

Consultee Comments for Planning Application DC/18/02633

Application Summary

Application Number: DC/18/02633

Address: Land At Bickers Hill Laxfield IP13 8EZ

Proposal: Outline Planning Application (some matters reserved) - Erection of up to 5 No. dwellings including access.

Case Officer: Jack Wilkinson

Consultee Details

Name: Mr Nick Woodhead

Address: 2 Myrtle Cottages, Mill Road, Woodbridge IP13 8LQ

Email: laxfieldparishclerk@gmail.com

On Behalf Of: Laxfield Parish Clerk

Comments

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

Visual intrusion: The view from Laxfield's Conservation Area would be seriously compromised.

Pedestrian safety: The access to Hill Farm Road is off a narrow section of Bickers Hill Road where there is no footpath.

Overdevelopment: The council's own annual monitoring report identifies land further up Bickers Hill for development and permission has been granted for 10 properties. Any more would be dangerous as well as damaging to a quiet area of the village.

Environment: The land is a designated County Wildlife Site.

Access: The required visibility splays would destroy the hedgerows. Even then the positioning on the brow of a hill would make access dangerous.

Village opposition: District councillor objection: Cllr Julie Flatman is asking for a site visit and is minded to call in the application to planning committee. Six members of the public attended the planning committee meeting to voice their objections.



Historic England

Mr Jack Wilkinson
Babergh Mid Suffolk
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582740

Our ref: P00950511

22 January 2019

Dear Mr Wilkinson

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

**LAND AT BICKERS HILL, LAXFIELD, SUFFOLK, IP13 8EZ
Application No. DC/18/02633**

Thank you for your letter of 16 July 2018 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.

Historic England Advice

This application seeks outline planning permission for the erection of up to five dwellings. The site is adjacent to Laxfield Conservation Area and the grade II* listed Waterloo House. Historic England previously provided comments in our letter of 02 August 2018 where we raised concerns regarding the proposed cul-de-sac layout of the development.

The previous scheme proposed five dwellings positioned in a cul-de-sac arrangement with one house and a double garage facing Bickers Hill and another house angled on the corner partly facing the Bickers Hill. We considered this layout at odds to the existing linear development of Laxfield and thus to be harmful to the historic significance of the conservation area. The amended scheme now proposes three dwellings addressing Bickers Hill which are only one plot deep. This follows the settlement pattern of Laxfield and is more in keeping with the character of the conservation area.

The National Planning Policy Framework identifies that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 184). Paragraph 192 of the NPPF states that when determining applications local planning authorities should take account of



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





the desirability of new development making a positive contribution to local character and distinctiveness. Paragraph 193 also states that when considering impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of the level of harm. Paragraph 194 states that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Finally, where development proposal will 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 scheme (paragraph 196).

Historic England does not object to the amended application and considers the new linear layout that addresses Bickers Hill to be more reflective of the settlement pattern and would have less harm on the historic significance of the conservation area. However, given the high level of architectural quality of the village and the site's close proximity to a grade II* listed building, the success of this scheme will depend on the high quality of materials and design of the buildings and these should also be considered.

Recommendation

Historic England has no objection to the application on heritage grounds to the proposed amended linear layout of the three new dwellings. We consider that the application meets the requirements of the NPPF, in particular paragraph numbers 192, 193, 194 and 196.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

Sophie Cattier

Assistant Inspector of Historic Buildings and Areas
E-mail: sophie.cattier@HistoricEngland.org.uk





Mr Jack Wilkinson
Babergh Mid Suffolk
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582740

Our ref: P00950511

2 August 2018

Dear Mr Wilkinson

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

**LAND AT BICKERS HILL, LAXFIELD, SUFFOLK, IP13 8EZ
Application No. DC/18/02633**

Thank you for your letter of 16 July 2018 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.

Historic England Advice

The application seeks outline permission for the erection of up to five dwellings at Land at Bickers Hill, Laxfield. The site is adjacent to Laxfield Conservation Area and the grade II* listed Waterloo House. A conservation area appraisal has been produced by Mid Suffolk District Council which highlights the linear pattern of the settlement and the close relationship the village has with the countryside. The relationship with the countryside is due partly to one plot deep development which allows for glimpsed views out to the open countryside. It is also noted that nowhere within the conservation area does it feel 'built up'. Waterloo House is one of four grade II* listed buildings in the village and is in the vernacular style. It dates from the mid-16th century and is a fine jettied timber framed building.

The current scheme proposes the construction of up to five dwellings to the east of the village, adjacent to the conservation area boundary and Waterloo House. From the information submitted alongside the application, pre-application advice was sought from the local planning authority where the applicant was advised to develop a scheme that would follow the existing linear development of the village. The proposed site layout does not do this. Five dwellings are positioned in a cul-de-sac arrangement with one house and a double garage facing Bickers Hill and another house angled on the corner partly facing the Bickers Hill. We would consider this layout at odds to the existing linear development of Laxfield and thus to be harmful to the historic significance of the conservation area.





The National Planning Policy Framework identifies that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 184). Paragraph 192 of the NPPF states that when determining applications local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness. Paragraph 193 also states that when considering impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of the level of harm. Paragraph 194 states that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Finally, where development proposal will 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 scheme.

Historic England does not object in principle to the development of this site however we do have concerns regarding the proposed site layout plan. We consider the cul-de-sac layout to be harmful to the significance of the conservation area as it is incongruous to the existing linear settlement. Given the high level of architectural quality of the village and the site's close proximity to a grade II* listed building, the success of this scheme will depend on the high quality of materials and design of the buildings and these should also be considered. We would advise that your Council seek amendments to the site layout to reflect the linear nature of the village and that any new development positively address Bickers Hill.

Recommendation

Historic England has concerns regarding the application on heritage grounds due to the incongruous to the character of the Laxfield Conservation Area which and would result in harm to its significance. 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 184, 192, 193 and 194 of the NPPF. In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Sophie Cattier

Assistant Inspector of Historic Buildings and Areas
E-mail: sophie.cattier@HistoricEngland.org.uk



Date: 19 September 2018
Our ref: 257520
Your ref: DC/18/02633



Mid Suffolk District Council

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir/Madam

Planning consultation: Erection of up to 5 dwellings
Location: Land at Bickers Hill, Laxfield, IP13 8EZ

Thank you for your consultation on the above dated and received by Natural England on 31 August 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

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected sites and landscapes.

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

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 faithfully
Dawn Kinrade
Consultations Team

ANNEX A

Natural England offers the following additional advice:

Protected Species

Natural England has produced [standing advice](#)¹ 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 paragraph 113 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](#)². 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](#).

Environmental enhancement

Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 9, 109 and 152 of the NPPF. We advise you to follow the mitigation hierarchy as set out in paragraph 118 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 may wish to consider off site measures, including sites for biodiversity offsetting. 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.

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

- 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.

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](#).

Your Ref: DC/18/02633
Our Ref: 570\CON\2841\18
Date: 25/07/2018



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: Jack Wilkinson

Dear Jack

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN DC/18/02633

PROPOSAL: Outline Planning Application (some matters reserved) - Erection of up to 5 No. dwellings including access

LOCATION: Hill Farm, Bickers Hill, Laxfield

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:

Condition: Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) any means of frontage enclosure shall be set back 2.4 metres from the edge of the carriageway of the adjacent highway and tapered accordingly to provide splays of $x=2.4m$ by $y=90m$.

Reason: In the interests of highway safety, to avoid obstruction of the highway, maximise visibility splays and provide a refuge for pedestrians.

Condition: The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No. DM01; and with an entrance width of 4.5m and made available for use prior to occupation.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

Condition: The 5827 shall be a minimum width of 4.5 metres for a distance of 10 metres measures from the nearby edge of Bickers Hill.

Reason: To ensure vehicles can enter and leave the site in a safe manner minimising conflict with potential pedestrians using the public right of way.

Condition: The use shall not commence until the area(s) within the site shown on Drawing Number: 16224 101 for the purposes of manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

Yours sincerely,

Mr Kyle Porter
Development Management Technician
Strategic Development

From: Nathan Pittam
Sent: 13 July 2018 11:00
To: Jack Wilkinson <Jack.Wilkinson@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/18/02633. Land Contamination

Dear Jack

EP Reference : 245552
DC/18/02633. Land Contamination
Land Adjacent To Waterloo House, Market Square, Bickers Hill Road, Laxfield, WOODBRIDGE, Suffolk, IP13 8DP.
Outline Planning Application (some matters reserved) - Erection of up to 5 No. dwellings including access.

Many thanks for your request for comments in relation to the above application. Having reviewed the application and the supporting Phase I investigation by Goldfinch Environmental I can confirm that the risks posed by the former use of the site are acceptable and as such I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk
Work: 07769 566988
websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Consultation Response Pro forma

1	Application Number	DC/18/02633 Bickers Hill, Laxfield	
2	Date of Response	24.8.18	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because the proposed layout would detract from the prevailing pattern of development locally, harming the setting of the Conservation Area and of the listed building. 2. The Heritage Team recommends that any development should be in linear form, and the number of units reduced accordingly. 	
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>The proposal has been subject of pre-application discussion with BMSDC Planning, but no approach seems to have been made to Heritage at pre-application stage.</p> <p>The site is outside the Laxfield Conservation Area but lies very close to it. It is to the rear of Waterloo House, a traditional timber-framed house listed at grade II* in recognition of its fine framing and design. By virtue of the lie of the land, and the house's position and orientation, it forms a prominent and attractive feature along Market Street / Bickers Hill. There are few houses beyond Waterloo House, and none on the south side of the road, so that Waterloo House and most of its historic neighbours, while standing in the historic village core, have an immediate relationship with their rural surroundings.</p> <p>Contrary to advice, the proposal as shown in the illustrative plan would introduce a rather typical suburban layout of dwellings around a cul-de-sac, which would be incongruous in the setting of the listed house. Linear development was clearly requested at pre-application stage so that the development could relate well to existing development within and adjacent to the Conservation Area.</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 principal access would not be off Bickers Hill so that the buildings would appear to address it but without any access. The street frontage to Bickers Hill would include typical back garden treatment and activity, incongruous in the area, and inappropriate in the approach to the Conservation Area in the historic village core.
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>	If access from Bickers Hill is not feasible then the layout should ensure that dwellings to Bickers Hill address the road properly. Further dwelling(s) could form linear development to the Hill Farm road, but backland development would be out of keeping. We appreciate it is doubtful whether five dwellings can be achieved at the site with these constraints, and the number of dwellings should be revised.
7	Recommended conditions	

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Consultation Response Pro forma

1	Application Number	DC/18/02633 as amended (3) Bickers Hill Road, Laxfield	
2	Date of Response	19.6.19	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • no harm to a designated heritage asset because it would relate well to the character, appearance and setting of the Conservation Area, and to the setting of the nearby listed building. 2. The Heritage Team recommends that details of reserved matters be secured by condition. 	
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.	The layout has been amended so that the proposed development corresponds in its density and streetfront treatment to existing development nearby, overcoming our concerns on previous versions.	
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		
7	Recommended conditions	Details of reserved matters including design, materials and landscaping.	

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Consultation Response Pro forma

1	Application Number	DC/18/02633 as amended (2) Bickers Hill, Laxfield	
2	Date of Response	9.4.19	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because the layout and density would be inappropriate in the setting of the Conservation Area and of the listed building. 2. The harm is rated low. 3. The Heritage Team believes this harm can be avoided by amendment to the site area and layout. 	
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>In our response to the initial application we expressed concern over the inappropriate layout which would conflict with the predominantly linear pattern of development locally. The layout was amended to show dwellings addressing the road in a traditional manner, but reduction in the site area resulted in an incongruously dense development. We recommended further revision of the site area and layout.</p> <p>The layout is now amended to achieve greater separation of the dwellings, but as there is no relaxation of the site area this would have limited impact on the density of the site, and results in the two dwellings on Bickers Hill Road presenting their gable to the road. In our view this would not be an appropriate streetscape and would tend to draw attention to the density of the development.</p>	
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	The site area should be revised so as to allow a more sympathetic density and layout to the Bickers Hill Road frontage.	

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.

7	Recommended conditions	
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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.

Consultation Response Pro forma

1	Application Number	DC/18/02633 as amended Bickers Hill, Laxfield	
2	Date of Response	7.2.19	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of..	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because the density of the development would be inappropriate in the setting of the Conservation Area and of the listed building. 2. The Heritage Team believes this harm can be avoided by further amendment to the site area and layout. 	
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>In our response to the initial application we expressed concern over the inappropriate layout which would conflict with the predominantly linear pattern of development locally. We note that the amended layout shows dwellings addressing the road in a traditional manner, and welcome this revision.</p> <p>However, the overall site area has been reduced with the result that three dwellings are proposed along the frontage to Bickers Hill. The density of the built development at the site would appear incongruous in its surroundings, where the denser development of the village centre gives way to more irregular development and more spacious plots. We would recommend further revision of the site area and layout.</p>	
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	The site could be revised so as to allow one of the proposed dwellings to be positioned fronting the lane to Hill Farm, and allowing a more sympathetic density to the Bickers Hill frontage.	
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.



18 September 2018

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

By email only

Dear Daniel,

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

Application: DC/18/02633

Location: Land At Bickers Hill Laxfield IP13 8EZ

Proposal: Outline Planning Application (some matters reserved) - Erection of up to 5 No. dwellings including access.

Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information

Summary

We have reviewed the Preliminary Ecological Appraisal (Abrehart Ecology, February 2018), provided by the applicant, relating to the likely impacts of development on Protected & Priority species.

We are not satisfied that there is sufficient ecological information available for determination of this application. This is because the ecologist has recommended that surveys for rare/important flora, great crested newts, white-letter hairstreak/small heath butterflies, and reptiles should be provided as a collated Ecological Impact Assessment.

These further surveys and Ecological Impact Assessment are therefore required prior to determination. This is needed to provide the LPA with certainty of impacts to the designated features of Laxfield Meadow County Wildlife Site, Protected species and Priority species. It will also ensure that the LPA will demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.



We therefore look forward to working with the LPA and the applicant to provide the missing information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)

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.



5 September 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/18/02633
Location: Land At Bickers Hill Laxfield IP13 8EZ
Proposal: Outline Planning Application (some matters reserved) - Erection of up to 3 No. dwellings including access.

Dear Dan,

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

Holding objection due to insufficient compensation for permanent loss of an area of designated site (County Wildlife Site) and Priority Habitat.

Summary

We have reviewed the Preliminary Ecological Appraisal (Abrehart Ecology, February 2018) and the Ecological Impact Assessment (JP Ecology Ltd, July 2019), provided by the applicant, relating to the likely impacts of development on designated sites, protected species and Priority habitats & species.

We note the comments and objection submitted by Suffolk Wildlife Trust relating to the permanent loss of County Wildlife Site and Priority lowland meadow habitat should this development be consented.

This would be contrary to NPPF and Mid Suffolk Core Strategy Environment Policy CS5 which aims to avoid loss in number and area of ecological designations and continue the Council's approach to protect and manage designated sites of nature conservation importance and encourage wildlife throughout the area.



We have reviewed the additional surveys, contained within the Ecological Impact Assessment and are satisfied with overall findings of these surveys. The botany survey has indicated that Pepper Saxifrage has been found scattered throughout the whole County Wildlife Site and this species, as indicated by Suffolk Wildlife Trust's comments, is a qualifying feature of the Lowland Meadows Priority Habitat.

The proposed development would result in the permanent loss of an area of a designated site for nature conservation and Priority habitat.

Consequently, if the LPA is minded to consent this development, adequate and appropriate compensation will be necessary to make it acceptable. This could be securing enhanced management of the remaining area (currently in poor management due to overgrazing by horses) or lowland meadows habitat creation of an area calculated using the Defra biodiversity metrics.

We have reviewed the submitted indicative conservation management plan for the remainder of this County Wildlife Site (CWS) and are concerned that the proposals do not offer any significant change from current management. This therefore does not currently provide enhanced management for the remaining area of the designated site and does not therefore provide sufficient compensation for permanent loss of CWS lowland grassland.

The development as submitted would be contrary to NPPF and Mid Suffolk Core Strategy Environment Policy CS5 which aims to avoid loss in number and area of ecological designations and continue the Council's approach to protect and manage designated sites of nature conservation importance and encourage wildlife throughout the area.

It is therefore recommended that if the development is consented, the remaining CWS should be clearly managed for nature conservation. Enhanced management should include no grazing in spring, a hay crop in summer, and then grazing from late summer through autumn or right through the winter. This would allow plants to flower and set seed in spring and summer, and reduce the impact of overgrazing and help restore the condition of this CWS grassland rather than just maintain the existing situation.

Therefore, we are not satisfied that sufficient information is currently available for determination of this application. We recommend that further details on an appropriate conservation management scheme are provided by the applicant's ecologist to ensure adequate compensation for this development. This is necessary to deliver appropriate compensation for the permanent loss of part of Laxfield Meadow County Wildlife Site and Lowland Meadow Priority Habitat and ensure that the LPA complies with its biodiversity duty under s40 NERC Act 2006.

If adequate compensation is not available, we consider it necessary to maintain our objection to this development on the grounds of loss of an area of designated site for nature conservation and Priority Habitat and net biodiversity loss.

We look forward to working with the LPA and the applicant to overcome our holding objection to this application.

Please contact us with any queries.



Yours sincerely,

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal 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.

**Suffolk Wildlife Trust**

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06 January 2020

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

Dear Mr Cameron

DC/18/02633: Outline Planning Application (some matters reserved) - Erection of up to 3 No. dwellings including access. Land at Bickers Hill Laxfield IP13 8EZ.

Further to our letter on 5th September 2019 following the submission of an Ecological Impact Assessment (JP Ecology Ltd, July 2019), Suffolk Wildlife Trust wishes to respond to the Conservation Management Plan (JP Ecology Ltd, Jan 2020).

We note that pepper saxifrage was found scattered throughout the whole site. This plant is listed as a specialist of low input nutrient regimes under the UK BAP Habitat description for Lowland Meadows <http://jncc.defra.gov.uk/page-5706> and consequently is one of the qualifying features of the UK Priority habitat.

The construction of three houses on part of this site will result in permanent loss of part of Laxfield Meadow County Wildlife Site, representing Lowland Meadow Priority habitat. To compensate for this, 'enhancement' of the wider meadow is proposed, through provision and implementation of a Conservation Management Plan. It is proposed to fence off two compartments to allow the meadow to be managed on rotation for grazing and cutting of hay.

Having read the Conservation Management Plan, we are concerned that the proposed actions will not deliver enhancement and has the potential to be detrimental to this habitat. We are of the opinion that bisecting the meadow into two separate compartments will not deliver the desired enhancement for the following reasons: We are not aware that this site has any history of cutting for hay and consequently we believe that this change in management would not deliver a benefit to the botanical assemblage at the site. This is because perennial plants do not need to set seed. We believe that extensive grazing of the site is still the best management tool in order to retain the key ecological features. Furthermore, we deem that the erection of permanent fencing will also bring the associated problems, including poaching and dunging along the fence line. This will result in permanent edge habitat being created through the centre of the site, where currently none exists. Therefore, the meadow would be better left undivided and temporary fencing used to facilitate rotational grazing in a manner that is sensitive to vegetation growth patterns and time of year.

We also consider that the proposed review of the management actions only after 10 years is too long an interval. Mapping the baseline plant communities is proposed for Year 1 or 2, but then monitoring surveys at Years 5 and 10. We recommend that monitoring should be annual for the first five years with provision to vary the management regime as required. After five years the time between assessments could then be extended depending on the degree of success in delivering the desired outcomes.

Furthermore, the current tenancy agreement is for a maximum of seven horses, but if this scheme is implemented this would exceed the recommended stocking density of one horse per acre. Reducing the number of permitted horses to a stocking density of six or less should be included within the management plan and be a requirement of any consented application.

Notwithstanding the above, we believe that current proposals for management of this site will not be adequate to offset the loss of habitat or deliver biodiversity net gain. As we currently believe that this proposal would result in a negative impact upon Laxfield Meadow County Wildlife Site, we must continue to **object** to this scheme.

Kind regards

Dr Simone Bullion
Conservation Manager

05 September 2019

By Email Only

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Dear Mr Cameron

DC/18/02633: Outline Planning Application (some matters reserved) - Erection of up to 3 No. dwellings including access. Land at Bickers Hill Laxfield IP13 8EZ.

Further to our letter of 7th September 2018 following the Preliminary Ecological Appraisal (Abrehart Ecology, February 2018), Suffolk Wildlife Trust wishes to respond to the latest submission of an Ecological Impact Assessment (JP Ecology Ltd, July 2019). The latter consultant contacted us by telephone and asked for an opinion, but we have now had time to read the report in full and have the following comments.

We note that additional surveys have been undertaken (covering great crested newt, reptiles, botany and butterflies). It is of significance that pepper saxifrage was found scattered throughout the whole site. This plant is listed as a specialist of low input nutrient regimes under the UK BAP Habitat description for Lowland Meadows <http://jncc.defra.gov.uk/page-5706> and consequently is one of the qualifying features of the UK Priority habitat.

The construction of three houses on part of this site will result in permanent loss of part of Laxfield meadows County Wildlife Site, representing Lowland Meadow Priority habitat. To compensate for this 'enhancement' of the wider meadow is proposed, through provision and implementation of a Conservation Management Plan. It is proposed to fence off compartments to allow the meadow to be managed on rotation for grazing and cutting of hay. However, Page 25 of the report indicates that the site is currently grazed by four horses with grazing being rotated on three main paddocks. Consequently, we fail to see how this can be 'enhancement' as it is maintaining the existing situation, let alone compensating for the loss of part of the meadow to housing.

As we currently believe that this proposal would result in a negative impact upon Laxfield Meadow County Wildlife Site, we must object to this scheme.

Kind regards

Dr Simone Bullion
Conservation Manager