

Kenton Parish Meeting
Planning consultee response - Application number DC/19/04553

Kenton held a Parish Meeting on the Tuesday 22nd October at 7.00pm in All Saints Church, Kenton to discuss; -

Application for Outline Planning Permission - DC/19/04553 Anchor Storage, Eye Road, Kenton, Stowmarket Suffolk IP14 6JJ. Proposal: Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 32No dwellings (existing buildings to be demolished).

The decision of the meeting was to approve the application DC/19/04553 (some matters reserved – access to be considered).

Although approving the application, the parish meeting has concerns which they seek be considered by the Mid Suffolk Planning committee and where required constraints and/or planning conditions applied.

Mid Suffolk and Babergh District Councils Local Plan (MS&BDCLP).

The applicant refers to the MS&BDCLP in its Design Access Including Planning Statement (DAIPS) document, item 37 states;

The application site was identified as a possible housing allocation in the SHELAA and was supported by the Parish Council.

This statement is as per the initial version of the new joint local plan. The current version of the MS&BDCLP and associated SHELAA which has been published and was out for public comment. In this latest iteration of the MS&BDCLP has excluded this parcel of land at Anchor Storage (SS0401) for development with the following statement; -

“Draft SHELAA 2019 (page 557) states;

Kenton, (Mid Suffolk) SS0401 - Land east of Eye Road, Kenton - Adjoining land uses would be incompatible with the proposed residential development with no scope for mitigation.”

The parish seeks that the planning committee be briefed on the relative information which resulted in the comments on the SHELAA to this exclusion and take this into account in any decision made.

Infrastructure

The DAIPS item 25 also contains a statement on the decision of the Kenton Parish Meeting when the initial MS&BDCLP: -

“The local Parish meeting also voted in favour of the redevelopment of the site”

In the initial iteration of the MS&BDCLP the parish meetings decision with reference to SHELAA SS0401 was to agree to this possible development. We seek that the planning committee takes the following into account from submission made by Kenton Parish Meeting on the local plan; -

“The parish also seeks that any development in the village of Kenton is beneficial to the Parish of Kenton and that an uplift of infrastructure occurs i.e. roads feeding the village uplifted to accommodate increase traffic flow, passing places built on single track roads, footpaths be installed, children’s Playground built and equipped, etc.”

It is noted that the applicant has identified as per DAIPS item 59 that the village does not have a village hall and has offered; -

The offices of Anchor Storage are formed by a range of temporary structures. As part of the proposal the applicant is happy to offer the office building to the village to relocate it for use as a meeting room.

This offer is appreciated and the community needs to work to assess its viability.

Kenton does now have SuperFast Broadband which covers the majority of properties in the village. Mobile coverage from the various operators remains for many parts of the village poor. Residents raised issues that to work from or run businesses from home requires both SuperFast Broadband and mobile services to enable this.

The parish seeks that these issues be considered by the planning committee and where agreed conditions included in the decision outcome to improve the infrastructure of the village.

Traffic

The DAIPS, item 31 states; -

“Kenton does have a daily bus service to Stowmarket”

The residents of Kenton are NOT aware of such a service existing or having ever existed.

DAIPS, item 26 includes the statement on traffic movements; -

The average number of vehicular movements to and from the site is 28 HGV movements, 20 vans/light goods and 20 cars.

The meeting accepted that HGV movement to and from the site would decrease. Some of this decrease though of HGV's is negated by vehicles servicing increasing capacity to new business in the area i.e. Cranswick on Eye Airfield in the various stages of it processing for food production. Overall traffic will rise the meeting concluded.

The total movement cited from the existing site of 68 vehicles will be surpassed it is believed by the demands driven by the development.

Based on the local knowledge of residents of Kenton the majority of household have 2 or more vehicles. No service is offered by SCC for primary school children's transport from Kenton.

The proposed new development of 32 houses would drive the need for 2+ vehicles per household. and householder deliveries which will surpass total traffic movement of the site.

Also, the DAIPS, item 31 states; -

“Kenton does have a daily bus service to Stowmarket”

None of the residents of Kenton are aware of such a service existing or having ever existed.

This issue further drives resident use of their own vehicles and impacts on increase traffic volumes.

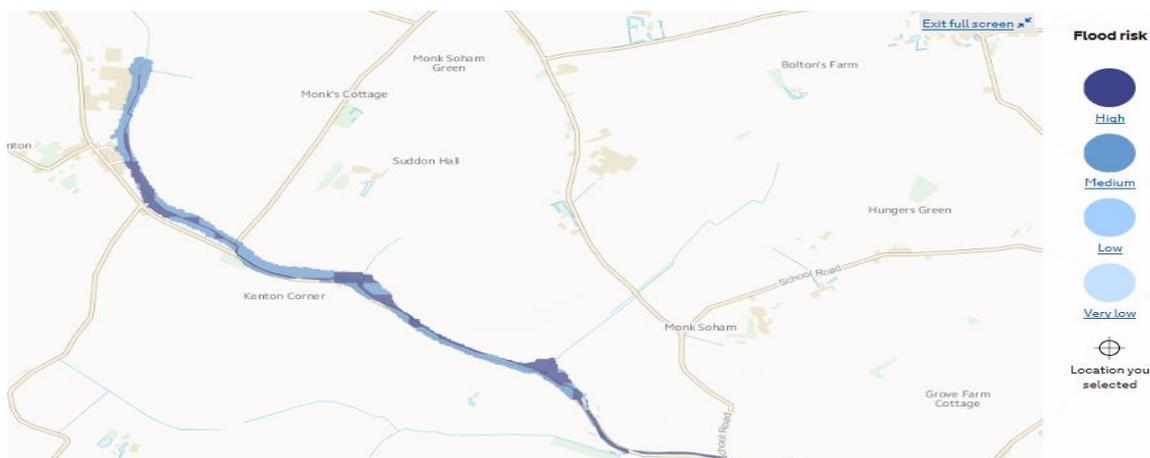
The parish seeks that these issues be considered by the planning committee and where agreed conditions included in the decision outcome to improve the infrastructure of the village.

Flood Risk & Drainage

The DAIPS, item 8 includes the statement: -

As this is an outline planning application with all matters reserved except for means of access, the surface water strategy for the site is a matter which can be controlled by a planning condition.

From the document Flood Risk Assessment and Drainage (FRA&D) mapping shows the site to be of a low risk. However, when the village of Kenton is viewed the area of Church Close and Shepherds Croft are classified as high risk areas (<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>) as are further areas downstream at Kenton Corner and beyond.



The concerns of residents are aligned to the applicants in that these risks needs to be controlled by a planning condition.

Foul water

Also considered is Foul water from the following statement from the FRA&D: -

"The public sewer to the north serves a small number of dwellings, which discharge to a tank. The effluent is regularly tankered away. It is therefore unsuitable for this scale of development."

This refers to a foul treatment plant which covers Garneys Close, Kenton. This treatment works is not classed as a mains sewer system. Any attempt by the developer to connect to this system will require discussions with MSDC Housing and the private residents of Garneys Close due to the potential changes to current charges levied.

The concerns reinforce the acceptance by the applicant and it is sought that no connection to this foul water system can be made and is supported by a planning condition.

Affordable and low-cost housing

The DAIPS item 28 includes the statement on generating homes for the local community: -

"the proposal will provide affordable and low-cost housing which will benefit the local community by providing new homes for young people in Kenton and adjoining villages."

The residents of Kenton seek that the Planning committee applies constraints and/or planning conditions to ensure the offer of affordable and low-cost housing is made available to local people only.

Accessibility to services

The DAIPS, item 30 includes the statement: -

"Kenton is a short distance from Debenham which benefits from a wide range of local services and facilities for day to day living,"

This we concur with. However, taking the day to day experiences of the residents of Kenton navigating the streets of Debenham as with many locations locally at peak periods and then successfully parking are increasingly taking longer to achieve. Infrastructure improvements have failed to keep pace with the increased traffic generated from the housing development built to date. Consideration needs to be given to the ability of local facilities i.e. roads, parking spaces, primary and secondary schools, surgeries etc to name a few are sufficiently expanded to cope from the multiple developments in the locality which have increased the pressures on these services and are impacting on the locality's residents.

The residents of Kenton seek that the Planning committee applies constraints and/or planning conditions to ensure these issues are addressed.

Conclusion

The parish of Kenton remains positive to this application. However, the benefits of it and to the wider community are difficult to measure in the positive. There are no facilities in Kenton, no pub, no shop, no post office, virtually road side footpaths etc. This is to the knowledge of the residents no plan to change this.

Facilities local to the residents of Kenton are in general in Debenham, shops, schools, doctors (but a problem with churn of doctors), sheltered housing, leisure centre, fire station, pub, post office, etc. Daily interactions and impacts on the residents occur due to the infrastructure and services not keeping pace i.e. retention of doctors at the surgery impacting on appointment waiting times. The demands being driven are not being allied to previous and proposed housing developments in the locality which are failing to meet the rising demands on the infrastructure and services. The search for a parking space is becoming an everyday experience to blight residents' lives.

The Parish of Kenton seeks these be addressed and that the benefits aspired to become an actual reality and not just words on a page. Please respect our local view and reasoning with the application of constraints and planning conditions sought to mitigate these concerns.

Chris Goldsmith
Kenton Parish Meeting Chairman
29th October 2019

Daniel Cameron
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2019/124564/01-L01
Your ref: DC/19/04553
Date: 30 October 2019

Dear Mr Cameron,

OUTLINE PLANNING APPLICATION (SOME MATTERS RESERVED - ACCESS TO BE CONSIDERED) - ERECTION OF UP TO 32NO DWELLINGS (EXISTING BUILDINGS TO BE DEMOLISHED). ANCHOR STORAGE EYE ROAD KENTON STOWMARKET SUFFOLK IP14 6JJ

Thank you for consulting us on the above application on 10 November 2019. We have reviewed the documents as submitted and can confirm that we are raising a holding objection on foul drainage grounds. Details on how to overcome our objection can be found below. We have also included details relating to flood risk below.

Foul Drainage

We have reviewed the documents submitted and the application proposed the use of a package treatment plant for foul drainage. The applicant has not supplied adequate information to demonstrate that the risks of pollution posed to surface water quality can be safely managed is a package treatment plant is used. No assessment of the risks of pollution to the surface water environment has been provided by the applicant or details of site drainage.

Also no confirmation of responsibility of the package treatment plant has been provided by the applicant on completion of the development. Until we receive sufficient basis for an assessment to be made of the risks of pollution to ground and surface water, along with confirmation that Anglian Water or another DEFRA approved organisation will be adopting the package treatment plant, we must continue to recommend a holding objection.

We ask to be re-consulted once the applicant has provided assessments that cover the above. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

Flood Risk

The applicant has sequentially sited all proposed development within Flood Zone 1.

Our maps show the site boundary lies within fluvial Flood Zone 3a/2 defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high/medium probability of flooding. The proposal is for Outline Planning Application for 32No dwellings (existing buildings to be demolished) which is classified as a 'more vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification](#) of the Planning Practice Guidance.

We are satisfied that the flood risk assessment, undertaken by G.H. Bullard and Associates referenced 010/2018/FADDS and dated Sept 19, provides you with the information necessary to make an informed decision.

J Flow

The Flood Zone maps in this area are formed of national generalised modelling, which was used in 2004 to create fluvial floodplain maps on a national scale. This modelling was improved more recently, using a more detailed terrain model for the area. This modelling is not a detailed local assessment, it is used to give an indication of areas at risk from flooding.

JFLOW outputs are not suitable for detailed decision making. Normally, in these circumstances, an FRA will need to undertake a modelling exercise in order to derive flood levels and extents, both with and without allowances for climate change, for the watercourse, in order to inform the design for the site.

However, as the applicant has sequentially sited their proposed development to be wholly within Flood Zone 1, we feel it is unnecessary to request the applicant to further model the ordinary watercourse with regards to the safety of the proposed development because the development should remain dry and provide refuge throughout the 0.1% (1 in 1000) annual probability event.

FEH Catchment Analysis and Flood Risk

The applicant has undertaken an FEH catchment analysis to determine if there is capacity within the channel of the watercourse to take the flows produced by the 1% (1 in 100) year rainfall event plus allowance for climate change or, whether it would overflow onto the floodplain.

The details of this can be found in Appendix I. There are no details of the flood levels in m AOD associated with these flows but based on this catchment and channel assessment, the site is not expected to flood, and hence the site is not considered to be located within Flood Zone 3. There is therefore a safe, dry means of access/ egress on the site during the 1% (1 in 100) cc event, as the water will be contained within the channel.

The 0.1% (1 in 1000) year event has not been assessed. However, given that the properties are 2 story, there will be refuge available above this associated flood level.

If you feel you do not have sufficient information with regards to flood levels on the access/egress routes, we advise that 1D modelling should be undertaken to accurately establish the risk to the access/egress routes in terms of potential depths and locations of flooding. The watercourse should be modelled in a range of return period events, including the 1 in 20 (5%), 1 in 100 (1%) and 1 in 1000 (0.1%) year events, both with and without the addition of climate change. Please remember to request the new climate change allowances. The flood levels on the access/egress routes should be

determined and compared to a topographic site survey to determine the flood depths and extents along the access/egress routes. This should be used to establish a route of safe access.

Modelling

Flood risk modelling undertaken by a third party has been used in support of this application and the we have applied a risk based approach to the assessment of this model. In this instance a basic review has been carried out.

We have not undertaken a full assessment of the fitness for purpose of the modelling and can accept no liability for any errors or inadequacies in the model.

We trust the above is useful.

Yours sincerely,

Miss Natalie Kermath
Planning Advisor

Direct dial 02077141064

Direct e-mail natalie.kermath@environment-agency.gov.uk

cc Philip Cobbold Planning Consultancy



Historic England

Mr Daniel Cameron
Babergh Mid Suffolk
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582740

Our ref: **W:** P01114412

8 October 2019

Dear Mr Cameron

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

**ANCHOR STORAGE, EYE ROAD, KENTON, STOWMARKET, SUFFOLK, IP14 6JJ
Application No. DC/19/04553**

Thank you for your letter of 7 October 2019 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

Sophie Cattier
Assistant Business Manager
E-mail: sophie.cattier@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 15 October 2019 16:07
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: Planning consultation DC/19/04553 NE Response

Dear Mr Cameron,

Application ref: DC/19/04553
Our ref: 297017

Natural England has no comments to make on this application.

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

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

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

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

Yours sincerely,
Heather Ivinson

Heather Ivinson
Operations Delivery
Consultations Team
Natural England
Hornbeam House, Electra Way
Crewe, Cheshire, CW1 6GJ
Tel: 0300 060 0475

www.gov.uk/natural-england

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

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

BMSDC Planning Mailbox

Subject: FW: Re: DC/19/04553 Anchor Storage Eye Road Kenton Stowmarket

From: Lisa De Pasquale <Lisa.DePasquale@suffolk.gov.uk>
Sent: 10 October 2019 12:27
To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: Re: DC/19/04553 Anchor Storage Eye Road Kenton Stowmarket

Good afternoon,

Thank you for consulting us on this proposal. In my opinion there would be no significant impact on known archaeological sites or areas with archaeological potential. I have no objection to the development and do not believe any archaeological mitigation is required.

Many thanks,

Lisa

Lisamaria De Pasquale

Assistant Archaeological Officer (Technical Support)
Suffolk County Council Archaeological Service
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk IP32 7AY
Tel.: 01284 741230
Email: lisa.depasquale@suffolk.gov.uk

Website: <http://www.suffolk.gov.uk/archaeology>
Search the Suffolk HER online at: <http://heritage.suffolk.gov.uk>
Follow us on Twitter at: <https://twitter.com/SCCArchaeology>

Your ref: DC/19/04553
 Our ref: Kenton – Anchor Storage, Eye Road
 59974
 Date: 10 October 2019
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

Mr Daniel Cameron,
 Growth & Sustainable Planning,
 Babergh and Mid Suffolk District Councils,
 Endeavour House,
 8 Russell Road,
 Ipswich,
 Suffolk,
 IP1 2BX

Dear Daniel,

Kenton: Anchor Storage, Eye Road – developer contributions

I refer to the proposal: outline planning application (some matters reserved – access to be considered) – erection of up to 32 No. dwellings (existing buildings to be demolished).

Summary of infrastructure requirements:

CIL	Education	
	- sixth form expansion	£22,738
CIL	Libraries	£6,912
S106	Education	
	- Secondary school transport	£28,800
S106	Highways	tbc
S106	Monitoring fee for each trigger point	£500

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

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

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

- a) Necessary to make the development acceptable in planning terms;

- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

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

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

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

The emerging Joint Local Plan contains policy proposals that will form an important tool for the day to day determination of planning application in both districts. Infrastructure is one of the key planning issues and the Infrastructure chapter states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and charges CIL on planning permissions granted after 11 April 2016.

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

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

- 1. Education.** Paragraph 94 of the NPPF states: ‘It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:
 - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

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

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

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

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

The most recent scorecard is 2018 and the national average school expansion build cost per pupil for primary schools is £16,596. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national expansion build cost (£16,596 x 1.00) produces a total of £16,596 per pupil for permanent expansion of primary schools.

The most recent scorecard is 2018 and the national average school expansion build cost per pupil for secondary schools is £22,738. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national expansion build cost (£22,738 x 1.00) produces a total of £22,738 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, "further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place".

SCC anticipates the following **minimum** pupil yields from a development of 32 dwellings, namely:

- a) Primary school age range, 5-11: 8 pupils. Cost per place is £16,596 (2019/20 costs).

- b) Secondary school age range, 11-16: 6 pupils. Cost per place is £22,738 (2019/20 costs).
- c) Secondary school age range, 16+: 1 pupil. Costs per place is £22,738 (2019/20 costs).

The local schools are Sir Robert Hitcham's CEVA Primary School (catchment school) Bedfield CEVC Primary School (nearest school), Debenham High School (catchment school and nearest but over 3 miles away from the proposed development), and Hartismere School (sixth form).

Based on existing school forecasts, SCC will have surplus places available at the primary and secondary schools, but no surplus places at the sixth form level. On this basis, at the sixth form level a future CIL funding bid of at least £22,738 (2019/20 costs) will be made.

If the Council considers that planning permission should be granted for the proposed development, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the site-specific costs of secondary school transport. Contribution required is as follows:

- a) **School transport contribution** – 6 secondary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Annual school transport cost per pupil is £960. Therefore, contribution is £960 x 6 pupils x 5 years = £28,800, increased by the RPI. Contribution to be secured for a minimum period of 10 years from completion of the development.

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

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

The recently published guidance from the Department for Education on Delivering schools to support housing growth states in paragraph 16: "Developer contributions

for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”.

From these development proposals SCC would anticipate up to 3 FTE pre-school child arising (FTE is equivalent to 30 hours per week). However, there are existing surplus places in the Worlingworth ward.

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

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

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

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

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £6,912, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

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

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

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

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

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

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

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

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

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

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

9. Ecology, landscape & heritage. These are matters for the Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals. Refer to the MHCLG guidance on the Natural environment [updated 21 July 2019].

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

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

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

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

13. Monitoring fee. The new CIL Regs allow for the charging of monitoring fees. In this respect the county council charges £500 for each trigger point in a planning obligation.

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

Apart from the s106 contribution, the above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

Yours sincerely,

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

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

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

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

Your Ref:
Our Ref: FS/F200783
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 15/10/2019

Dear Sirs

Anchor Storage, Eye Road, Kenton, Stowmarket IP14 6JJ
Planning Application No: DC/19/04553
Hydrants are required for this development
(see our required conditions)

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Sprinklers Advised

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

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

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter
Flood Risk Letter

Copy: info@philcobboldplanning.co.uk
Enc: Sprinkler information

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:

Planning Ref:

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS:
DESCRIPTION:
HYDRANTS REQUIRED**

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

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

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

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

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

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/

OFFICIAL

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

OFFICIAL

Created: September 2015

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



Dear Sir/Madam

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

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

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

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

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

Dispelling the Myths of Automatic Fire Sprinklers

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

Promoting the Benefits of Automatic Fire Sprinklers

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

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

The Next Step

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

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

Suffolk Fire and Rescue Service

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

Residential Sprinkler Association

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

British Automatic Fire Sprinkler Association

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

Fire Protection Association

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

Business Sprinkler Alliance

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

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

Yours faithfully

Mark Hardingham

Chief Fire Officer

Suffolk Fire and Rescue Service



SUFFOLK FIRE AND RESCUE SERVICE (SFRS) GENERIC ADVICE FOR PROPOSED DEVELOPMENTS IN FLOOD ZONES

When a developer proposes development in flood zones 2 and 3 (as determined by the local Strategic Flood Risk Assessment and the developer's Flood Risk Assessment (FRA) supports invacuation of occupants in the event of flooding, the FRA needs to suitably detail the provision of a flood emergency kit for however long occupants would be expected to remain invacuated. This kit should include information warning of the dangers of using portable heaters and candles etc during potential utility failures.

If access roads to the development may be inundated the following advice should be considered by planners and developers:

1. Standard modern Fire and Rescue Service (FRS) vehicle design and crew safety considerations has resulted in SFRS fire appliances being unable to operate in or drive through water any deeper than 20cm.
2. In any event where working in water is required the Crew/Incident Commander must carry out a dynamic risk assessment to confirm the situational risk vs benefit before adopting tactics involving working in water.
3. Whilst every effort will always be made by SFRS to respond to fires and rescues, due to the nature and scale of significant flood events a dynamic risk assessment may determine that FRS resources are unable to respond normally along flooded routes where the depth of flood water at any point is greater than 20cm. This may prevent or delay emergency response. Strategic and tactical risk assessments and resource limitations may also cause response times to vary significantly from normal operating procedures.
4. One consideration compounding the water safety issues for emergency responders would be the fact that fire hydrants in the area may also be rendered unserviceable due to inundation.
5. It is noted that the issues of potentially flooded access routes may be an existing situation for existing properties in the flood zone areas(s) being developed. Notwithstanding this, any new development proposals should actively consider the provision of a suitable and appropriately installed fire sprinkler system(s) (designed to be resilient and operate in flood conditions) in order to:
 - a. Significantly enhance occupant safety by mitigating effects of any fire occurring during flood events which may result in occupant invacuation and restrict the normal capabilities of the Fire and Rescue Service response.

Continued/

Generic guidance for proposed developments in flood zones
Suffolk Fire and Rescue Service

- b. (This would actually have the beneficial effect of enhancing the fire safety of building occupants at all times);
- c. Significantly limit fire damage and environmental impact of any fire in the new property; and
- d. Reduce additional burden of risk for emergency responders attempting to use best efforts responding to the new property for life critical incidents.

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 14 October 2019 07:58
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: Daniel Cameron <Daniel.Cameron@baberghmidsuffolk.gov.uk>
Subject: 2019-10-14 JS Reply Anchor Storage, Eye Road, Kenton, Suffolk IP14 6JJ Ref DC/19/04553

Dear Daniel Cameron,

Subject: Anchor Storage, Eye Road, Kenton, Suffolk IP14 6JJ Ref DC/19/04553

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/04553.

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

- Location Plan (No Reference)
- Flood Risk Assessment and Drainage Strategy ref 010/2018/FRADS P1

The reason why we are recommending a holding objection is because whilst the applicant has evaluated the existing flood risk to the site, there is insufficient detail within the surface water drainage strategy.

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

1. Applicant needs to demonstrate that they can accommodate a full open SuDs system rather than a hybrid
 - If a hybrid SuDs system is to be proposed, the a viability statement is to be provided
2. Applicant needs to demonstrate that there is sufficient space for a basin that meets the LLFA design criteria
3. Applicant to provide a CDM Designer risk assessment for the basin design

Kind Regards

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

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

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



24 October 2019

Daniel Cameron
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

By email only

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

Application: DC/19/04553
Location: Anchor Storage Eye Road Kenton Stowmarket Suffolk IP14 6JJ
Proposal: Outline Planning Application (some matters reserved - access to be considered) -
Erection of up to 32No dwellings (existing buildings to be demolished).

Dear Daniel,

Thank you for consulting Place Services on the above application.

No objection subject to securing biodiversity mitigation and enhancement measures

Summary

We have reviewed the Extended Phase 1 Survey Report (Hillier Ecology Limited, September 2018) relating to the likely impacts of development on designated sites, protected species and Priority species & habitats.

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

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

The mitigation measures identified in the Extended Phase 1 Survey Report (Hillier Ecology Limited, September 2018) should be secured and implemented in full. This is necessary to conserve and enhance protected and Priority Species.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of



the National Planning Policy Framework 2019. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured prior to slab level.

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.

Recommended 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 Extended Phase 1 Survey Report (Hillier Ecology Limited, September 2018) 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, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. 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) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

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

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



3. CONCURRENT WITH RESERVED MATTERS: 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 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.

From: BMSDC Economic Development <BMSDCEconomicDevelopment@babberghmidsuffolk.gov.uk>

Sent: 17 October 2019 15:20

To: Daniel Cameron <Daniel.Cameron@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

Subject: DC/19/04553 | Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 32No dwellings (existing buildings to be demolished). | Anchor Storage Eye Road Kenton Stowmarket Suffolk IP14 6JJ

Dear Dan

RE: DC/19/04553 | Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 32No dwellings (existing buildings to be demolished). | Anchor Storage Eye Road Kenton Stowmarket Suffolk IP14 6JJ

Summary

Thank you for consulting the Open For Business Team. The OFB Team OBJECTS to the proposed development as it would undermine the aims and objectives of the Council's Open For Business Strategy 2018.

Support for employment development

In the March 2018 draft NPPF changes^[1], chapter 6 'Building a strong, competitive economy' is clear when it sets out "*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*". the NPPF continues to support rural growth, development, diversification and well-designed new buildings.

The Council's Open For Business Strategy 2018 sets out the aims and objectives of the Council towards economic prosperity. The Council seeks to:

c) Help to deliver 10,000 new jobs* and nearly 18,000 new homes by 2036**

d) Deliver a range sites of different types, sizes and locations of employment land and premises to meet both identified business sectoral needs as well as general employment sites.

g) Raise the quality of local jobs, the value of our businesses, increase average wages, and support gender pay equality

h) Support local businesses to survive, thrive and grow and in doing so recognise that our local economic bedrock is micro and SME businesses/enterprises and these support, and build identity, within our local communities

"To enable the delivery of the above, we will

g) Support the creation of additional commercial floorspace and premises"

The Strategy commits the Council to

e) ... Our Economic Development Strategy offers another layer which supports this growth and provides opportunities for change. Our aim is to link people to jobs, not trying to steer business, industry and markets, but respond to and champion their needs and help them to grow. The Councils,

[1]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf

and in particular our planning and our built environment related services can facilitate and enable sustainable growth rather than seek simply to control it without consideration of the bigger picture.

f) Foster a culture of encouraging proposals for economic development, with applications being assessed on their detail in the context of the Local Plan. Where that detail needs careful scrutiny, we'll keep that culture in the forefront of our consideration if we need to find solutions that aren't on the table."

General need for premises.

The Council's main evidence is established in the Lichfields *Ipswich Economic Area (IEA) Sector Needs Assessment 2017*. (<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Ipswich-Economic-Area-Sector-Needs-Assessment-Sept-2017.pdf>)

This identifies a need for 9.1 hectares of B1a/b Office space and 0.3ha of B1/B2/B8 industrial space. It is assumed that 70% of new floorspace would be in lower density, business park developments with a plot ratio of 0.4, with 30% in higher density town centre locations at a plot ratio of 2.0. This reflects the existing pattern of office development in these areas which are characterised by limited town centre office markets and a greater prevalence of edge/out of town business parks. The study does not envisage the loss of existing premises.

Employment conditions in rural Mid Suffolk

The majority (>98%) of businesses in Mid Suffolk are Micro businesses (between 0 – 9 employees), and Small and Medium Enterprises (SME) (10 – 49 employees). Only 0.2% or 10 businesses operating their registered address within the district can be counted as large businesses with over 250 employees. The needs of each scale of business are very different, but have traditionally been addressed as a single need.

In the rural Mid Suffolk District, farm conversions such as the subject site offering small scale, low cost premises– both in response to the lack of supply on recognised sites, and the need for premises throughout the Districts rather than just focused on the main towns. These sites are under an ever-increasing threat from redevelopment of sites into other uses – specifically residential use. While it can be appropriate in some circumstances to reuse vacant, redundant, brownfield land, there have also been cases of functioning and viable employment land and premises being lost.

The OFB Team objects to the loss of employment land and premises across the District, as the current low supply of suitable premises is stifling growth and productivity. Indeed, with low churn rates, high rental values and very low vacancy in employment locations, the loss of further premises, particularly in rural areas where need is at its highest, cannot be accepted without at the very least alternative provision to accommodate existing occupiers.

Where buildings are vacant due to condition, the OFB Team considers that redevelopment with new employment buildings is sequentially preferable to complete loss to another use. Loss of employment and building of more houses does not lead to the development of sustainable communities, as more homes and fewer local job opportunities leads to additional out-commuting and pressure on local services.

Policy

Chapter 6 of the NPPF sets out that planning for a prosperous rural economy supports objective A of the NPPF overall: "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure"

Local Plan Policies E4, E5 and E6 specifically support this stance as the thrust of the policies is to protect legitimate employment uses. Circumstances may exist where loss is appropriate, but no evidence has been submitted to support the same. There is no evidence to support the suggestion that the current site is “non-conforming” under E7. Even where existing uses/users/premises are considered inappropriate, then the land remains an employment location and the preference is for alternative employment uses rather than outright loss.

Conclusion

The Economic Development Team cannot support the proposal and recommends that planning permission is REFUSED.

With best regards

Andrew McMillan

Economic Development Officer – Open For Business

Babergh and Mid Suffolk District Councils - Working Together

0300 1234 000 - switchboard

01449 72 4931 - desk

07860 829 428 – mobile

Email: Andrew.McMillan@baberghmidsuffolk.gov.uk

Websites: www.babergh.gov.uk www.midsuffolk.gov.uk

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

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From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 10 October 2019 10:29
To: Daniel Cameron <Daniel.Cameron@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/19/04553. Land Contamination

Dear Daniel

EP Reference : 267067
DC/19/04553. Land Contamination
Anchor Storage, Eye Road, Kenton, STOWMARKET, Suffolk, IP14 6JJ.
Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 32No dwellings (existing buildings to be demolished).

Many thanks for your request for comments in relation to the above application. I note that the applicant has submitted a Phase I report by Nott Group – I would note that the report does not cover the entire development site. Could we request that the applicant submits a Phase I report that covers the whole of the site before we provide our consultation response. Without a report covering the whole site I would be forced to recommend that the application be refused on the grounds of insufficient information.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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

Consultation Response Pro forma

1	Application Number	DC/19/04553 Anchor Storage, Eye Road, Kenton	
2	Date of Response	28/10/19	
3	Responding Officer	Name:	Karolien Yperman
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
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.	<p>Based on the limited amount of information included with this outline application, the Heritage Team considers that the proposal has the potential to cause</p> <ul style="list-style-type: none"> A low to medium level of less than substantial harm to a designated heritage asset because there would be some harm in introducing residential development on this site. The full impact of the proposed residential development would depend on the layout, scale, design, boundary treatment and use of materials of the proposed dwellings. 	
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 is an outline planning application for the erection of up to 32 dwellings next to the Grade II listed Sycamore Farmhouse, following the demolition of existing warehouses. Only access is considered, although an indicative layout has been submitted. The heritage concern relates to the impact of the principle of residential development on this site (following demolition of the existing buildings) on the setting of the listed building, which contributes to its significance.</p> <p>Sycamore Farmhouse is located to the north of the historic core of Kenton. Historic OS maps show a scattering of farmhouses with outbuildings spread out along this part of the road, which were gradually connected by modern development throughout the C20. The 1884 and 1904 maps show Sycamore Farmhouse with a close grouping of outbuildings to the south and two ponds and possibly an orchard to the north, separating the farmhouse from Sycamore Cottage. By 1978, the smaller outbuildings to the south of the farmhouse were replaced with large structures, surrounding the farmhouse from the north-east to the south, leaving only the area immediately to the north of the listed building undeveloped. The physical form and character of these warehouses compromise the setting of the listed building and its connection to the surrounding landscape to the east.</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 introduction of up to 32 dwellings on this site would be contrary to the existing linear pattern of development on this part of Eye Road and would change the character of this land. However, the existing structures and their character currently detract from the setting of Sycamore Farmhouse, therefore their demolition would be positive. Smaller scale dwellings may be less harmful to the setting of the listed building than the existing buildings.</p> <p>There would likely be some harm associated with the introduction of a residential development on this site. However, this harm would be limited by the extent that the setting of the listed building has already been compromised. The full extent of the impact on the setting of the listed building would depend on the layout, scale, design, boundary treatment and use of materials of the proposed development. Based on the information submitted at this stage, the resulting level of harm would likely be a low to medium level of less than substantial harm, which should be weighed up against public benefits as per para. 196 of the NPPF.</p> <p>To minimise the level of harm, the layout of the development as shown on the indicative drawing could be improved. For example, maintaining the undeveloped area to the front of the site as open space would better preserve the immediate setting of Sycamore Farmhouse and its position in the streetscape.</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><i>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.</i></p>
7	<p>Recommended conditions</p>	

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

Planning Application – Consultation Response

Planning Application Reference:	DC/19/04553
Site:	Anchor Storage Eye Road Kenton Stowmarket Suffolk IP14 6JJ
Proposal:	Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 32No dwellings (existing buildings to be demolished).
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	11/11/2019

1. Policy position

The relevant Development Plan policies to consider are:

- the National Planning Policy Framework (2019)
- the saved policies of the Mid Suffolk District Local Plan (1998)
- the First Alteration to the Mid Suffolk Local Plan (2006)
- the Mid Suffolk District Core Strategy Development Plan Document (2008)
- the Mid Suffolk District Core Strategy Focused Review (2012)

Kenton is currently identified as a village in the countryside in the adopted MSDC Core Strategy (<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Mid-Suffolk-Core-Strategy/Core-Strategy-with-CSFR-label-and-insert-sheet-07-01-13.pdf>), policy CS1 (page 24-25), where: *development will be restricted to particular types of development to support the rural economy, meet affordable housing, community needs and provide renewable energy*, as stated in the policy.

Kenton is progressing through the emerging Joint Local Plan as a Hamlet, where only small-scale infill growth would be considered appropriate. The proposed development is for 32 units which is a large application in a settlement where only small-scale growth should be considered to be in accordance with current and emerging planning policy.

The proposed development is also considered contrary to policy, in respect to saved Policies GP1 and H7 of the Mid Suffolk Local Plan (1998), Policies CS2 and CS5 of the Mid Suffolk Core Strategy (2008) and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focussed Review (2012) which seek to direct development to settlements with a greater range of services and facilities, to control development in the countryside and maintain and enhance the environment, amongst other considerations.

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 dependant on changing infrastructure capacity, requirements and priorities.

The proposed development is not part of the proposed site allocations of the emerging Joint Local Plan. 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.

Over the last five years, only minor development has taken place within the settlement, with no current pending or approved planning applications for over 10 dwellings, other than potentially this outline application, subject to the determination of the above application. There are no proposed site allocations for Kenton in the emerging Joint Local Plan, and therefore there are no specific infrastructure needs set out for Kenton in the IDP.

This proposed development is not therefore part of the planned growth and the infrastructure required to support it are assessed through the planning application consultation process.

As referred above, Kenton is a village in the countryside, where there are no key services or facilities. Whilst it is generally accepted that small scale growth can generally be supported through existing infrastructure and rural housing is encouraged in village where it will support local services (NPPF, Paragraph 77-79). In this case, the local services are only available in Debenham (nearest to the development site) and will primarily be accessed by car. Access, including the means of access, to infrastructure, services and facilities is a key consideration in determining the sustainability of the proposal. In this regard there is considered to be limited and unsustainable access to services and facilities. The nearest facilities are located in Debenham, approximately 2.5 miles away from the site to the centre of Debenham (a Parish which has a made Neighbourhood Plan with proposed allocations).

Infrastructure considerations are:

- Education

There is no primary school within the settlement. The catchment primary school is Sir Robert Hitcham's CEVAP, in Debenham, and the nearest school is Bedford CEVC Primary School. Sir Robert Hitcham is planned to expand in the IDP, Bedford CEVC Primary School is not planned to expand in the IDP in relation to the planned growth of the Joint Local Plan, however, as stated by the County Council in their response of the 10 October 2019, these schools are able to provide for the proposed growth.

The catchment secondary school is Debenham High School, which is not planned to expand in relation to the emerging JLP growth and can provide for this development.

For Post 16 education, Hartismere School (sixth form) in Eye, is the nearest, and is due to expand.

It is important to note that although education provision can be made, the pupils deriving from this development will primarily be driven or bused to their primary and secondary schools, as it is already the case for the existing pupils within Kenton, this additional unplanned growth would therefore create unnecessary adverse harm in respect of social and environmental conditions, and is contradictory to the paragraphs 103, 104a) and 108a) of the NPPF.

- Transport

Specific site details and required contributions would be provided through the County Council Highway response.

In relation to public transport, there are no regular bus services to and from Kenton, this further limits the opportunities for using sustainable modes of travel from this proposed development. Although Kenton is within 3 miles of the centre of Debenham, the two settlements are linked by country lanes, where no continuous footways exist to enable safe walking. It is therefore realistic to assume that most trip to access infrastructure and services generated from the

development will be made by car, in contradiction with the objectives of the NPPF, paragraph 79.

Within the settlement itself there are poor footpath provision and although the development could provide additional connections to existing footpaths, there are no services and facilities available within the settlement.

- Health

The nearest health centre is the Debenham practice, where the IDP states that mitigation will be sought for cumulative growth in the vicinity of this practice, however the growth proposed from this site would increase capacity on an already over capacity surgery and therefore impacting on the provision made for the planned growth of the Joint Local Plan and the Neighbourhood Plan, and committed growth within Debenham.

3. Summary

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

Overall the application is a major development proposal in a small rural settlement with very limited accessibility to essential services and facilities. The impact of this proposal would be significantly different to that of small scale/ infill growth.

From an education infrastructure point of view, the pupils deriving from this development will primarily be driven or bused to their primary and secondary schools. Although this is already the case for the existing pupils within Kenton, this additional, unplanned growth would create unnecessary adverse harm in respect of social and environmental conditions, and as such this proposal weighs against paragraphs 103, 104a) and 108a) of the NPPF. Adding to the fact that there are no other key services and facilities in Kenton, and no access to regular public transport, it is therefore realistic to assume that most trip to access infrastructure and services generated from the development will be made by car, in contradiction with the objectives of the NPPF, paragraph 79.

In consideration of the above the proposed development is not considered to conform to national and local planning policy and due to its remoteness/ poor accessibility is considered unsustainable and consequently harmful in accordance with para 79 and 103 of the NPPF.

It is not considered a suitable location for a major housing scheme, having regard to access to services and facilities, the Strategic Planning Team therefore cannot support the proposal and recommends that planning permission is refused.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 09 October 2019 16:36

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/19/04553

Hello Planning Support

Public Realm note the inclusion of open space to the rear of this development though details are at this stage, sparse. It would be anticipated that the future management and maintenance of this open space would be undertaken locally as it is only of significant value to those properties constructed as part of this development. Further comments can be made at a later stage should permission for this development be given. Public Realm have no objections to the development as indicated on the plans.

Regards

Dave Hughes

Countryside and Public Realm

Babergh & Mid Suffolk District Councils – Working Together

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MID SUFFOLK DISTRICT COUNCIL

TO: Daniel Cameron – Senior Planning Officer

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

Date: 30.10.2019 2019

SUBJECT: DC/19/04553

Proposal: Outline application (some matters reserved- access to be considered)

Erection of up to 32 dwellings (existing dwellings to be demolished)

Location: Anchor Storage, Eye Road, Kenton, Stowmarket, IP14 6JJ

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information

- A development of 32 dwellings was been submitted on this site that has been used as a Self-Storage facility. The planning statement advises that these units are still in use and employ around 18 people.

2. Housing Need Information:

2.1 The Babergh and Mid Suffolk District Strategic Housing Market Assessment confirms a continuing need for housing across all tenures and a growing need for affordable housing. The most recent update of the Strategic Housing Market Assessment completed in February 2019 confirms **a minimum need of 127 affordable homes per annum.**

2.2 The Council's Choice Based Lettings system currently has circa. 700 applicants registered for the Mid Suffolk area as of July 2019. This scheme would be required to help meet with district wide housing need. However, in consideration of the location of this site and its proximity to amenities and infrastructure, I do not consider that this is a suitable location for affordable housing units. In discussion with our Allocations team, we are in agreement that any tenants of the rented units would be dependent upon car travel for pretty much everything in terms of getting children to school or travelling to work.

2.3 With regard to the open market housing on the site it is noted that the current proposal is to provide a range of dwelling types and sizes. Our 2014 Housing Needs Survey shows that there is a need across all tenures for smaller units of accommodation, which includes accommodation suitable for older people, wishing to downsize from larger privately-owned family housing, into smaller privately-owned apartments, bungalows and houses.

2.4 It would also be appropriate for any open market apartments and smaller houses on the site to be designed and developed to Lifetime-Homes standards, making these attractive and appropriate for older people.

2.5 It is not possible to comment on the proposed open market mix as I have been unable to locate a key or table in any of the supporting documentation. The 2019 update of the SHMA sets out the targets for the breakdown of different size dwellings for Owner Occupation as follows: -

Table 4.4e Size of new owner-occupied accommodation required in Mid Suffolk over the next 18 years

Size of home	Current size profile	Size profile 2036	Change required	% of change required
One bedroom	707	1,221	515	7.2%
Two bedrooms	5,908	8,380	2,472	34.4%
Three bedrooms	13,680	15,784	2,104	29.3%
Four + bedrooms	12,208	14,303	2,096	29.2%
Total	32,502	39,688	7,186	100.0%

3. Affordable Housing Requirement:

Affordable Housing Requirement	<p>35 % of units = 11 affordable units</p> <p>The affordable housing would be made available to meet district wide need if provided on site. Due to the location of this site and consideration of its sustainability and impact on affordability we are seeking a Commuted sum in lieu of on-site accommodation.</p> <p>The indicative layout shows the AH as plots 3 – 13 inclusive. I am unable to identify the dwelling types or sizes from the plan for any of the dwellings proposed.</p>
Commuted sum calculation	<p>This calculation is based on the housing units we would have sought on site if considered to be a suitable location (see below)</p> <p>Total required = £838,329.80</p>
Detailed Breakdown Rented Units	<p>General Needs affordable rented in the form of:</p> <p>2 x 1 bed 2-person houses @ 58 sqm 4 x 2 bed 4-person houses @ 79 sqm 2 x 3 bed 5-person houses @ 93 sqm</p> <p>Total = 8 dwellings</p>
Detailed Breakdown Intermediate Units	<p>General Needs Shared Ownership dwellings:</p> <p>3 x 2 bedroom 4-person houses @ 79 sqm</p> <p>3 dwellings in Total</p>

Other requirements	<p>Payment of the commuted sum: -</p> <p>If this application is granted planning permission the S106 agreement needs to include a trigger point for the payment of the Commuted Sum.</p> <ul style="list-style-type: none"> • (a) not Occupy or permit Occupation of more than 33 per cent (33%) (rounded down to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (33%) of the Affordable Housing Commuted Sum payment is made to the Council. and • (b) not Occupy or permit Occupation of more than sixty-six per cent (66%) (rounded down to the nearest whole Dwelling) Market Housing Units in each Phase until sixty-six per cent (66%) of the Affordable Housing Commuted Sum payment has been made to the Council, and • (c) not to occupy or permit occupation of more than eighty per cent (80%) rounded up to the nearest whole dwelling) Market Housing Units until the remainder of the Affordable Housing Commuted sum payment has been paid.
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Recommendation: -

Application not supported by Strategic Housing.