as part of the site works, shelters are approximately £5000 each and screens at £10,000 each.

Public Rights Of Way

The proposed development will have a direct impact on the local public rights of way (PROW) network. PROW are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism.

The anticipated increased use of the PROW network of as a result of the development will require the following onsite improvement works, please refer to the attached plan:

Public Footpath FP13, 14 and 16 - Conversion of these public footpaths to bridleway

Public Footway FP11 – general improvements to route and remove obstructions

Bridleway 17 & 18 - improvements to surface material

Barham permissive path – Order to formalise the route, widen and other improvements

The total S106 funding requested for PROW from this development is £115,500.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your Ref:1856/17
Our Ref: SCC/CON/4850/19
Date: 4 December 2019



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Jo Hobbs

Dear Jo,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION REF: 1856/17

PROPOSAL: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

LOCATION: Land North West Of, Church Lane, Barham, Suffolk IP6 0NU

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

COMMENTS

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

- The proposal for 269 dwellings would create approximately 161 vehicle movements within the peak hour (3 vehicles every minute) The additional vehicles from the development will affect the capacity of Station Road/Norwich Road junction and Church Lane/Norwich Road, Claydon during short duration of the morning peak hour. The mitigation proposed for the junctions improves the footways for the pedestrians and cyclists to make the area safer for the vulnerable user, especially during peak hours.
- The proposal will include a bus route on the new link road and with good public transport services
- The catchment primary school is approximately 1km from the site. The mitigation measures for footway improvements between the site and the primary school to create a safer route for the vulnerable user.

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

CONDITIONS

Should the Planning Authority be minded to grant planning approval the Highway Authority in Suffolk would recommend they include the following conditions and obligations:

V 1 - Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 1601-86-PL02, PL04, PL05 & PL06. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

RSA - Condition: The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied / open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.

TP1 - Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised Travel Planning and a multi-modal travel voucher.

Reason: In the interest of sustainable development as set out in the NPPF, and objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

TP2 - Condition: Prior to the occupation of any dwelling details of the travel arrangements to and from the site for residents of the dwellings, in the form of a Travel Plan shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority. This Travel Plan must be based on the submitted Framework Travel Plan (dated February 2017). 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 objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points, powered two vehicle provision, secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

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

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

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

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

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.

D 2 - Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

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

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.

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.

S106 CONTRIBUTIONS

Travel Plan

A Section 106 obligation to secure a "Travel Plan Travel Plan Evaluation and Support Contribution" of £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is the longest duration is required to support the proposed planning conditions. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the Travel Plan, as they have been identified in the monitoring process. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the Travel Plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.

Public Transport

The preference would be for the current service or a new route to make use of the spine road through the site. That would entail the construction of at least one stop (for extension of the loop) or two (for a new or revised route that would serve the development in both directions). Ideally, they would be on the spine road around the junction/crescent area.

These would be given the standard shelter, raised kerb and RTPi treatment as the best way of encouraging new residents to try the bus. Kerbs and shelter bases would be built as part of the site works, shelters are approximately £5000 each and screens at £10,000 each.

Public Rights Of Way

The proposed development will have a direct impact on the local public rights of way (PROW) network. PROW are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism.

The anticipated increased use of the PROW network of as a result of the development will require the following onsite improvement works, please refer to the attached plan:

Public Footpath FP13, 14 and 16 - Conversion of these public footpaths to bridleway

Public Footway FP11 – general improvements to route and remove obstructions

Bridleway 17 & 18 - improvements to surface material

Barham permissive path – Order to formalise the route, widen and other improvements

The total S106 funding requested for PROW from this development is £115,500.

Village Highway Mitigation Measures

The package of measures includes Station Road / Norwich Road Junction and Church Lane / Norwich Road Junction, footway improvements and village-wide Cycle and pedestrian Infrastructure Improvement Works and Norwich Road extension of Speed Limit.

The total cost of these works are estimated at £98,250 to be apportioned between this and Norwich Road application.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

From: Highways PROW Planning <PROWplanning@suffolkhighways.org>
Sent: 22 January 2019 14:02
To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>
Cc: Sam Harvey <Sam.Harvey@suffolk.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - 1856/17

For The Attention of: Jo Hobbs

Public Rights of Way Response

Thank you for your consultation concerning the above application.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Bridleway 18 is recorded adjacent to the proposed development area.

Whilst we do not have **any objections** to this proposal, the following informative notes apply.

Informative Notes

The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

To apply to carry out work on the Public Right of Way or seek a temporary closure, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

To apply for structures, such as gates, on a Public Rights of Way, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in

writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.

3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.
5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
 - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
 - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
 - **Restricted byway** – has similar status to a bridleway, but can also be used by a 'non-motorised vehicle', for example a **horse and carriage**.
 - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

More information about Public Rights of Way can be found at www.suffolkpublicrightsofway.org.uk

Jennifer Green

Rights of Way and Access

Growth, Highways and Infrastructure, Suffolk County Council
Suffolk Highways, Phoenix House, Goddard Road, Ipswich, IP1 5NP

From:Chris Ward
Sent:23 Jun 2017 09:35:40 +0100
To:Gemma Walker
Cc:BMSDC Planning Area Team Green;Sam Harvey
Subject:RE: Planning Consultation Request - 1856/17

Dear Gemma,

Thank you for consulting me in regards to the proposed residential development at Land Off Norwich Road, in the Barham and Claydon area. I will be providing a response in regards to the Travel Plan that was submitted to identify and deliver highway mitigation through promoting sustainable transport to the residents. However to comply with internal protocol this will form part of the detailed SCC Highway response.

If this causes you any issues please let me know as soon as possible.

Kind regards

Chris Ward
Travel Plan Officer
Development Management
Resource Management
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
Telephone: 01473 264970
Mobile: 07860 832202
email : chris.ward@suffolk.gov.uk
web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

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

From: planninggreen@babberghmidsuffolk.gov.uk [<mailto:planninggreen@babberghmidsuffolk.gov.uk>]
Sent: 06 June 2017 14:13
To: Chris Ward <Chris.Ward@suffolk.gov.uk>
Subject: Planning Consultation Request - 1856/17

Please find attached planning consultation request letter relating to planning application - 1856/17 - Land Off Norwich Road, Barham And Claydon, ,

Kind Regards

Planning Support Team

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Faye Minter
Direct Line: 01284 741228
Email: Faye.minter@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2017_1856
Date: 26th June 2017

For the Attention of Gemma Walker

Dear Mr Isbell

**Planning Application 1856/17 – Land Off Norwich Road Barham And Claydon:
Archaeology**

This large site is situated in a topographically favourable location for archaeology of all periods, overlooking the River Gipping. Within the site itself, extensive scatters of Iron Age, Roman, Anglo-Saxon, medieval and post-medieval finds are recorded on the County Historic Environment Record (BRN 016, 027 and 030). In 2016 pre work was conducted on the site (excluding the reserved site for a primary school). This work included a geophysical survey, assessment of previous metal detected finds from the site and a trial trench evaluation of 3.5%.

This work showed activity on the site from the Neolithic through the Bronze Age and Iron Age. Settlement continued through the transition to Roman rule and on into the Anglo-Saxon period. Analysis of the metal detected finds suggests high status Anglo-Saxon activity to the most north easterly part of the site with direct evidence of settlement shown by the excavation of a sunken featured building, containing an inhumation radiocarbon dated to the late sixth-early seventh centuries, and the identification of a buried dark earth deposit. Evidence of further probable Anglo-Saxon structures was identified in the form of a number of postholes. The Anglo-Saxon evidence therefore appears to indicate the presence of a high status middle to late Anglo-Saxon settlement, which is of potentially national importance. This settlement probably relates to the Anglo-Saxon Church of St Mary's, which is located on the edge of the proposed development area (BRH 017).

There is very high potential for extensive below ground archaeological remains to survive within this proposed development area. Groundworks associated with development have the potential to damage or destroy any surviving archaeological remains.

I am yet to receive the final phased trench plan so our advice could still be subject to minor changes relating to exactly where the residential development begins. However, based on the plans currently proposed the north easterly most sensitive, and potentially nationally important Anglo-Saxon part of the site, which we recommend should be preserved *in situ*, would remain largely if not wholly undisturbed. This area of the site should not have any ground disturbance of any kind and therefore the track and Church carpark indicated would have to be built up to avoid damaging the archaeology. It would also mean that this area of the site would not be a suitable place on which to put a site compound or plant trees.

If this area of the site is left preserved *in situ*, as shown on the current proposed plans, there will be no grounds to consider refusal of permission as the destruction of the archaeology on the rest of the site can be mitigated by excavation. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following 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

mitigation. In this case, on the areas not preserved *in situ* an archaeological excavation will be required before any groundworks commence, the excavation areas can be defined based on the results of the evaluation already conducted in the main area but further evaluation trenching will also be needed in the area reserved for a primary school if this comes forward to inform whether further work is also needed there.

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,

Faye Minter

Senior Archaeological Officer
Conservation Team

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

Philip Isbell
Head of Planning
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Enquiries to: Faye Minter
Direct Line: 01284 741228
Email: faye.minter@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 1856/17
Date: 23/05/18

For the Attention of Elizabeth Flood

Dear Mr Isbell

Planning Application 1856/17 Land off Norwich Road, Barham and Claydon: Archaeology

This site is situated in a topographically favourable location for archaeology of all periods, overlooking the River Gipping. Within the site itself, extensive scatters of Iron Age, Roman, Anglo-Saxon, medieval and post-medieval finds are recorded on the County Historic Environment Record (BRN 016, 027 and 030). The Anglo-Saxon finds assemblage alone appeared to indicate the presence of a high-status middle to late Anglo-Saxon settlement, which is of potentially national importance. This settlement probably relates to the Anglo-Saxon Church of St Mary's, which is located on the edge of the proposed development area (BRH 017). A number of other multi-period scatters have also been recorded in fields surrounding the site (BRH 007, 018, 025 and 045). Archaeological investigations at Barham quarry have revealed extensive remains of prehistoric and Roman occupation, including kilns and ovens (BRH 006, 013, 015 and 043), alongside a number of medieval human skeletons (BRH 009). As a result there is very high potential for extensive below ground archaeological remains to survive within this proposed development area. Groundworks associated with development have the potential to damage or destroy any surviving archaeological remains.

Due to this high archaeological potential a first phase of archaeological evaluation was recommended and undertaken at pre-application in 2016 (SACIC Report No. 2016/078). This work included a geophysical survey and a trenched evaluation at 3.5%. The work defined important archaeological remains, the most significant of which was the discovery of a well preserved high-status Anglo-Saxon settlement, at the top of the site, immediately west of the Church (please see the red outlined area on the map below). These remains are considered to be of national significance and therefore, we would advise that they should be treated as equivalent in significance to a Scheduled Ancient Monument, as specified by paragraph 139 of the NPPF. Consequently, we advise that these remains should be preserved *in situ*, beneath an area of open space, which must not be subject to any ground disturbance. We propose that this area of archaeology should be preserved under grassland, which would provide optimum protection.

Further down the site the pre-application evaluation (please see the blue outlined area on the map below) found other archaeological remains of Bronze Age, Iron Age and Roman date, therefore we would recommend that some areas of archaeological excavation will be needed in this area, where these remains would otherwise be destroyed, these can be defined from the evaluation results and be undertaken by condition.

The third area (please see the yellow outline on the map below) has not yet been subject to any archaeological investigation and we would recommend an evaluation by condition to inform any future mitigation strategy.

Regarding the illustrative Landscape Masterplan which has now been submitted as part of outline application 1856/17, although we were pleased to see that the Anglo-Saxon settlement area has been removed from the revised development plans the current application proposes to retain the part of this Anglo-Saxon settlement under arable cultivation. This will have a significant negative impact on surviving below ground heritage assets in this area – i.e. they are likely to be gradually destroyed. There are also new large trees proposed, which would also damage the archaeological remains; less deep-rooted vegetation would be considered more appropriate. In addition, a new road and parking area for the Church are also planned within the extent of the area of the Anglo-Saxon settlement, which, as previously discussed with the applicant, would only be acceptable if the road and car park were built up and no ground disturbance occurred. Consequently, we would advise that the new scheme should be **refused** in its current form.

If development plans are amended, so that the defined area of Anglo-Saxon settlement is entirely removed from development and cultivation, with no below ground disturbance planned, and maintained entirely under grass in order to ensure the preservation of these archaeological remains in situ, we would not have an objection to the scheme.

However, we would advise that this application would need to be the subject of a planning condition, in accordance with the National Planning Policy Framework (Paragraph 141), to record and advance understanding of the significance of other below ground heritage assets at this site before they are 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 Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

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

INFORMATIVE:

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological investigation.

Outside of the area where preservation in situ has been recommended and where other archaeological remains were defined during the 2016 evaluation (the blue area on the map below) areas of archaeological excavation will be required before any groundworks commence. Further archaeological evaluation will also be required to establish the potential of the site in the area which has not yet been subject to any investigation (the yellow area on the map below) and decisions on the need for any further investigation in this area (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

We would also ask that a document is submitted which outlines the strategy for preserving the area of the Anglo-Saxon settlement in situ (the red area on the map below). We require written confirmation that no groundworks (including ploughing, site stripping, landscaping, planting, services, fencing, attenuation or machinery movement etc) will be undertaken in this part of the site. In addition, the measures which will be put in place to ensure that no ground disturbance will occur in this area both during and post construction works will need to be outlined and agreed. We understand that part of the area is to be given to the Church and we will need written confirmation that they understand that no ground disturbance, including use as a cemetery can be undertaken in the area in the future.

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,

Faye Minter
Senior Archaeological Officer
Conservation Team



Key:

Red outline area: Recommended preservation in situ under grassland with no ground disturbance

Blue outline area: Recommended that areas of excavation will be needed within this area, these can be defined from the trenching and geophysical results and be done by condition

Yellow outline area: Recommended that this area needs evaluation by condition to enable decisions about further work to be made.

From: Faye Minter <Faye.Minter@suffolk.gov.uk>
Sent: 15 January 2019 16:28
To: BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>; Planning Contributions Mailbox <planningcontributions.admin@suffolk.gov.uk>; Jo Hobbs <Jo.Hobbs@babberghmidsuffolk.gov.uk>
Cc: Neil McManus <Neil.McManus@suffolk.gov.uk>; Abby Antrobus <Abby.Antrobus@suffolk.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - 1856/17

Dear All,

I am contacting you regarding the new Illustrative Landscape Masterplan that has been submitted for the above, see attached.

I think that this new plan addresses many of the concerns SCCAS had previously raised, see attached my previous comments regarding archaeology.

The preservation in situ area is now under grassland as requested rather than arable land and planting in sensitive archaeological areas has been flagged as needing to use shallow rooted plants.

However, it does need to be explicit that the new road and carpark in this area will be built up and involve no ground disturbance and we would also request that an Archaeological Management Plan be submitted outlining the strategy for preserving the area of the Anglo-Saxon settlement in situ. We require written confirmation that no groundworks (including ploughing, site stripping, landscaping, planting, services, fencing, attenuation or machinery movement etc) will be undertaken in this part of the site. In addition, the measures which will be put in place to ensure that no ground disturbance will occur in this area both during and post construction works will need to be outlined and agreed. We understand that part of the area is to be given to the Church and we will need written confirmation that they understand that no ground disturbance, including use as a cemetery can be undertaken in the area in the future. On other projects the LPA have created conditions specifically relating to such Management plans.

This information would then remove any objections related to archaeology.

Please do not hesitate to contact me if you need any further information.

Best wishes, Faye

Faye Minter BA (hons), MA, FSA

Senior Archaeological Officer
Suffolk County Council Archaeological Service, Bury Resource Centre, Hollow Road, Bury St Edmunds, IP32 7AY
Tel: 01284 741228
Mob: 07917598760
Email: faye.minter@suffolk.gov.uk
Web site: www.suffolk.gov.uk/archaeology Heritage Explorer <http://heritage.suffolk.gov.uk>

Your ref: 1856/17
Our ref: Barham and Claydon – land off
Norwich Road 00045828
Date: 15 May 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Ms Elizabeth Flood,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Elizabeth,

Barham and Claydon: land off Norwich Road – developer contributions

I refer to the proposal: re-advertisement – outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

This consultation response letter updates and replaces previous consultation response letters.

This letter sets out the infrastructure requirements which arise. This consultation response considers the cumulative impacts of housing growth on primary school provision.

Ideally, the County Council would like to see a plan-led approach to housing growth in the Claydon locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including primary school provision. To not consider and address the cumulative impacts of growth will result in a sub-optimal outcome for education provision in the Claydon locality – this would be contrary to the principles of delivering sustainable development, which is the golden thread running through the NPPF. There are numerous 'hooks' within the NPPF which support the County Council's position.

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April

2017) – with an initial consideration by the District’s planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

In paragraph 187 of the NPPF it states “Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.” The County Council’s positive solution to addressing the unacceptable impacts of the proposed development on education infrastructure is to secure a planning obligation to mitigate the harm arising in respect of primary education provision.

And in paragraph 17 of the NPPF it states, “Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking.” One of these 12 principles say that planning should “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” The strategy of delivering a new primary school in the Claydon locality to meet local needs ensures that housing growth, including this proposed development, is sustainable in respect of the NPPF and local plan policies.

The current planning application in Barham & Claydon under reference 1856/17 being promoted by Pigeon Investment Management is for outline consent for up to 270 homes and includes a reserved site for a new pre-school and a new primary school. This position reflects the strategic requirement for a new primary school in the locality. I would suggest that for the Pigeon scheme, the offer of land for a new primary school should be given significant weight in planning terms – especially in the absence of an up-to-date local plan with the lack of a 5-year housing land supply and no site allocations including school sites in this locality.

The High Court recently ruled in *Amstel Group Corporation v Secretary of State for Communities and Local Government & Anor* [2018] EWHC 633 that a planning inspector gave insufficient weight to the benefits a school to be provided by a developer would bring to a locality. This failure to weigh benefits of a new school resulted in the appeal decision under reference APP/Y2620/W/16/3150860 being quashed. Lang J said: “Regrettably I have concluded that the inspector fell into error here... he did correctly weigh in the balance the claimant's potential contribution to additional school places for the 50 pupils generated by the development, but he did not also weigh in the balance the benefits of a new school, which on the evidence, could provide improved and enlarged facilities, thus benefiting existing pupils as well as new ones.”

Schemes in the locality currently on our radar include:

- a) Reference DC/18/00233/OUT – application in Bramford for 225 dwellings.
- b) Reference 1856/17 – this scheme for 270 dwellings.
- c) Reference 1832/17 – scheme for 315 dwellings in Claydon. Recently refused but is to go to appeal.
- d) Reference DC/17/04720 – scheme in Claydon for 74 dwellings.
- e) Great Blakenham – Blakenham Fields scheme – approved scheme of 426 dwellings currently being built out by Bellway Homes.

- f) Great Blakenham, land west of Stowmarket Road – approved scheme of 130 dwellings.
- g) Great Blakenham, Kingfisher Drive – approved scheme for 10 dwellings.
- h) Bramford, Paper Mill Lane – approved scheme of 176 dwellings.
- i) Bramford, land east of The Street – approved scheme of 130 dwellings.
- j) Bramford, Clarice House – pre-application enquiry under references 3520/16 & IP/16/00096/PREAPP for 122 dwellings.
- k) Refer to the SHELAA.
- l) The above gives a cumulative total of at least 1,878 dwellings in the locality. Based on our standard methodology of 25 primary-age pupils for every 100 dwellings that generates the need for a 420-place primary school.

The National Planning Policy Framework (NPPF) paragraph 204 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 will charge 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 would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

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

The details of the impact on local infrastructure serving the development is set out below and, apart from the proportionate section 106 developer contributions towards the land and build costs of a new primary school, will form the basis of a future CIL bid for funding:

1. **Education.** Refer to the NPPF paragraph 72 which states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

SCC anticipates the following **minimum** pupil yields from a development of 270 dwellings, namely:

- a. Primary school age range, 5-11: 66 pupils. Cost per place is £16,429 (2018/19 costs).
- b. Secondary school age range, 11-16: 48 pupils. Cost per place is £18,355 (2018/19 costs).
- c. Secondary school age range, 16+: 10 pupils. Costs per place is £19,907 (2018/19 costs).

The local catchment schools are Claydon Primary School, Claydon High School and One.

Based on existing forecasts SCC will have no surplus places available at the catchment secondary schools for which future CIL funding of at least £1,080,110 (2018/19 costs) will be sought.

The Claydon Primary School expansion planning application received a resolution to grant planning permission by the County Council's Development and Regulation Committee at its meeting on 16 January 2018. This is subject to the prior completion of a planning obligation and the imposition of planning conditions. The aim is to complete the project for the expansion of the school up to 525 places by September 2019. This expansion project will not deal with pupils arising from this proposed development. The entry in the County Council's Budget Book is for a 'contractually committed scheme' which is a project for the expansion of Claydon Primary School up to 525 places. Refer to Cabinet meeting reports for meeting to be held on 23 January 2018 under agenda item 7 – Revenue Budget 2018-19 and Capital Programme 2018-21 – Appendix C – Annex E.

Due to the current uncertainty over the scale, location, and distribution of housing growth in the locality it is presently not clear what the most sustainable approach for primary school provision is, but nonetheless:

- a) The current Claydon Primary School is forecast to be at capacity taking into account pupils arising from basic need and those arising from schemes with planning permission.
- b) Based on developer-led growth a site of a minimum size of 2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
- c) Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 66 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school.
- $\text{£6.9m} / 420 \text{ places} = \text{£}16,429$ per pupil place.
- From 270 dwellings it is forecast that 66 primary age pupils will arise.
- Therefore, $66 \text{ pupils} \times \text{£}16,429 \text{ per place} = \text{£}1,084,314$ (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 £494,200 for a 2-hectare site and equates to £1,177 per pupil place. For the proposed development, this equates to a proportionate land contribution of $66 \text{ places} \times \text{£}1,177 \text{ per place} = \text{£}77,682$.

In respect of the developer contributions sought to mitigate the harm arising from this proposed scheme the following trigger points are required:

- a) Build cost contribution (BCIS linked) of £1,084,314 (2018/19 costs) to be payable in 4 equal instalments – triggers being 25% prior to 50th, 125th, 175th & 225th dwelling occupations. To be secured by way of a planning obligation.
- b) Land contribution of £77,682 to be payable prior to first dwelling occupation. To be secured by way of a planning obligation.
- c) The developer contributions will be secured for a period of up to 10 years and returned if not spent.

Use of the developer contributions – to be used towards the site acquisition and build costs of a new primary school in the locality to serve the new pupils of the proposed development. The developer contributions will be secured for a period of up to 10 years and returned if not spent. A clause included in the planning obligation that will enable the full developer contributions to fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development.

It is proposed that the school site can be separately accessed and serviced, so that the school delivery is not dependent on the housing delivery. An important issue to resolve will be delivering sustainable and safe walking & cycling routes to the new school.

- 2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

From these development proposals SCC would anticipate up to 27 pre-school children arising.

This proposed development is in the Claydon & Barham ward, where there is an existing surplus of places.

- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
- 4. Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle

provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

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

5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £58,320, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
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.

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic population. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a

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

- 8. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the Secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that, in considering planning applications:

"Local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

The changes set out in the MWS took effect from 06 April 2015.

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

- 9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
- 10. Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.
As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the

development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

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

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

Apart from the planning obligation requirements for the primary school land and build costs, the above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

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

If the District resolve to grant planning permission subject to the prior completion of a planning obligation based on the above terms to mitigate the harm on local primary education provision, then any objections the County Council has to the proposed development in respect of primary education provision will fall away as adequate mitigation will be secured.

Yours sincerely,

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

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

Your ref: 1856/17
Our ref: Barham and Claydon – land off
Norwich Road 00045828
Date: 12 June 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Ms Gemma Walker,
Planning Services,
Mid Suffolk District Council,
Council Offices,
131 High Street,
Needham Market,
Ipswich,
Suffolk,
IP6 8DL

Dear Gemma,

Barham and Claydon: land off Norwich Road – developer contributions

I refer to the outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (with all matters reserved except for access and spine road).

This letter sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site specific mitigation. This consultation response considers the cumulative impacts of housing growth on primary school provision.

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

Site specific matters will be covered by a planning obligation or planning conditions.

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

The National Planning Policy Framework (NPPF) paragraph 204 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 will charge 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 would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

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

The details of the impact on local infrastructure serving the development is set out below and, apart from the proportionate developer contributions towards the land and build costs of a new primary school, will form the basis of a future CIL bid for funding:

- 1. Education.** Refer to the NPPF paragraph 72 which states ‘The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education’.

The NPPF at paragraph 38 states ‘For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.’

SCC anticipates the following **minimum** pupil yields from a development of 300 dwellings, namely:

- a. Primary school age range, 5-11: 75 pupils. Cost per place is £12,181 (2017/18 costs).
- b. Secondary school age range, 11-16: 54 pupils. Cost per place is £18,355 (2017/18 costs).
- c. Secondary school age range, 16+: 12 pupils. Costs per place is £19,907 (2017/18 costs).

The local catchment schools are Claydon Primary School, Claydon High School and One.

Based on existing forecasts SCC will have no surplus places available at the catchment secondary schools for which CIL funding of at least £1,230.054 (2017/18 costs) will be sought.

At the primary school level the current thinking is the emerging need for a new primary school in the locality taking into consideration housing growth. This need will become clearer when overall housing numbers and likely locations are identified by the District. Ideally this would be identified in a plan-led approach but at present there is a large amount of developer-led growth. Based on this current situation it is therefore considered appropriate to secure a land reservation within this scheme for education use plus proportionate developer contributions to fund the delivery of a new primary school.

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

1. The current Claydon Primary School is at capacity and there is a capital project being pursued to expand it to 630 places in order to deal with existing growth in the locality. Further expansion of this school beyond 630 places is not a tenable option.

2. Whichever strategy is the most appropriate a site of a minimum size of 2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
3. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 75 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school.
- £6.9m/420places = £16,429 per pupil place.
- From 300 dwellings it is forecast that 75 primary age pupils will arise.
- Therefore 75 pupils x £16,429 per place = £1,232,175 (2017/18 costs).

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £494,200 for a 2 hectare site and equates to £1,177 per pupil place. For the proposed development, this equates to a proportionate land contribution of 75 places x £1,177 per place = £88,275. However as this proposed development, if granted planning permission, will include a fully serviced site for the new primary school which is to be transferred to Suffolk County Council, this will result in the payment of a maximum contribution to the applicant of £100,000 per acre less the proportionate land contribution cost of £88,275 directly arising from this proposed development.

It is proposed that the school site can be separately accessed and serviced, so that the school delivery is not dependent on the housing delivery. An important issue to resolve will be delivering sustainable and safe walking & cycling routes to the new school.

2. **Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds. From these development proposals SCC would anticipate up to 30 pre-school pupils.

In the Ward of Claydon and Barham there is a surplus of places predicted in September 2017. On this basis no CIL funds will be sought for this proposed development.

Please note that the early years pupil yield ratio of 10 children per hundred dwellings is expected to change and increase substantially in the near future. The Government announced, through the 2015 Queen's Speech, an intention to double the amount of free provision made available to 3 and 4 year olds, from 15 hours a week to 30.

3. Play space provision. Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

4. Transport issues. Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Christopher Fish.

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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.

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ensure that the maintenance and operation requirements are economically proportionate.”

The changes set out in the MWS took effect from 06 April 2015.

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

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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.

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

Yours sincerely,

Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Strategic Development – Resource Management

cc Carol Barber, Suffolk County Council
Christopher Fish, Suffolk County Council
Floods Planning, Suffolk County Council

Your ref: 1856/17
Our ref: Barham and Claydon – land off
Norwich Road 00045828
Date: 04 January 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Ms Rebecca Biggs,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Rebecca,

Barham and Claydon: land off Norwich Road – developer contributions

I refer to the proposal: outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 300 homes, including 7 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Reason(s) for re-consultation: Change of description from 8 to 7 self-build plots and additional information dated 22/12/2017.

I previously submitted a consultation response by way of letter dated 12 June 2017, which still stands. I have no further comments to make but colleagues who deal with highway and flood planning matters may have additional comments to make.

Yours sincerely,

Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Strategic Development – Resource Management

cc Christopher Fish, Suffolk County Council
Floods Planning, Suffolk County Council

From: Graham Gunby <graham.gunby@suffolk.gov.uk>
Sent: 07 February 2019 11:05
To: Jo Hobbs <Jo.Hobbs@babberghmidsuffolk.gov.uk>
Cc: Cameron Clow <Cameron.Clow@suffolk.gov.uk>
Subject: RE: Planning applications in Barham and Claydon

Hi Jo

I have looked at these applications within the context of both the Suffolk Minerals Core Strategy (MCS) Adopted 2008 and the Submission Draft Minerals & Waste Local Plan 2018 (SMWLP), which is now a material consideration. All of the sites are shown to be within Minerals Consultation Areas under the higher resolution SMWLP Minerals and Waste Safeguarding and Proposed Sites map. The corner of 1856/17 also clips the SMWLP safeguarding area for the Barham Quarry.

The closeness of these sites to existing housing precludes the quarrying of the underlying sand and gravel to a large extent although as sustainable alternative developers should use where possible the underlying sand and gravel in the construction of the sites. In addition 1856/17 should include any mitigation required to protect residents from the existing quarry and also not prejudice the development of the proposed extensions to the quarry (consideration in this instance should include potential noise, dust and visual impacts although may not be very significant. Further information can be found on the SCC website by following the link provided below. Look under previous consultations to find the Submission Draft SMWLP.

<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/>

Regards

Graham Gunby

Development Manager
Growth, Highways & Infrastructure Directorate
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
Suffolk IP1 2BX

Tel: 01473 26**4807**

E-mail: graham.gunby@suffolk.gov.uk

Website: www.suffolk.gov.uk

For more information about our minerals and waste planning service go to:
<http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/>

From:RM Floods Planning
Sent:30 Jun 2017 10:29:05 +0100
To:BMSDC Planning Area Team Green
Cc:Gemma Walker
Subject:2017-06-30 JS reply Land Off Norwich Road, Barham And Claydon Ref 1856/17

Dear Gemma Walker,

Subject: Land Off Norwich Road, Barham And Claydon Ref 1856/17

Suffolk County Council, Flood and Water Management have reviewed application ref 1856/17.

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

1. Flood Risk Assessment and Drainage Strategy (*including appendices*) ref 617736-REP-CIV-FRA rev 6 (*foul water element of document not reviewed*)
2. Illustrative Landscaping Masterplan ref BMD.16.013.DR.001
3. Location Plan ref 016 - 013 – 001 Rev A
4. Site Layout ref 016 - 013 – 002 Rev A
5. Existing Site Levels Plan ref 016 - 013 – 003 Rev A

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

1. Concurrent with the first reserved matters application 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 flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
2. The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

3. Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

4. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

5. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water

management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864

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

From: planninggreen@baberghmidsuffolk.gov.uk [mailto:planninggreen@baberghmidsuffolk.gov.uk]

Sent: 06 June 2017 14:13

To: RM Floods Planning <floods.planning@suffolk.gov.uk>

Subject: Planning Consultation Request - 1856/17

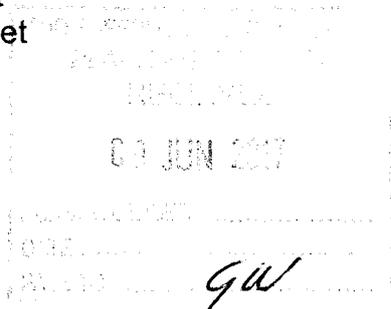
Please find attached planning consultation request letter relating to planning application - 1856/17 - Land Off Norwich Road, Barham And Claydon, ,

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please 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.

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL



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

Your Ref:
Our Ref: FS/F216207
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 07/06/2017

Dear Sirs

Land North West of Church Lane, Barham IP6 0QE
Planning Application No: 1856/17 + S106

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 Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

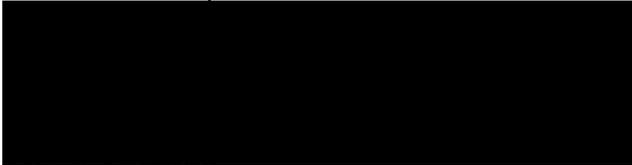
OFFICIAL

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

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

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Ms J Richardson, Beacon Planning Ltd, 8 Quay Court, Colliers Lane,
Stow-cum-Quy, Cambs CB25 9AU
Enc: Sprinkler information

Planningcontributions.admin@suffolk.gov.uk

Suffolk Fire and Rescue Service

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

Your Ref:
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 7 June 2017

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

SCANNED

12 JUN 2017

Planning Ref: 1856/17 + S106

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land NW or Church Lane, Barham IP6 0QE
DESCRIPTION: 300 dwellings, 8 self build plots, pre-school, school
NO: HYDRANTS POSSIBLY REQUIRED: Required

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

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

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

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

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

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen
Water Officer

OFFICIAL



Planning Application (1856/17)

SITE: Land off Norwich Road, Barham And Claydon for 300 dwellings and a Surgery

Applicant: Pigeon Investment Management Ltd

Planning Officer: Ms Gemma Walker

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

Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

Dear Ms Walker

Thank you for allowing me to provide an input for the above Outline Planning application for the proposed development of 300 dwellings, a Doctor's surgery and Primary School at land off Church Lane and Norwich Road, Barham and Claydon.

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

I realise as this is an outline proposal further details will be forthcoming at the reserved matters stage, **however, I have a number of concerns regarding this application.**

- 1.0 I applaud that the main design facilitates the back to back design of the properties, with no rear alleyways.**
- 1.1 I have concerns around the lack of natural surveillance and security due to the use of carports and the positioning of most of the garages, which are set back too far, allowing the opportunity for crime, into a home owner's rear garden.**
- 1.2 I also have concerns that two undercrofts have been designed, leading into rear courtyard car parking. Such areas introduce access to vulnerable rear elevations of dwellings where the majority of burglary is perpetrated and can provide concealment, which can also encourage anti-social behaviour.**
- 1.3 I trust that the planting for the properties bordering the north western side by Norwich Road, will have low lying vegetation to no more than a height of one metre, so that it can be easily maintained and allow surveillance of that area.**
- 1.4 I have concerns at how the proposed village green and play area at note nine is so close to Church Lane, however, I understand traffic within that area should decrease with the implementation of the new spine road. I would still like to see one metre hooped railing within this area and know that there will be local surveillance provided from nearby housing.**

- 1.5 I have concerns that the footpath on the eastern side of the development could be a generator for crime and I would like to see that area well lit.
- 1.6 I have concerns over the location of the Doctor's Surgery being so close to the main road, however, I understand owing to the nature of the incline landscape this was a more subtle area to sight it.
- 1.7 I strongly recommend that the surgery is built in line with Secure By Design principles and that the developers contact me in order to make sure the best possible security is implemented.

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

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

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

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

2.0 **OBSERVATIONS**

- 2.1 My general observations for this development are that I applaud the designer's comments that the proposals are intended to meet the feel good factor for the development. However in order to have this feel good factor you need good security.
- 2.1 I would urge caution in sighting the car ports and garages so far back, as such locations tend to lack any form of natural or formal surveillance to prevent, in particular theft from motors. Police prefer garages to car ports as they provide far more security.
- 2.2 Should a number of car ports be implemented, I strongly recommend that they are in line with the main property and not set back. That dusk to dawn security lighting is installed to the side of the properties overlooking such installations and if possible the front of the car port is secured with lockable gates. (SBD New Homes 2016, page 62, Para 52.1 refers).
- 2.3 Similarly putting the garages so far back again hinders surveillance and makes it easier for an offender to access the side of residents back gardens.
- 2.4 I have serious concerns at the rear parking assigned, particularly within the area to the north of the new spine road and east of a play area, which also has two undercrofts that will lead into rear courtyard parking.

Police nationally do not recommend rear car parking as it tends to provide very little, if any surveillance. Communal parking should be in small groups, close and adjacent to the front or side of homes and must be within view of active rooms that will provide natural surveillance. (SBD New Homes 2016, page 62, Para 52.1 refers).

Should a number of car ports be implemented, I strongly recommend that they are in line with the main property and not set back. That dusk to dawn security lighting is installed to the side of such properties that conforms to BS5489:2013 and that at the entrance to these two undercrofts security gates are fitted that meet BS EN 13241-1 safety standards.

- 2.5 There should be good natural surveillance of properties and vehicle parking as preferred by police Secure By Design principles.

It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling for residents and passers-by.

- 2.6 Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.
- 2.7 For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.
- 2.8 Properties with gable end windows that look onto public spaces is a police preferred preference of design that allows natural surveillance of the area to reduce the risk of graffiti, other forms of criminal damage, or inappropriate loitering. Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.
- 2.9 I would refer the developers to SBD 2016, page 18 on “Dwelling Boundaries”, which outlines the importance of how the boundary between public and private areas should be clearly indicated.

The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community.

Further information on the security of footpaths can be found within “SBD New Homes 2016”, (pages 14-17 at Paras 8.1-8.19 refer).

3.0 SECURE BY DESIGN (SBD)

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a ‘fortress environment’.

4.0 REFERRALS

- 4.11** Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.
- 4.12** The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.

4.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

4.3 Department for Transport – Manual for Streets (Crime Prevention)

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

Safer Places highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN) 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.

- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

5.0 GENERAL COMMENTS ON PROPOSED PLAN

My specific observations for this development are as follows: (Further details of the following recommendations can be found in the above SDB document “Homes16”).

5.1 I would also like to see 1 metre metal hooped railings around all communal areas.

5.2 Should any play equipment be installed it should meet BS EN 1176 standards and be disabled friendly. I Would recommend that any such area has suitable floor matting tested to BS EN1177 standards.

5.3 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.

5.4 All litter bins should be of a fire retardant material.

5.5 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading “Communal Areas” refers.

5.6 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.

5.7 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer’s recommendations. (SBD NH 2016 Para. 21.17).

6.0 CONCLUSION

6.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.

6.2 As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards
http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf

6.3 SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>

6.4 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police police approved minimum security standard and also achieves ADQ, involves the following:

- a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
- b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
- c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

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

7.0 FINAL CONCLUSION

As stated I have concerns with regard to the positioning of the garages, that car ports are also being used instead of garages and that two undercrofts leading to rear parking courtyards have been factored in. I would also strongly like to see that any potential Surgery within this location is built to Secure By Design standards.

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

Yours sincerely

Phil Kemp

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



15 August 2017

Ben Elvin
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

By email only

Hi Ben

Application: 1832/17

Location: Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon

Proposal: Outline Application (with some matters reserved) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works.

Thank you for consulting Place Services on the above application. Subsequent to Natural England's recent consultation response, I have revised comments to make:

HOLDING OBJECTION:

As the sites lies within the 13km Zone of Influence for the Stour & Orwell Estuaries SSSI , the LPA will need to prepare a Habitats Regulation Assessment will be required to assess the in-combination impacts from recreational disturbance on Stour & Orwell Estuaries SPA/Ramsar site.

The site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA/Ramsar site, so Natural England's revised interim advice to ensure new residential development and associated recreational disturbance mitigation for designated site impacts is compliant with the Habitats Regulations 2010 (as amended) applies.

Natural England's consultation response on this application (Ref 220526 letter from John Jackson, dated 3 August) has indicated that a Habitats Regulations Assessment (HRA) should be undertaken for this proposal. The HRA needs to assess potential impacts from the development (either alone or in combination with other land and projects) and formulate any necessary mitigation measures. This is "typically a combination of 'on-site' informal open space provision and promotion (i.e. in and around the development site) and 'off-site' visitor access management measures (i.e. at the Natura 2K site)". A proportionate financial contribution towards visitor management measures will need to be secured from the developer for the latter in line with the emerging Recreational disturbance Avoidance and Mitigation Strategy (RAMS) for residential development within the 13 km ZOI specified.

Please contact me with any queries.



Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

Place Services at Essex County Council

sue.hooton@essex.gov.uk

Place Services provide ecological 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.



24 January 2018

Rebecca Biggs
Babergh District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Rebecca,

Application: 1856/17

Location: Land Off Norwich Road Barham And Claydon

Proposal: Re-Advertisement Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 300 homes, including 7 self-build plots and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Thank you for consulting Place Services on the above application.

No objection subject to conditions to secure:

- a) **A proportionate financial contribution towards visitor management measures for the Stour & Orwell Estuaries SPA/Ramsar.**
- b) **Ecological mitigation and enhancements**

The site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA/Ramsar and Natural England's consultation response (Ref 217628) is that this development has the potential to affect these European sites afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations') and the Stour Estuary SSSI which is notified at a national level. To ensure this new residential development is compliant with the Habitats Regulations 2017, the LPA has been advised that a proportionate financial contribution should be sought from the developer. The LPA is currently preparing an HRA screening report to secure this contribution for this application which has been agreed with the applicant.

Ecological assessments have been provided by Base Ecology. This includes a Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017). These ecological reports include sufficient information to assess the impacts of development on designated sites, protected species and priority species/habitats.

Recommendations:

The mitigation and enhancement measures identified in the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt



addendum (December 2017) - should be secured and implemented in full. This is necessary to conserve and enhance protected and priority species. In summary, the following actions should be undertaken for the proposed development:

1. A submission of a copy of a European Protected Species Mitigation Licence for great crested newts should be provided from Natural England.
2. Precautionary mitigation for applicable habitats, reptile, birds, badger, hedgehogs have been provided within Preliminary Ecological Appraisal.
3. A skylark mitigation strategy should be undertaken to offset the loss of skylark nesting habitat.
4. Precautionary mitigation measures for bats should be undertaken to mitigate the possible impacts of lighting during construction. A Lighting Design Scheme should also be provided prior to occupation to protect bats from the effects of lighting after the construction phase.
5. A dense woody buffer using native species should be provided along the northern boundary to increase the overall availability of suitable habitat for refuge / shelter for brown hares within the zone of influence and reduce the level of disturbance impacts resulting from increased human usage.
6. A Landscape and Ecological Management Plan should be provided to determine the management and locations of ecological landscape features and proposed enhancements.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed are considered reasonable and will contribute to this aim.

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

CONDITIONS

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

“Any works to the terrestrial habitat identified within the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017), shall not 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 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)

II. CONCURRENT WITH RESERVED MATTERS: COMPLIANCE WITH RECOMMENDATIONS OF THE ECOLOGICAL REPORT



“All ecological mitigation and enhancement measures and/or works, shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.”

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)

III. CONCURRENT WITH RESERVED MATTERS: SKYLARK MITIGATION STRATEGY

“A Farmland Bird Mitigation Strategy shall be approved and implemented in full to mitigate the loss of the nesting habitat.”

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

IV. PRIOR TO OCCUPATION: 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 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)

V. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

“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)

Please contact me with any further queries.

Best wishes

Hamish Jackson BSc (Hons)

Junior Ecological Consultant

Place Services at Essex County Council

Hamish.Jackson@essex.gov.uk

Place Services provide ecological 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.



25th May 2018

Elizabeth Flood
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Elizabeth,

Thank you for requesting advice on this application from Place Services's 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: 1856/17

Location: Land Off Norwich Road Barham And Claydon

Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

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

No objection subject to securing:

- a) A proportionate financial contribution towards visitor management measures at the Stour & Orwell Estuaries SPA/Ramsar.**
- b) Ecological mitigation and enhancements**

Summary

I have reviewed the revised Illustrative Landscape Master Plan (BMD Ltd, April 2018), relating to reduction of dwellings and increase of green space and wildlife areas.

I have reviewed the ecological assessments provided by Base Ecology (Preliminary Ecological Appraisal, April 2017; Great Crested Newt Habitat Suitability Index Assessment, April 2017; and Great Crested Newt addendum, December 2017), relating to the likely impacts of development on Protected & Priority habitats and species.



I have also assessed the submitted Skylark Plot Mitigation Area, Drawing No 0068/304 (Pigeon Investment Management Ltd, December 2017) to indicate the location of compensation for the loss of suitable foraging/breeding habitat for Skylarks.

The ecological assessments provide certainty for the LPA of the likely impacts on Protected and Priority species and, with appropriate mitigation measures secured, the development can be made acceptable. Whilst the provision of skylark plots on neighbouring arable land is considered an appropriate compensation measure, the details for the number (2 per pair of skylark), specification to be created annually and length of time i.e. a period of ten years, will need to be secured by a condition of any consent.

The revised Illustrative Landscape Master Plan will provide significant contributions to biodiversity net gain due to the proposed wildlife friendly habitat creation. The increased number of hedgerows will provide more foraging and commuting routes for bats, as well as more roosting opportunities. The species rich meadows will provide opportunities for invertebrates and would also provide a suitable terrestrial habitat for reptiles or Great Crested Newts.

The retained agricultural land, bordered by hedgerows within this plan would keep suitable habitat for Brown Hares on site. However, if this area it is not possible to be kept as agricultural land due to archaeological issues, then it is highlighted that the enhanced hedgerow boundary to the north of the site will provide increased shelter opportunities for this species. Sufficient ecological enhancements are therefore already in place for hares within this application, but could be increased further by providing an open grassland habitat instead of the retained agricultural land. If required, alternative compensation for Brown Hares could be provided offsite prior to occupation.

The proposed enhanced hedgerow to the north of the site, facing towards agriculture land, will also provide sheltering opportunities for Turtle Doves. No records of this species have been identified within a 1km radius data search using the Suffolk Biodiversity Information Services (SBIS) records. Therefore, further action for enhancement measures for this species would not be appropriate or reasonable.

Any enhancement measures for Protected and Priority Species should be placed within a Biodiversity Enhancement Strategy. This should include reference to the above species, Great Crested Newts and Hedgehogs. Additional enhancement measures are also recommended for Stag Beetles and Swifts. This is because the SBIS records indicate that these Priority species are within 500 metres of the development. Any enhancements for these species are not considered a requirement of the development, but are considered reasonable to achieve Net Gain for biodiversity.

Any impacts to Badgers will be scoped out by providing a prior to commencement check for the species. This will further assess the likely impacts to badgers and provide mitigation measures, if required.

I am satisfied that there is sufficient ecological information available for determination. The above details will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.



Consequently, the mitigation and enhancement measures identified in the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017) - should be secured and implemented in full. As this is necessary to conserve and enhance protected and priority species

In addition, the LPA is currently preparing an HRA screening report which needs to confirm that an appropriate financial contribution has been secured for visitor management measures at the Stour & Orwell Estuaries SPA/Ramsar. The applicant will also have to demonstrate that a revised 2.6km daily recreational walking route is available for new residents to avoid impacts from the development alone. Both these are required to be embedded within this application for new residential development to be compliant under the Conservation of Habitats and Species Regulations 2017.

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 ANY RESERVED MATTERS: SUBMISSION OF A COPY OF THE EPS LICENCE FOR GREAT CRESTED NEWT

“Any works to the terrestrial habitat identified within the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017), shall not 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 and enhance 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 ANY RESERVED MATTERS: ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

“All ecological mitigation and enhancement measures and/or works, shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Base Ecology, April 2017), Great Crested Newt Habitat Suitability Index Assessment (Base Ecology, April 2017) and Great Crested Newt addendum (Base Ecology, December 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The



appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”

Reason: To conserve and enhance 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 ANY RESERVED MATTERS: FOLLOW UP BADGER SURVEY

“An additional badger survey shall take place immediately prior to commencement of works to assess the possible changes of badger activity, which may affect the proposed Development”

Reason: To conserve and enhance Protected species and allow the LPA to discharge its duties under the Badgers Act 1992 as amended and s17 Crime & Disorder Act 1998.

4. CONCURRENT WITH ANY RESERVED MATTERS: SKYLARK MITIGATION SCHEME

“A Skylark Mitigation Scheme shall be submitted to and approved in writing by the local planning authority to mitigate the loss of the nesting habitat.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.”

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

5. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY

“A Biodiversity Enhancement Strategy containing the details and locations of the compensation and enhancement measures shall be submitted to and approved in writing by the local planning authority.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.”

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended, s40 of the NERC Act 2006 (Priority habitats & species) and under paragraph 118 of the NPPF.

6. 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)

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 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 me with any queries.

Yours sincerely,

Hamish Jackson BSc (Hons) GradCIEEM
Junior Ecological Consultant
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.



09 December 2019

Jo Hobbs
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk 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: 1856/17
Location: Land Off Norwich Road Barham And Claydon
Proposal: Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Dear Jo,

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

Holding objection due to insufficient ecological information.

Summary

We have reviewed additional documents provided and have reassessed the ecological assessments provided by Base Ecology (Preliminary Ecological Appraisal, April 2017; Great Crested Newt Habitat Suitability Index Assessment, April 2017; and Great Crested Newt addendum, December 2017), relating to the likely impacts of development on Protected & Priority habitats and species.

The amended designs do not raise any further ecological considerations with this application, which have not already been addressed via the submitted ecological documents. However, we note that the ecological documents are now out of date for this application. Therefore, we are not satisfied that sufficient ecological information has been provided for determination of this scheme.

The out of date ecological assessments were provided 30 months ago. Therefore, an addendum to ecological assessments should be provided following the Chartered Institute of Ecology and Environmental Management (CIEEM) - Advice note on the Lifespan of Ecological Reports and Surveys (April 2019) - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>



Consequently, prior to determination, it is recommended that a professional ecologist will need to undertake a site visit and may also need to update desk study information for this application. The addendum to the ecological report should then provide appropriate justification on the validity of the report. In addition, the addendum must also consider whether further ecological mitigation will be required from this amended application.

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

We look forward to working with the LPA and the applicant to provide the additional information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

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

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

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



16 January 2020

Jo Hobbs
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk 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.

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Dear Jo,

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

No objection subject to:

- a) **securing visitor management measures towards the Stour and Orwell Estuaries Special Protection Area and Ramsar, in line with the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy; and**
- b) **ecological mitigation and enhancement measures.**

Summary:

We have reviewed additional documents provided and have reassessed the ecological assessments provided by Base Ecology (Preliminary Ecological Appraisal, April 2017; Great Crested Newt Habitat Suitability Index Assessment, April 2017; and Great Crested Newt addendum, December 2017), as well as the Ecology Verification 2019: Addendum to the Preliminary Ecological Appraisal, Pond Assessment and Mitigation Statement (Hopkins Ecology Ltd, January 2020), provided by the applicant, relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats.

We are satisfied that there is sufficient ecological information available for determination and recommend that Place Services initial advice, provided on the 10th December 2018 & 09 January



2019, should be followed. 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.

Therefore, the mitigation and enhancement measures identified in the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017) and Great Crested Newt addendum, December 2017), as well as the Ecology Verification 2019: Addendum to the Preliminary Ecological Appraisal, Pond Assessment and Mitigation Statement (January 2020), should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species. In addition, we also have the following comment:

Designated Sites - Habitats Regulations Assessment

As previously highlighted, the site contains residential development which is situated within the Zone of Influence (ZOI) for the Stour and Orwell Estuaries SPA & Ramsar. Therefore, Natural England's standard advice should be followed to avoid Adverse Impacts to Site Integrity to the above Habitats Sites (from the development alone and in combination of other plans and projects), to ensure compliance with the Habitats Regulations 2017.

We are satisfied that sufficient information has been provided to undertake the LPA's provision of a Habitats Regulations Assessment – Appropriate Assessment, considering the demonstration of the circular PROW map and the provision of high quality high-quality, informal, semi-natural areas. However, to finalise the provision of the Habitats Regulations Assessment, the applicant should also agree in principle that they are happy to provide the following, **prior to determination**:

- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long-term maintenance and management of these provisions
- A proportionate financial contribution towards visitor management measures will need to be secured from the developer in line with the Suffolk Coast Recreational Avoidance Disturbance Avoidance and Mitigation Strategy (RAMS) (£121.89 per dwelling) for delivery prior to occupation, secured by legal agreement.

Protected Species - Bats & Lighting

A wildlife friendly lighting scheme should be provided for this application as indicated within the Preliminary Ecological Appraisal, to be secured as a condition of any consent prior to occupation. This should follow [Guidance Note 8 Bats and artificial lighting](#) (The Institute of Lighting Professionals & Bat Conservation Trust, 2018), [Guidelines for consideration of bats in lighting projects](#) (Eurobats Secretariat, 2018). Therefore, it is highlighted that a professional ecologist should be consulted to advise the lighting strategy for this scheme. In addition, the following measures should be indicated to avoid impacts to foraging and commuting bats:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Environmentally Sensitive Zones should be established within the development, where lighting could potentially impact important foraging and commuting routes for bats.
- Warm White lights should be used preferably at 2700k – 3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high



attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.

- Light columns should be as short as possible as light at a low level reduces the ecological impact. However, if taller columns (>8m) are required, the use of cowls, hoods, reflector skirts or shields should be used to prevent horizontal spill.
- Lux levels and horizontal lighting should be directed away from boundary edges and Environmentally Sensitive Zones and kept as low as possible. This should preferably demonstrate that the boundary features and Environmentally Sensitive Zones are not exposed to lighting levels of approximately 1 lux. This is necessary to ensure that light sensitive bat species, will not be affected by the development.

Priority Species - Skylarks

We note the outlined location of offsite agricultural land within the applicant's control to provide compensation for the loss of Skylark Territories within the site. The mitigation strategy should either be informed by a Breeding Bird Survey or undertaken via a precautionary approach to offset the total possible Skylark territories on site. Two Skylark plots should then be provided for every Skylark territory lost, following the methodology for the Agri-Environment Scheme option: '[AB4 Skylark Plots](#)'. Therefore, the proposed three Skylark plots is not appropriate as it does not follow the Agri-Environment Scheme methodology. The Skylark plots should then be secured via a period of 10 years under a s.106 agreement or the proposed condition.

Soft Landscaping and measurable net gains for biodiversity

We approve of the proposed landscape design for this application and indicate that the landscaping management for this development should be secured via a Landscape and Ecological Management Plan, which should be secured as condition of any consent, concurrent with reserved matters.

We also support the proposed that the reasonable biodiversity enhancement measures should be secured via a separate Biodiversity Enhancement Strategy to also be secured at reserved matters stage. This is necessary to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019.

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

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.



Recommend Conditions:

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

“All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.”

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

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

“Any works to the terrestrial habitat identified within the Preliminary Ecological Appraisal (April 2017), Great Crested Newt Habitat Suitability Index Assessment (April 2017) and Great Crested Newt addendum (December 2017), shall not 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 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. PRIOR TO COMMENCEMENT: 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 the evidenced number of 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: 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.

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 organisation 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)

5. CONCURRENT WITH RESERVED MATTERS: 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) timetable for implementation demonstrating that works are aligned with the proposed phasing of development;*
- e) persons responsible for implementing the enhancement measures;*
- f) 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).

6. 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)
Ecological Consultant
Ecology.placeservices@essex.gov.uk

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

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



Planning Services
Mid Suffolk District Council,
131 High Street,
Needham Market,
Suffolk IP6 8DL

27/06/2017

For the attention of: Gemma Walker

Ref: 1856/17; Land off Norwich Road, Barham and Claydon,

Thank you for consulting us on the outline application for a residential development of up to 300 homes; this includes 8 self-build plots and affordable housing. A doctors surgery site, amenity space, extension to the Church grounds, Pre-School and Primary School site are also proposed along with associated infrastructure, access road and spine road.

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

Recommendations

In terms of the likely visual effect on the surrounding landscape, the proposal will inevitably have an impact on the existing rural character of Claydon. The main development constraint is the requirement to ensure (according to Policy GP1 of the Mid Suffolk Local Plan 1998 and First alteration 2006) the proposed development “maintains and enhances the character and appearance of the surrounding area”.

The following points highlight our key recommendations for the submitted proposals:

- 1) A landscape strategy needs to be produced which demonstrates how the proposal links with the surrounding residential and movement network, in order to create an appropriate public realm and provide suitable levels of amenity space. The submitted illustrative masterplan (Ref: Illustrative Landscape Masterplan) fails to show this to the adequate level of detail. The submitted landscape strategy should include the following sections:
 - a. Context and character
 - b. Landscape Design strategy
 - c. Landscape masterplan (Inc. visuals/perspectives)
 - d. Public open space
 - e. SUDs strategy
 - f. Boundary treatments (Inc. sections)
 - g. Hard landscaping Strategy
 - h. Tree Strategy
 - i. Planting Strategy

- 2) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is

in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics.

- 3) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved.
- 4) The residential edge to the east and south (fronting Norwich Rd and Church Lane) needs to relate to existing local character, this could be reinforced in the proposed Landscape Strategy.
- 5) Street trees should be proposed on the Illustrative Landscape Plan to imitate what was proposed in the LVIA and on the Proposed Site Layout Plan.
- 6) SUDs could be incorporated into the overall landscape design further by including rain gardens and/or swales. These could be proposed on movement routes or within amenity green spaces.

The proposal

The application plans set out the outline application for residential development of up to 300 homes; this includes 8 self-build plots and affordable housing. A doctors surgery site, amenity space, extension to the Church grounds, Pre-School and Primary School site are also proposed along with associated infrastructure, access road and spine road. All matters to be reserved with the exception of the access road and spine road.

The site lies to the north of the village of Claydon in Suffolk. The existing site is greenfield land currently used for agricultural purposes. The Site is rectilinear in shape and covers an area of approximately 24.17 hectares (ha).

The site currently comprises of two large arable fields bound to the north by further agricultural land with a hedgerow and scrub vegetation on the boundary. To the south lies Church Lane with residential development beyond, to the east a bridleway with St Mary's & St Peter's Church opposite the south-east corner and to the west Norwich Road which has open views onto some commercial development beyond

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape Visual Impact Assessment, Indicative Site Layout, Illustrative Landscape Plan and Planning, Design and Access Statement.

The Landscape Visual Impact Assessment has been produced to the appropriate guidance with appropriate viewpoints and wirelines shown. The report includes mitigation measures such as "extensive tree planting throughout the development (including street trees, trees in the rear gardens, within hedgerows and public open spaces)" which are all key measures which should be used to inform and influence any detailed design on site.

In contrast, the currently Planning, Design and Access statement does not provide enough details on landscape elements of the sites design. Therefore it would be suggested that a Landscape Strategy is provided, looking at all elements of the sites landscape and how the sites character and context is going to influence the material choices and landscape design.

Furthermore, the Illustrative Landscape Plan provides a great overview of the sites proposed landscape features. However there are some key concepts which aren't shown. For instance, the LVIA and Site Layout Plan (Ref: Site Layout 016 - 013 - 002) both propose that street trees will be used across the site. However these have not been shown on the illustrative plan. It would therefore be advised that this plan is updated to match the mitigation measures shown in other documents. Street trees are a key landscape feature that should be built in to all major development sites, especially on key primary routes.

Likely impact on the surrounding landscape

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of Rolling Estate Farmlands character type, which is described as "a valley side landscape of deep loams, with parklands, plantations and Ancient Woodlands". Key characteristics of the Rolling Estate Farmlands character type include; gently sloping valley sides and plateau fringes, generally deep loamy soils, organic pattern of fields modified by later realignment and coverts and plantations with

some ancient woodlands. Because of this there is an expectation that many of these landscape principles will be designed into the emerging development proposals.

The key sensitive edges are the southern and western boundaries along Norwich Rd and Church Lane, where the existing dwellings will overlook the proposed development. Elsewhere, views from surround field's public rights of way will also be affected.

Proposed mitigation

The illustrative landscape plan shows areas of water attenuation and green open space on both the western and southern edges of the proposed development. As part of these features, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting scheme. There are also opportunities to include swales and possible rain gardens which could contribute to the SUDs on site. These could be located along primary routes i.e. Spine Road and/or in open green spaces such as the proposed LAPs.

An appropriately detailed landscape and boundary plan with an accompanying planting schedule will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal.

Yours sincerely,

Ryan Mills BSc (Hons) LMLI
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.

From:Ryan Mills, Landscape Consultant
Sent:27 Jun 2018 13:23:36 +0100
To:BMSDC Planning Area Team Green
Cc:Gemma Pannell;Sue Hooton, Principal Consultant Ecologist
Subject:Land off Norwich Rd Barham & Claydon (DC/17/1856)
Attachments:2142 Land at Norwich Road, Barham and Claydon Landscape Statement 18 06pdf

Please see comments below made to Simon Butler-Finbow regarding application DC/17/1856 landscape recommendations.

Kind regards,

Ryan Mills LMLI BSc (Hons) MSc
Landscape Consultant at Place Services

telephone: 03330320591 | mobile: 07775008053

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/ryanhmills



From: Ryan Mills, Landscape Consultant
Sent: 19 June 2018 12:57
To: 'Gemma Pannell'
Subject: FW: Landscape Statement - Land off Norwich Rd Barham & Claydon (DC/17/1856)

Hi Gemma,

Not too sure who is taking this application on. But please see landscape comments below on Pigeons proposed landscape strategy.

Any questions, please let me know.

Ryan Mills LMLI BSc (Hons) MSc
Landscape Consultant at Place Services

telephone: 03330320591 | mobile: 07775008053

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/ryanhmills



From: Ryan Mills, Landscape Consultant

Sent: 08 June 2018 10:22

To: 'Simon Butler-Finbow'

Cc: Hamish Jackson, Junior Ecological Consultant; Landscape

Subject: RE: Landscape Statement - Land off Norwich Rd Barham & Claydon (DC/17/1856)

Hi Simon,

It all looks great. My only criticism would be the picture of the Attractive woodland edge planting
(Page 11). The tree guards are quite extreme can rabbit fencing be used to prevent access to the
area, rather than individual tree guards?

Also, in terms of the separation between the Church and the development I think more emphasis on
this element of the scheme needs to be detailed in the descriptive text i.e. The Tree Strategy explain
how further tree planting on the eastern boundary will help mitigate views of the development from the
church.

Also, have the LVIA viewpoints/visuals been amended to coincide with the new layout? I would think the visual impact of the development may have improved slightly with further separation now in place.

Kind regards,

Ryan Mills LMLI BSc (Hons) MSc
Landscape Consultant at Place Services

telephone: 03330320591 | mobile: 07775008053

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/ryanhmills



From: Simon Butler-Finbow [mailto:S.Butler-Finbow@pigeon.co.uk]
Sent: 05 June 2018 14:40
To: Hamish Jackson, Junior Ecological Consultant; Ryan Mills, Landscape Consultant
Subject: Landscape Statement - Land off Norwich Rd Barham & Claydon (DC/17/1856)
Importance: High

Dear Ryan and Hamish,

Further to recent meetings please see the attached DRAFT for your consideration (covering both landscaping and ecology matters).

If can you let me have your comments so these can be incorporated into a formal submission that would be appreciated.

If I can help in the meantime please do not hesitate to contact me.

Thank you in anticipation of your help with this matter.

Kind regards,

Simon

PS - Please note the document is intended for printing at A3.

Simon Butler-Finbow



Pigeon Investment Management Ltd
Linden Square
146 Kings Road
Bury St Edmunds
Suffolk IP33 3DJ

Tel: 01284 766 200

Direct Dial: 01284 771019

Mobile: 07881 315165

Email: s.butler-finbow@pigeon.co.uk

Website: www.pigeon.co.uk

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Planning Services
Mid Suffolk District Council,
131 High Street,
Needham Market,
Suffolk IP6 8DL

10/01/2019

For the attention of: Jo Hobbs

Ref: 1856/17; Land off Norwich Road, Barham and Claydon,

Thank you for re-consulting us on the outline application (with all matters reserved except for access and spine road) for phased development for the erection of up to 270 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).

Review on the submitted information

Relevant to this landscape review, the submitted application now includes a Landscape Visual Impact Assessment, Illustrative Landscape Plan, Planning, Design and Access Statement, Indicative visualisations and a Landscape Statement

The Landscape Visual Impact Assessment has been produced to the appropriate guidance with appropriate viewpoints and wirelines shown. The report includes mitigation measures such as "extensive tree planting throughout the development (including street trees, trees in the rear gardens, within hedgerows and public open spaces)" which are all key measures that should be used to inform and influence any detailed design on site.

The Landscape Statement demonstrates how the proposal has been influenced by the landscape context and local character and vernacular. It is deemed acceptable as long as the landscape principles are carried forward as part of any future reserved matters application.

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

1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING

Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other construction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

3. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting.

4. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan

If you have any queries relating to any of the matters raised above please let me know.

Yours sincerely,

Ryan Mills BSc (Hons) MSc CMLI
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 Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

06/12/2019

For the attention of: Jo Hobbs

Ref: 1856/17; Land North West of, Church Lane, Barham, Suffolk

Thank you for consulting us on the Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description). This letter sets out our consultation response in regards to additional documentation submitted (12/11/2019).

In regards to landscape matters, the submitted School Plan (Drwg title: School scheme) shows the indicative layout for a future school, along with proposed open space and sports facilities. Although this is welcomed, we would expect the boundary between the proposed residential plots and the school site to be enhanced with additional soft landscape features such as a hedge and associated tree planting to help reduce noise impact.

Other than this, our landscape condition recommendations dated 10/01/2019 still stand. These are as follows:

- 1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING**
Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other construction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.
- 2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.**
No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.
- 3. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.**
No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping

plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting.

4. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS**

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

If you have any queries regarding the above matters please do not hesitate to contact me.

Regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior 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.

From:David Harrold
Sent:7 Jun 2017 13:19:45 +0100
To:X Delete Aug 17 - Planning Admin
Cc:Gemma Walker
Subject:Plan ref 1856/17 Land of Norwich Road Barham and Claydon.

Thank you for consulting me on the outline application for the erection of 300 homes etc.

In principle, I do not have any objection to the development with respect to any other environmental health issue.

I note, however, the propose layout has dwellings along Norwich Road which will be approximately 250 metres from the A14 dual carriage way. Facades of these premises may be affected by high levels of road transport noise and I would recommend a condition attached to any approval that a noise survey is carried out to assess this impact with reference to British Standard 8233 for internal noise levels and World Health Organisation Standards for external noise levels during the day and night time periods. Such a survey will identify the need for any noise mitigation measures by way of site layout and design, noise barriers and façade treatments.

Reason: To avoid any significant adverse impacts from road transport noise on the future occupiers and habitation of the proposed dwellings.

David Harrold MCIEH

Senior Environmental Health Officer

Babergh and Mid Suffolk Council

From: Iain Farquharson
Sent: 07 June 2017 16:13
To: BMSDC Planning Area Team Green
Subject: M3194503: Planning Consultation Request - 1856/17

Dear Sir/Madam

We have reviewed the documents submitted thus far in relation to this application.

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

The extent of the proposals is large with the potential for significant energy demand (300 dwellings, doctors surgery and community building). Accordingly some forethought as to energy consumption, energy conservation and sustainable construction is expected.

The application does not provide sufficient information to address council policy CS3 Reduce Contributions to Climate Change or Core Strategy SO8, therefore we recommend refusal until information on this topic is made available for consideration.

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

BB01449 724878
00iain.farquharson@baberghmidsuffolk.gov.uk

Planning Application – Consultation Response

Planning Application Reference:	1856/17
Site:	Land North West Of Church Lane Barham
Proposal:	Outline planning application (with all matters reserved except for access and spine road) for phased development for the erection of up to 269 dwellings and affordable housing, together with associated access and spine road including works to Church Lane, doctor's surgery site, amenity space including an extension to the Church grounds, reserved site for Pre-School and Primary School and all other works and infrastructure (amended description).
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	15/01/2020

1. Policy position

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA002.

2. 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, policy reference LA002. 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 Barham & Claydon:

Existing Permissions

- 0928/17 Land At Norwich Road, Barham – Full permission for 10 dwellings
- 0191/17 Land Rear Of De Saumarez Drive, Barham – Full permission for 23 dwellings
- 0085/17 Land Between Norwich Road And Pesthouse Lane, Barham – Outline permission for 20 dwellings
- 1832/17 Land To The West Of Old Norwich Road And To The East Of The A14 Claydon – Outline permission for 190 dwellings. Emerging Joint Local Plan allocation reference LA102, for 190 dwellings.

Planning applications awaiting determination (other than this application)

- DC/18/00861 Land To The East Of, Ely Road, Claydon – Outline application for 73 dwellings. Emerging Joint Local Plan allocation reference LA003, for 75 dwellings.

Other emerging Joint Local Plan site allocations

- LA001 - Land to the east of Norwich Road, Barham – 325 dwellings

There are several essential infrastructure needs for Barham & Claydon that are identified:

- Education
The IDP states that within Barham & Claydon a new pre school setting for 60 places is needed with proposed land allocation on LA002. A new primary school is also to be provided, also on site LA002, to supply growth of Claydon & Barham. We understand that the needs for a new early years setting and new primary school are addressed within the proposed scheme. 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 Claydon High School from 818 to 900 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 Barham & Claydon, contributions towards the new footway links and bus stops would be required as well as highway mitigation measures. Specific site details and required contributions are provided through the County Council Highway response.
- Health
The local practice is the Barham & Claydon Surgery, where the IDP refers increased capacity for this locality being required as a result of committed and Joint Local Plan growth. Therefore, developer contributions via the Community Infrastructure Levy (CIL) may be required to meet the cost of additional health provision arising.

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.

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA002.

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 mitigation measures/contributions towards highways, health and open space.

The scheme is therefore supported by the Strategic Planning Team.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: ^

FROM: ^Officer Name, Environmental Protection Team DATE: ^

YOUR REF: 1856/17. EH - Land Contamination.

SUBJECT: Outline planning application for phased development for the erection of up to 300 homes, including 8 self-build plots and affordable housing, together with ...

Address: Land Off Norwich Road, Barham & Claydon.

Please find below my comments regarding contaminated land matters only.

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

No development shall take place until:

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.

It is important that the following advisory comments are included in any notes accompanying the Decision Notice:

“There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.

The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.

The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team.”

Nathan Pittam
Senior Environmental Management Officer

From:David Pizzev
Sent:22 Jun 2017 11:58:20 +0100
To:Gemma Walker
Cc:BMSDC Planning Area Team Green
Subject:1856/17 Land Off Norwich Road, Barham And Claydon.

Hi Gemma

I have no objection in principle to this application subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report. Whilst a small number of trees and sections of hedgerow are proposed for removal these are generally of limited amenity value and/or poor condition and their loss will have negligible impact on the character of the local area. If you are minded to recommend approval we will also require a detailed Arboricultural Method Statement, Tree Protection Plan and monitoring schedule in order to help ensure the protective measures referred to are implemented effectively. This information can be dealt with under condition.

Please let me know if you require any further input.

Regards

David

David Pizzev
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzev@babergmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

Please find attached planning consultation request letter relating to planning application - 1856/17 - Land Off Norwich Road, Barham And Claydon, ,

Kind Regards

Planning Support Team

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Consultation Response Pro forma

1	Application Number	1856/17 Land off Norwich Road, Barham and Claydon	
2	Date of Response	04 August 2017	
3	Responding Officer	Name:	Tegan Chenery
		Job Title:	Heritage Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • Less than substantial harm to designated heritage assets because the extent of proposed development within the setting of listed buildings in the vicinity of the site would erode the rural location and open landscape which contributes to the significance of the assets. 2. The Heritage Team recommends that expanse and layout is a key consideration in the appropriateness of the proposed development and will be fundamental in mitigating and reducing the level of harm; difficult to ascertain through an application for outline approval. 	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>This proposal is for Outline approval for the erection of up to 300 dwellings with associated access, spine road, additional church parking, as well as sites for doctor's surgery and school; with all matters reserved except for access and spine road.</p> <p>The Heritage implications here are the potential effects of the proposed housing development on designated heritage assets in the vicinity of the site, including the GI listed Church of St Mary and St Peter, GII* Shrubland Hall with its GI registered landscape, GII listed Henry VIII Farmhouse and GII listed garden wall and gateway at Barham Hall. Development within the setting of designated heritage assets can cause harm to significance (NPPF 132) and this is the main consideration in regard to assessment of this outline application.</p> <p>The Heritage team considers that the proposal will cause less than substantial harm to designated heritage assets due to encroachment within the setting which diminishes the rural landscape and river valley, which contribute to significance, as well as visual impact within the setting of a registered landscape.</p> <p>The submitted Heritage Statement accompanying the application is helpful in ascertaining the designated</p>	

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

		<p>heritage assets involved, their individual significance and heritage interest, as well as the potential impact of the development in each case. The Heritage team accords with the conclusion that there will be little harm to the special interest of the listed wall and gateway at Barham Hall as the proposal site contributes little to its significance, whilst considered to be within the setting. Henry VIII Farmhouse will have some impact due to the cumulative impact of modern development surrounding the farmstead arrangement, further diminishing its setting and relationship to the open countryside, but would not be detrimental to its already greatly altered immediate setting. Key consideration is to be given to the GI listed church to the east of the site, as well as Shrubland Hall and its registered landscape to the north.</p> <p>The Heritage team accords with the views of Historic England (dated 11/07/2017) in the broad sense. An indicative masterplan of the proposed residential development provides little detail or concrete proposals in order to mitigate or establish the levels of harm. In particular with this case, the site layout and proximity to designated assets will be imperative in reducing the level of harm and making a balanced judgement, weighed against public benefit (NPPF 134).</p> <p>Whilst the immediate setting of Shrubland Hall could be defined as limited to its registered park with a sense of looking in on itself, providing a private and enclosed landscape; the wider surrounding landscape provides an additional contribution in the Hall's narrative as a country house, relating to its wider rural location. Its elevated position further links the Hall with the surrounding landscape and there will inevitably be a level of harm through the alteration of a largely rural vista – particularly evident from the tower at Shrubland Hall, illustrated with the wireline at Viewpoint 1 – with increased urbanisation; expanding the modern housing already in existence to the south of the proposal site.</p> <p>In a similar vein as Historic England's assessment of the harm to the GI Church of St Peter and St Mary, the Heritage team accord with the view that the current open landscape to the west of the church positively contributes to the setting of the church and encroachment of built development on the majority of this area in the rural landscape would be detrimental to the appreciation and narrative of the church. Its elevated position overlooking the Gipping valley heightens its role as a landmark feature and the encroachment of modern development to its western perimeter would diminish its isolated position</p>
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		<p>away from the village and above the river valley. Mitigation to reduce the level of harm is fundamental in regard to the proximity of development and nature of boundary treatment and natural landscape buffering, by utilising the existing topographical features where the land drops away to the west. In this particular case, the proposed green buffer to the eastern periphery of the site would not provide sufficient softening and distinction between the proposed development site and the church; the development could be drawn back further to make use of undulations in the site and utilise the topography and landscape as a natural mitigation measure, alleviating harm to views and setting of the asset. Outline proposals omit these finer details of buffering and landscaping treatment by their nature with the submission of only an indicative site plan and as such does not establish a definitive layout which can mitigate harm to significance due to development within the setting of designated heritage assets.</p> <p>To conclude, the Heritage team considers this outline scheme would cause less than substantial harm to designated heritage assets due to the cursory detail provided with only an indicative proposal. Historic England's comments on the application are reflected in the teams assessment and would consider that the extent of the proposed housing development would diminish the current rural character of the open landscape and agricultural fields which positively contribute to the setting of GI Church of St Peter and St Mary, as well as the wider setting and lengthy vistas in the context surrounding Shrubland Hall and the registered parkland. Harm to designated heritage assets should be weighed against public benefits of the proposal.</p> <p>Decision-takers should be mindful of the specific legal duties of the local planning authority with respect to the special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses, as set out in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure</p>	

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	any requests are proportionate	
7	Recommended conditions	

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

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Gemma Walker – Senior Planning officer
From: Julie Abbey-Taylor, Professional Lead – Housing Enabling
Date: 28/07/2017

SUBJECT: - **Application Reference: M/1856/17/OUT**

Proposal: Application for erection of up to 300 dwellings including 8 self-build plots and affordable housing on land off Norwich Road, Barham

Key Points

1. Background Information

A development proposal for three hundred (300) residential dwellings
This is an open market development and proposes 105 affordable housing units which = 35%.

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. A new SHMA is currently being written but outcomes are not available at the time of this consultation.

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

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

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%
4+	2%

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

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.900 applicants registered for affordable housing in Mid Suffolk at April 2017.

2.7 The Council's Choice Based Lettings system currently has 12 applicants registered for affordable housing, who are seeking accommodation in Barham as at 2016. This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **890** applicants registered is the important number.

3. Preferred Mix for Open Market homes (195). The open market mix should provide a mix of 2, 3 and 4 bed dwellings for market sale with the emphasis on 2 and 3 bed dwellings and should include housing suitable for older people such as bungalows/chalet bungalows and Lifetime Homes standard homes across the site.

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:
 - 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.
 - 25% of households think their current property will not be suitable for their needs in 10 years' time.

- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

4. Preferred mix for Affordable Housing (105).

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 20 applicants registered who have a connection to Barham. However as this is a planning obligation site it is the district wide figure of 890 is the relevant housing need figure to be applied.

4.2 105 of the proposed dwellings on the development will be for affordable housing. These have been offered the form of: -

Rented (65 dwellings = 62%): -

8 x 1 bed 2-person flats @ 50 sqm in 2 blocks of 4 flats
 4 x 2 bed 4-person flats @ 70 sqm
 4 x 2 bed 3-person bungalows @ 63 sqm
 2 x 2 bed 4-person bungalows @ 70 sqm
 33 x 2 bed 4-person houses @ 79 sqm
 12 x 3 bed 5-person houses @ 93 sqm
 2 x 3 bed 6-person houses @ 102 sqm

Shared Ownership (25 dwellings = 24%): -

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

Shared Equity or Starter Homes (15 dwellings = 14%):-

10 x 2 bed 4-person houses @ 79 sqm
 5 x 3 bed 5-person houses @ 93 sqm

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

5. Other requirements for affordable homes:

- Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units on first lets and 75% on subsequent lets.

- The affordable units will be built out in phases across the development to be agreed at Reserved Matters stage if the outline application is approved.
- Shared Ownership units have a maximum initial share purchase threshold of 70%
- Any shared equity units must be offered at a maximum share of 80% and the remaining equity transferred free of charge to Mid Suffolk District Council.
- Affordable housing units must be transferred freehold to an approved RP.
- Where there are more than 15 affordable units, they should not be located in clusters of more than 15 units.
- **Adequate parking provision is made for the affordable housing units**

Julie Abbey-Taylor, Professional Lead – Housing Enabling

Consultation Response Pro forma

1	Application Number	M/1856/17/OUT	
2	Date of Response	31.7.2017	
3	Responding Officer	Name:	Julie Abbey-Taylor
		Job Title:	Professional Lead – Housing Enabling
		Responding on behalf of...	Strategic Housing service of...
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<p>The development proposes erection of up to 300 new dwellings.</p> <p>Recommendation – inclusion of 105 affordable homes as detailed below in 5.</p>	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Up to 35% affordable housing should be provided as part of this application which equates to 105 dwellings.</p> <p><u>Rented (65 dwellings = 62%): -</u></p> <p>8 x 1 bed 2-person flats @ 50 sqm in 2 blocks of 4 flats 4 x 2 bed 4-person flats @ 70 sqm 4 x 2 bed 3-person bungalows @ 63 sqm 2 x 2 bed 4-person bungalows @ 70 sqm 33 x 2 bed 4-person houses @ 79 sqm 12 x 3 bed 5-person houses @ 93 sqm 2 x 3 bed 6-person houses @ 102 sqm</p> <p><u>Shared Ownership (25 dwellings = 24%): -</u></p> <p>2 x 2 bed 4-person bungalows @70sqm 15 x 2 bed 4-person houses @ 79 sqm 8 x 3 bed 5-person @ 93 sqm</p> <p><u>Shared Equity or Starter Homes (15 dwellings = 14%):-</u></p> <p>10 x 2 bed 4-person houses @ 79 sqm 5 x 3 bed 5-person houses @ 93 sqm</p>	

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

		The above mix is requested to meet housing needs and to be included in the S106 agreement.
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	Unit types and sizes to be detailed in the S106 agreement if permission is granted.
7	Recommended conditions	The affordable housing mix as above to be included in the S106 agreement in the event the application is approved by Committee.

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MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Gemma Walker – Senior Planning officer
From: Julie Abbey-Taylor, Professional Lead – Housing Enabling
Date: 28/07/2017

SUBJECT: - **Application Reference: M/1856/17/OUT**

Proposal: Application for erection of up to 300 dwellings including 8 self-build plots and affordable housing on land off Norwich Road, Barham

Key Points

1. Background Information

A development proposal for three hundred (300) residential dwellings
This is an open market development and proposes 105 affordable housing units which = 35%.

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. A new SHMA is currently being written but outcomes are not available at the time of this consultation.

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

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

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%
4+	2%

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

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.900 applicants registered for affordable housing in Mid Suffolk at April 2017.

2.7 The Council's Choice Based Lettings system currently has 12 applicants registered for affordable housing, who are seeking accommodation in Barham as at 2016. This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **890** applicants registered is the important number.

3. Preferred Mix for Open Market homes (195). The open market mix should provide a mix of 2, 3 and 4 bed dwellings for market sale with the emphasis on 2 and 3 bed dwellings and should include housing suitable for older people such as bungalows/chalet bungalows and Lifetime Homes standard homes across the site.

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:
 - 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.
 - 25% of households think their current property will not be suitable for their needs in 10 years' time.

- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

4. Preferred mix for Affordable Housing (105).

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 20 applicants registered who have a connection to Barham. However as this is a planning obligation site it is the district wide figure of 890 is the relevant housing need figure to be applied.

4.2 105 of the proposed dwellings on the development will be for affordable housing. These have been offered the form of: -

Rented (65 dwellings = 62%): -

8 x 1 bed 2-person flats @ 50 sqm in 2 blocks of 4 flats
 4 x 2 bed 4-person flats @ 70 sqm
 4 x 2 bed 3-person bungalows @ 63 sqm
 2 x 2 bed 4-person bungalows @ 70 sqm
 33 x 2 bed 4-person houses @ 79 sqm
 12 x 3 bed 5-person houses @ 93 sqm
 2 x 3 bed 6-person houses @ 102 sqm

Shared Ownership (25 dwellings = 24%): -

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

Shared Equity or Starter Homes (15 dwellings = 14%):-

10 x 2 bed 4-person houses @ 79 sqm
 5 x 3 bed 5-person houses @ 93 sqm

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

5. Other requirements for affordable homes:

- Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units on first lets and 75% on subsequent lets.

- The affordable units will be built out in phases across the development to be agreed at Reserved Matters stage if the outline application is approved.
- Shared Ownership units have a maximum initial share purchase threshold of 70%
- Any shared equity units must be offered at a maximum share of 80% and the remaining equity transferred free of charge to Mid Suffolk District Council.
- Affordable housing units must be transferred freehold to an approved RP.
- Where there are more than 15 affordable units, they should not be located in clusters of more than 15 units.
- **Adequate parking provision is made for the affordable housing units**

Julie Abbey-Taylor, Professional Lead – Housing Enabling

Consultation Response Pro forma

1	Application Number	M/1856/17/OUT	
2	Date of Response	07/02/2018	
3	Responding Officer	Name:	Julie Abbey-Taylor
		Job Title:	Professional Lead – Housing Enabling
		Responding on behalf of...	Strategic Housing service of...
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<p>The development proposes erection of up to 300 new dwellings.</p> <p>Recommendation – inclusion of 106 affordable homes as detailed below in 5.</p>	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Up to 35% affordable housing should be provided as part of this application which equates to 106 dwellings.</p> <p><u>Rented (66 dwellings = 62%): -</u></p> <p>8 x 1 bed 2-person flats @ 50 sqm in 2 blocks of 4 flats 4 x 2 bed 4-person flats @ 70 sqm 4 x 2 bed 3-person bungalows @ 63 sqm 2 x 2 bed 4-person bungalows @ 70 sqm 34 x 2 bed 4-person houses @ 79 sqm 12 x 3 bed 5-person houses @ 93 sqm 2 x 3 bed 6-person houses @ 102 sqm</p> <p><u>Shared Ownership (25 dwellings = 24%): -</u></p> <p>2 x 2 bed 4-person bungalows @70sqm 15 x 2 bed 4-person houses @ 79 sqm 8 x 3 bed 5-person @ 93 sqm</p> <p><u>Shared Equity or Starter Homes (15 dwellings = 14%):-</u></p> <p>10 x 2 bed 4-person houses @ 79 sqm 5 x 3 bed 5-person houses @ 93 sqm</p>	

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

		<p>The above mix is requested to meet housing needs and to be included in the S106 agreement.</p> <p>In regards to the change in the number of self-build plots from 8 to 7, I have no objection.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<p>Unit types and sizes to be detailed in the S106 agreement if permission is granted.</p> <p>The plan number 016-013-004 shows the locations of the affordable housing. In terms of being pepper-potted around the development they are in 5 locations across the site which is good to see. However, we do normally seek no more than 15 dwellings in any one cluster and some of the clusters count for 21, 26 and 37 affordable homes respectively. I would seek for the larger clusters to be reduced down, particularly the cluster with 37 dwellings in the north-west quadrant of the site.</p> <p>I would also seek clarification on the type of units the following plot numbers are: - 75, 76, 83 and 258 – developer to advise what they are.</p>
7	Recommended conditions	The affordable housing mix as above to be included in the S106 agreement in the event the application is approved by Committee.

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

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jo Hobbs – Senior Planning Officer

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

Date: 24/01/2019

SUBJECT: - **Application Reference: M/1856/17/OUT**

Proposal: Application for erection of up to 270 dwellings including 8 self-build plots and affordable housing on land off Norwich Road, Barham. Revised layout and supporting information Dec 2019.

Key Points

1. Background Information

A development proposal for up to two hundred and seventy (270) residential dwellings, which is a reduction of 30 dwellings based on the previous proposal.
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This is an open market development and proposes 94 affordable housing units which = 35%.

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. A new SHMA is currently being written but outcomes are not available at the time of this consultation.

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

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

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

3	16%
4+	2%

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

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

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

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

2.7 This site is a S106 planning obligation application so the affordable housing provided will be to meet district wide need hence the **730** applicants registered is the important number.

3. Preferred Mix for Open Market homes (176). The open market mix should provide a mix of 2, 3 and 4 bed dwellings for market sale with the **emphasis on 2 and 3 bed dwellings and should include housing suitable for older people such as bungalows/chalet bungalows and Lifetime Homes standard homes across the site.**

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:
 - 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.
 - 25% of households think their current property will not be suitable for their needs in 10 years' time.

- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

4. Preferred mix for Affordable Housing (94 dwellings).

4.1 As this is a planning obligation site it is the district wide figure of 730 is the relevant housing need figure to be applied.

4.2 94 of the proposed dwellings on the development will be for affordable housing. These are required in the form of: -

Rented (67 dwellings = 71%): -

8 x 1 bed 2-person flats @ 50 sqm in 2 blocks of 4 flats
 4 x 2 bed 4-person flats @ 70 sqm
 4 x 2 bed 3-person bungalows @ 63 sqm
 2 x 2 bed 4-person bungalows @ 70 sqm
 33 x 2 bed 4-person houses @ 79 sqm
 14 x 3 bed 5-person houses @ 93 sqm
 2 x 3 bed 6-person houses @ 102 sqm

Shared Ownership (27 dwellings = 29%): -

2 x 2 bed 4-person bungalows @70sqm
 15 x 2 bed 4-person houses @ 79 sqm
 10 x 3 bed 5-person @ 93 sqm

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

5. Other requirements for affordable homes:

- Properties must be built to current Homes England requirements and NDSS 2015 and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units on first lets and 75% on subsequent lets.
- The affordable units will be built out in phases across the development to be agreed at Reserved Matters stage if the outline application is approved. The indicative plan showing the location of the affordable homes is seen as acceptable with dwellings distributed across the site.

- Shared Ownership units have a maximum initial share purchase threshold of 70%
- Affordable housing units must be transferred freehold to an approved RP or to the district Council.
- Where there are more than 15 affordable units, they should not be located in clusters of more than 15 units.
- **Adequate parking provision is made for the affordable housing units**

Julie Abbey-Taylor, Professional Lead – Strategic Housing