

Consultee Comments for Planning Application DC/19/01401

Application Summary

Application Number: DC/19/01401

Address: Land To The South Of Fitzgerald Road Bramford Suffolk

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping.

Case Officer: Jack Wilkinson

Consultee Details

Name: Ms Diana Stroh

Address: The Parish Room, Ship Lane, Bramford IP8 4AN

Email: bramfordparishcouncil@btinternet.com

On Behalf Of: Bramford Parish Clerk

Comments

Councillors considered both planning applications DC/19/01401 and DC/19/01649 at a recent meeting, and agreed, despite a significant reduction in the number of dwellings, these applications remain unsustainable when considered against current guidelines.

Para 1.2. of the National Planning Policy Framework states sustainable development is a ...material consideration in planning decisions whilst describing the objective of sustainable development as ...meeting the needs of the present without compromising the ability of future generations to meet their own needs (Para 2.8).

Councillors believe the planning authority is currently able to show a five-year land supply, these applications not included, and therefore consider both applications fail to satisfy the sustainable development definition as per the NPPF.

Strategic objectives listed in the draft Joint Local Plan (3.1) include enhancing and protecting the environment and supporting strong and healthy communities and delivering infrastructure.

Councillors feel the proposed developments are contrary to these objectives and will mean the loss of accessible countryside and create a ghost-town effect, with many potential occupants of the proposed dwellings working outside the immediate area, due to the lack of employment opportunities within Bramford.

With the recent loss of the main bus service, Councillors are also concerned that an increase in car-dependent road users, already adversely affected, will mean current infrastructure potentially unable to cope with the additional traffic generated by these applications.

JLP environmental objectives include the protection and enhancement of environmental assets including river corridors, and ensuring new development avoids areas of flood risk, including the reduction of future flood risk where possible, (3.3.v.).

The land identified for these proposed developments borders land that has regularly flooded in recent years, due to the proximity of the River Gipping, and Councillors are concerned that the

concreting over of land currently an asset in limiting flooding will contribute to further problems and are unclear as to how the developers propose to mitigate such factors in the long-term, especially in light of issues at the nearby Wolsey Grange development.

A recent audit on behalf of the Campaign to Protect Rural England charity and The Place Alliance recommended House-builders need to ...advance a more ethical approach to the design of development that prioritises...the health of the environment at large and Councillors are concerned these proposed developments will do little to achieve this, thereby potentially contributing to greater flood risks in the immediate area, which includes a number of heritage, and listed, buildings.

Para 102 of the NPPF states that transport issues should be considered from an early stage so that the potential impacts of development on transport networks can be addressed, opportunities to promote walking, cycling and public transport are identified and pursued and the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account. Councillors are concerned that traffic analysis surveys continue to be undertaken during school holidays, thereby indicating inaccurate levels of traffic movements, and that reference to a suitable bus service able to accommodate the proposed developments is now no longer valid, following the withdrawal of the service linking Bramford with the economic centres of Ipswich and Stowmarket. Councillors remain frustrated at the apparent disconnect of Highways when consulting on planning applications, believing the local roads and transport infrastructure is now unable to cope, leading to increased stresses on local residents attempting to access essential services, such as GP surgeries and schools.

Its noted that the Highways consultee response makes numerous references to the location of a bus stop and the provision of new bus shelters, when services are being withdrawn, and little enthusiasm shown by relevant County Council portfolio-holders to consider suitable replacements. Professor Matthew Carmona, Chair of The Place Alliance, who led the audit for CPRE, states Some highways authorities...do not even recognise their role in creating a sense of place for communities.

Its the hope of Councillors that Suffolks Highways do recognise this role and demonstrate suitable professional curiosity as to the impact these proposals might make on the wider community, including the cumulative effect of other nearby developments along the Gipping Valley and, most notably, Wolsey Grange, Sproughton and Blakenham.

Suffolk County Councils Green Access Strategy identifies policies to promote and improve Public Rights of Way in the county over the next decade and recognises this network as ...an essential asset to us all for our health and wellbeing.

The County Councils vision is ...to get more people using and enjoying Suffolks green access network in line with its aspiration to create the Greenest County, which includes raising awareness with local planning authorities.

Bramford Councillors are, therefore, at a loss to understand how the locating of a new housing development adjacent to a Public Right of Way crossing the site is in keeping with County Council policies and strategies as a result.

Councillors are also at a loss to establish any viable landscaping solutions that would resolve the detrimental effect on this particular green access, with over 100 houses proposed within a few metres of the Right of Way concerned.

Councillors also wish to bring details of a previous refusal decision from 2002, to the attention of the planning authority, on the basis that the grounds for refusal on that occasion remain relevant with regard to these latest applications.

Application 1291/02 proposed 13 dwellings on the site and was refused on grounds that appear relevant today.

It was identified that the proposal would be ...a visual intrusion on this very southern edge of Bramford to the detriment of the rural character and appearance of the area as a whole.

Councillors, therefore, are concerned as to the visual intrusion of up to 115 houses as a result.

The 2002 development was described as car dominated and didnt ...create any sense of place or demonstrate any sensitivity to a prominent visible location.

Again, Councillors are concerned that these, considerably larger, developments will be significantly more car dominated, especially with the recent loss of the main bus service, and that up to 115 houses will be of considerably greater insensitivity to the prominent visible location.

The 2002 development failed to satisfy relevant policies with regard to safe access to and from the site, with the sharp bend in Fitzgerald Road being described as having substandard forward visibility. It was also noted that visitor, delivery and service vehicles, if attending the three road-facing properties, parked on Fitzgerald Road, would further exacerbate the problem.

Councillors note that there are at least 10 properties on the current applications, potentially facing onto Fitzgerald Road, with an access road also located within close proximity to the bend, thereby creating an even greater safety problem than originally identified in 2002, due to the increased volume of traffic to and from the site and the potential increase of parked vehicles on Fitzgerald Road.

In 2002 it was noted that Suffolk County Council, in its publication Development and Public Rights of Way stated the ...character and future use of public rights of way are important and should be retained... with the planning department stating the proposal ...fails to safeguard the rural character of this footpath route...detracting from the amenity that users of the footpath currently enjoy.

This position appears to concur with current Suffolk County Council policy with regard to the benefits of green access and the desire to improve such access and, as previously mentioned, appears to be in conflict with the positioning of up to 115 houses on the site, when the initial 13 dwellings were considered inappropriate.

Bramford Parish Council therefore continues to oppose this application for the reasons identified above.

To: Jo Hobbs <Jo.Hobbs@baberghmid suffolk.gov.uk>

Subject: Ref: Planning applications DC/19/01649 and DC/19/01401 Fitzgerald Road

Hello Jo

For your information, whilst sorting through some old documents here at the Parish Council office, I came across documentation regarding a previous application to develop the Fitzgerald Road back in 2002.

Included in the papers was Mid Suffolk District Council's decision to refuse the application, on four grounds, three of which it could be argued still apply today.

For instance, here are some of the quotes from the refusal explanation, based on a development of only thirteen houses at the time:

'...a visual intrusion on the open southern edge of Bramford to the detriment of the rural character and appearance of the area as a whole.' ".

'...no attempt to show how this development respects the context of the site or traditional development patterns in Bramford'.

'...car dominated...'.

'...does not...demonstrate any sensitivity to a prominent, visible location'.

'...not providing a safe access to and from the site in Fitzgerald Road close to a bend where there is substandard forward visibility'.

'Dangers would be created by the slowing and turning movements of vehicles'.

'Public footpath no. 34 crosses the site...'the present character and future use of public rights of way are important and should be retained...'.

'(The proposal) fails to safeguard the rural character of this footpath...detracting from the amenity that users of the footpath currently enjoy.'

Please could these points be taken into consideration when deciding upon the current applications before you and, if possible, could they be uploaded onto the planning website as further comment for objection.

Many thanks
Diana

BRAMFORD PARISH CLERK

From: BRAMFORD PARISH CLERK <bramfordparishcouncil@btinternet.com>
Sent: 22 April 2019 15:33
To: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Subject: Ref: Bramford Parish Council's consultee response to the Fitzgerald Road planning applications

Hi Jo

Please could you add the following to both DC/19/01649 and DC/19/01401 planning applications for Fitzgerald Road, Bramford.

Councillors considered this application and wish to make the following observations. In light of these observations, and the significant objection from local residents, Bramford Parish Council supports the feelings of the community and objects to these proposed duplicate developments.

The Parish Council considers the failure of Mid Suffolk District Council to adopt an up-to-date Local Plan, over a number of years, as critical to the achievement of sustainable development, in accordance with the National Planning Policy Framework, in that ‘...clear policies that will guide how the presumption should be applied locally...’ are not fit for purpose (para 15, NPPF).

Para.150 of the NPPF states ‘...local plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities’.

The Parish Council feel the continued delays in consulting with local communities over the proposed Joint Local Plan, going back to 2017, indicates the local planning authority has failed to comply with this requirement, forcing unsuitable and unsustainable development onto the local community.

Para.153 states ‘Each local planning authority should produce a Local Plan for its area...that can be reviewed...to respond flexibly to changing circumstances’.

Without an up-to-date Local Plan in place Parish Councillors feel the local planning authority is in no position to review such a document in line with this requirement, again forcing unsuitable and unsustainable development onto the local community.

Para.156 states local planning authorities should set out ‘strategic priorities’ to deliver the provision of infrastructure for transport, flood risk, health, security, community and cultural infrastructure and other local facilities.

The Parish Council believes that none of these considerations have been suitably identified within the applications submitted for this development, even if the new Local Plan were in place to do so. Para 157 indicates a preferable 15-year time horizon for drawing up a Local Plan which leaves the current document significantly inadequate and unreliable.

Para.159 states a local planning authority ‘...should have a clear understanding of housing needs...’ through a Strategic Housing Market Assessment, which should identify the scale and mix of housing the local population is likely to need over the plan period.

Parish Councillors have yet to see a copy of this document. They are unaware of the age of such a document, bearing in mind the age of the Local Plan, and consider this to be a significant area of concern as to whether suitable housing is being considered for Bramford.

Para.162 states the local planning authority should work with other authorities and providers to ‘...assess the quality and capacity of infrastructure...’ including transport, health, social care, education and flood risk, and its ability to meet forecast demands.

The Parish Council believes that Mid Suffolk DC has fallen well short in anticipating the cumulative impact of this, and other substantial developments either approved or awaiting a decision, on Bramford residents. Main road structures in and out of the village are not suitable for the anticipated increase in vehicular movements, effectively trapping local residents. No provision has been made for new health-care facilities for a number of years and residents are forced to attend GP surgeries in Ipswich that are surely near capacity. The promise of pre-school facilities is short-lived and unsustainable if secondary schools are unable to accommodate the increased demand.

The Parish Council remains unconvinced over the promise of infrastructure funding when much of this is consumed by relevant authorities at a national level, thereby leaving local communities without necessary facilities.

The Parish Council remain considerably concerned over Highways input, believing the need for an overview of the impact all planning applications in the area, from Great Blakenham to Wolsey Grange, should be considered as a whole. They feel that this particular consultee is failing to reflect the true impact of development in the area as a result.

Paras 178 and 179 state local authorities have a duty to cooperate on planning matters that cross administrative boundaries, with the Government expecting areas of common interest to be diligently undertaken, and that local authorities should work collaboratively with other bodies in the production of a Joint Local Plan regarding strategic matters, such as joint infrastructure.

The Parish Council fail to see how this is being implemented by Mid Suffolk and Babergh District Councils, resulting in the steady creep of housing development between Bramford and Sproughton and the apparent eventual demise of two unique, individual rural communities.

Councillors therefore believe the local planning authority is unlikely to satisfy the requirements under para.181, where evidence will be expected to demonstrate effective cooperation to plan for cross-boundary impacts when Local plans are submitted, when both Mid Suffolk and Babergh District Councils are far from submitting any such plans in the foreseeable future it seems.

In conclusion the Parish Council believes that sufficient sustainable development is already planned or ongoing within the Bramford area (Cemex site – 300 houses, Fisons – over 90 houses, By Pass Nurseries – up to 20 houses) to satisfy NPPF criteria and that consideration should be given to delaying the granting of further major development for at least a five year period, to establish whether existing infrastructure can cope with the already increasing demands being made upon the parish.

Many thanks
Diana
Clerk to Bramford Parish Council



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DC/19/01401 - DC/19/01649

Hopkins Homes application, Fitzgerald Road, Bramford.

Sproughton parish Council have agreed and support the comments submitted by Sproughton Working Group which form part of our response.

Development along the Gipping River Valley appears to be being pursued recklessly ignoring the limitations of the area and the damage that is being done to the special landscape that is associated exclusively with the river valley due to its topography and history. This reckless gluttony for development appears to rely on the A14 corridor because it lies adjacent to all of these proposed developments but completely ignores the limited access from this area to the A14 and the limitations of the one minor 'B' road the B1113 which this area is actually reliant on that is simply not fit for purpose for so much development. This comes not just from current and several other proposed housing developments but also a significant increase in commercial development. Due to the limitations along the B1113 this level of development is not sustainable and reference to the A14 is pure deception as transport from this whole of the Gipping River Valley area has to first negotiate the B1113 and several other inadequate roads before there can be any access to the A14. Creating the image of sustainability by demanding 106/CIL funds that may or may not end up devoted to the area that will suffer from the expansion is just smoke and mirrors and the real elephant in the room, the road network that makes this level of development unsustainable, is being ignored.

This is a rural, village area with communities separated along a green and treasured river valley by greenfield special landscape areas and wildlife corridors that visually separate communities. This development will close that gap with Sproughton effectively linking both communities visually with an area of little more significance than an urban park between them. This impact will be even worse if the development proposed by Hopkins in Sproughton is approved. This is in effect linking both communities and in breach of NPPF guidelines to prevent coalescence between communities which is especially rejected by the NPPF along valley or road corridors as ribbon development, which this is effectively a large example of as both communities are being extended along the road/river valley between them. The present rural village setting of the two communities is separated by historically significant farmlands where distant views of listed buildings are the only links between the two villages. Both or either of the Sproughton and Bramford applications by Hopkins will close that gap with modern houses separated by little more than a field and a couple of ditches.

Reducing the gap between the two communities will also have a detrimental effect on the wildlife of the area as this wide space provides undisturbed access for wildlife from the wider special landscape area that represents some of the oldest historic farmland of Suffolk into the actual River Gipping Valley corridor that in turn feeds wildlife into the wildlife areas of Ipswich such as Chantry Park, Chantry Vale and the Chantry Cut Island. The gradual throttling of this corridor will eventually cut off these wildlife areas from the surrounding countryside other than via inadequate narrow urban greenway provisions which are unattractive to true wildlife.

We are concerned about the reserve capacity of the SUDs provision for this development. Sproughton lies immediately downstream and the recent floods in December have been some of the worst from local recollection which raises concerns about the level of development upstream of Sproughton creating increased surface water run off. These floods did not develop from a 'once in a hundred years rain storm' but from sustained rain over several days. We do not feel the SUDS assessment criteria which is basically a 'once in a hundred years storm' followed by 'half a storm', is robust enough. These may be adequate to avoid flash floods within a proposed development, however wider area or regional flooding is normally the consequence of sustained heavy rain, typically when a series of winter depressions follow each other along the Polar Front sitting across

the UK. When this happens over several days or even weeks the build up of surface water does not result in flash floods but in a massive build-up of water along the river valleys. This has been the cause of the most severe regional flooding events which the country is experiencing almost annually now and it is difficult to understand why this is not considered as a risk factor by planners, especially where development is proposed along the sides of a river valley posing a threat to the villages downstream within the valley.

We are also concerned about the escalating flood risk predictions. The fact that the planners have been given a report that says the development conforms with the flood risk projections accepted today will be of little comfort to the residents of Sproughton if in ten years our village suffers a flood that is of the magnitude of the predicted risks accepted tomorrow. We accept that flood risk assessment are based on future projection but it has become commonplace to see flood risk predictions increasing significantly, and regularly, as authorities slowly, and reluctantly, acknowledge the true threat of Global Warming.

Failing to recognise these issues ignores the fact that Sproughton, which developed around the mill at a bottleneck in the river valley, is increasingly at risk from a flooding risk that didn't exist for hundreds of years until planners started proposing housing developments upstream of our village. Why should our residents, their homes and our heritage rich village be treated with a complete lack of any concern just so that developers can make an easy profit.

It is becoming evident that planners and developers have been looking at development along the A14 corridor for many years but they appear to have ignored the consequence of this being a River Valley and only focused on the A14 corridor. Every development along this valley increases the potential flood risks along the valley from SUDS pond overflow. There appears to be a legal, but completely unrealistic, reliance on developers expert reports based on today's minimum criteria which will almost certainly not be up to the criteria of tomorrow with disastrous consequences for our village. When that happens who will take responsibility as it is almost certain that every responsible body will say that there were reports in place that showed the provisions were adequate. Typically this attitude has been at the heart of flooding issue for over a year in Sproughton where a developer has created a flood problem they have refused to rectify. Our local authorities who approved the development took no responsibility or lead and now only with the intervention of our MP are we seeing a potential resolution. The flood risk to Sproughton from this and all the other proposed developments along the river valley must be looked at realistically and robustly.

Character Area (NCA) and adjacent to a Special Landscape Area

One of the most precious natural assets in England is its landscape. Babergh makes a valuable and varied contribution to this. Sproughton lies within an SLA and Bramford is adjacent to this

1. Building 115 houses will neither maintain nor enhance the landscape qualities of this area, the open space and distinctive visual impact of the site.
2. The proposed site will not harmonise with the adjacent Special Landscape area as it is a modern layout, it would be detrimental to the visual impact of the traditional location and community

3. With a block of three-story town style houses at the centre of the site it is uncharacteristic and imposing on a valley floor.
4. The site is also a Greenfield site which is land which has not been previously developed, or land that has no recent history of development (e.g. farmland).
5. The site is adjacent to a Special Landscape Area forming the River Gipping Valley, and the site is within close proximity to a European designation known as the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, which are European sites and also notified at a national level as the Orwell Estuary Site of Special Scientific Interest (SSSI)

Infrastructure Traffic

Within the planning revised December Planning Statement, the neighbouring village of Sroughton is mentioned three times. All for local amenities. At no point does the document suggest that cumulative infrastructure impact is a concern.

The bigger picture involves inadequacies in the larger road system that serves ways in and out of Ipswich, difficulties on the Orwell Bridge and the inability of the A14 to deal with adequate diversions in the event of traffic hold ups. These play a huge part in the gross overloading of Sroughton's High Street, Lower Street, Loraine Way to Bramford and Burstall Lane. These roads are not highways and do not exist to deal with the volume of traffic that they are currently expected to carry.

The increase in houses along the B1113 could be by over 2167. Of those already 754 have been approved and are already under construction. That's in 2.3 miles.

The community have grave concerns over the cumulative impact in locations where other committed and planned future developments also have impact. For example, the current/planned housing developments at Hadleigh, Sudbury, Great Blakenham, Snoasis and Tomato Greenhouse use either or both the Beagle and Wild man Junctions on the B1113. Travelling through Bramford and Sroughton Village to accommodate additional traffic flows individually generated by each particular development. By adding on another 115 for the proposed development, 195 at the Cemex site recently approved both in Bramford and in Sroughton less than a mile away there are applications for 54 homes on the Hopkins Homes site, another 30 for Church Lane, 114 for the Pigeon development. An assessment of the overall cumulative impact at a particular location can only be robust if the total impact from all the individual developments affecting that location are considered. As it stands, we believe the Transport Assessment under-estimates the residual cumulative impacts and their severity.

We also believe that the Joint Councils have not adhered to the NPPF which states that quite clearly that

Para.162 states the local planning authority should work with other authorities and providers to '...assess the quality and capacity of infrastructure...' including transport, health, social care, education and flood risk, and its ability to meet forecast demands.

Mid Suffolk DC has fallen well short in anticipating the cumulative impact of this, and other substantial developments either approved or awaiting a decision, on Bramford residents.

Main road structures in and out of the village are not suitable for the anticipated increase in vehicular movements, effectively trapping local residents. No provision has been made for new health-care facilities for a number of years and residents are forced to attend GP

surgeries in Ipswich that are at capacity. The promise of pre-school facilities is short-lived and unsustainable if secondary schools are unable to accommodate the increased demand. We are unconvinced over the promise of infrastructure funding when much of this is consumed by relevant authorities at a national level, thereby leaving local communities without necessary facilities.

There is considerably concerned over Highways input, believing the need for an overview of the impact all planning applications in the area, from Great Blakenham to Wolsey Grange, should be considered as a whole. They feel that this particular consultee is failing to reflect the true impact of development in the area as a result.

Paras 178 and 179 state local authorities have a duty to cooperate on planning matters that cross administrative boundaries, with the Government expecting areas of common interest to be diligently undertaken, and that local authorities should work collaboratively with other bodies in the production of a Joint Local Plan regarding strategic matters, such as joint infrastructure.

We fail to see how this is being implemented by Mid Suffolk and Babergh District Councils, resulting in the steady creep of housing development between Bramford and Sproughton and the apparent eventual demise of two unique, individual rural communities.

Therefore believe the local planning authority is unlikely to satisfy the requirements under para.181, where evidence will be expected to demonstrate effective cooperation to plan for cross-boundary impacts when Local plans are submitted, when both Mid Suffolk and Babergh District Councils are far from submitting any such plans in the foreseeable future it seems.

Sewage and surface water Infrastructure

No substantial regard for sewage infrastructure i.e. sewage, surface water contamination of the Gipping river. Documentation suggests soakaways, which seems contradictory to the Agricultural report of heavy clay and poor drainage. Most concerningly is the environmental impact on the River Gipping, which is connected to the site by a series of ditches less than 20m away.

Potential Land for Development: Joint Local Plan

With respect to Bramford, 8 sites have been identified in total (6 for housing and 2 for employment). These essentially cover most of the Chantry Vale (Wolsey Grange to the River Gipping), the old Sugar Beet site, and developments along the Loraine Way meeting up with Sproughton.

The failure of Mid Suffolk District Council to adopt an up-to-date Local Plan, over a number of years, as critical to the achievement of sustainable development, in accordance with the National Planning Policy Framework, in that ‘...clear policies that will guide how the presumption should be applied locally...’ are not fit for purpose (para 15, NPPF).

Para.150 of the NPPF states ‘...local plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.

The continued delays in consulting with local communities over the proposed Joint Local Plan, going back to 2017, indicates the local planning authority has failed to comply with this requirement, forcing unsuitable and unsustainable development onto the local community. Para.153 states ‘Each local planning authority should produce a Local Plan for its area...that can be reviewed...to respond flexibly to changing circumstances’.

Without an up-to-date Local Plan in place the local planning authority is in no position to review such a document in line with this requirement, again forcing unsuitable and unsustainable development onto the local community.

Para.156 states local planning authorities should set out ‘strategic priorities’ to deliver the provision of infrastructure for transport, flood risk, health, security, community and cultural infrastructure and other local facilities.

A better approach would be to pro-rata the allocation across all parishes – this is more simplistic as the JLP states, but some tweaking could be done where appropriate. This would allow settlements to grow in a more organic way without penalising one parish in particular to the extent that it would be absorbed into Ipswich and merge with Sroughton. These developments clearly show that eventually there will be no distinction between the villages and the aims of the Core Strategy, and the BC Planning Department will not have been upheld. There is obvious and clear creeping coalescence.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The effect of the development on the character and appearance of the area will change the village character forever and create a suburbanising effect, particularly as it is in close proximity to Listed Buildings and the open country-side resulting in material harm to the character and appearance of the surrounding area. This is objectionable because NPPF para 47 implies, that this is not a key site which is critical to the delivery of the housing strategy. This development would demonstrably harm the character and appearance of the area and amenities enjoyed by local residents.

There are number of heritage assets in proximity to the site. Including

1. Runcoton House, Loraine Way (Grade II)
2. St Mary the Virgin Church (Grade I)
3. Street Farm Cottage, Vicarage Lane (Grade II)
4. Thornbush Hall (Grade II)
5. Figeons Farmhouse (Grade II)
6. Sroughton Hall (Grade II)

NPPF states in Para 174 Local Habitat and Landscape and Trees

There are several references from the consultant’s comments that gloss over the fact that the visual impact of this development be resolved by additional landscaping, planting of trees etc. This again shows that this is an ill-conceived plan and a speculative development. There are proven animal corridors across Loraine Way, and from Sroughton which connect two woodlands and waterways. There is no provision for either wildlife corridors or ensuring the protection of local animal species including these protected species.

Natural England Response

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

With regard to protected species: Section 28i of the Wildlife and Countryside Act 1981 (as amended)

Natural England’s initial screening of this planning application has identified that the proposed development has the potential to adversely affect a Site of Special Scientific Interest (SSSI)¹ designated for hibernating or breeding bats i.e. the relevant Impact Risk Zones have been triggered. As protected species bats are capable of being a material consideration in the determination of planning applications, in this case they form the notified interest of an SSSI and therefore it is section 28i of the Wildlife and Countryside Act 1981 (as amended) that is the relevant legislation in this case (i.e. for proposals with the potential to affect an SSSI).

The NPPF Para 196 also states:

1. There will be considerable harm to the local environment and NO public benefit:
1. Light pollution - NPPF para 125 requires limitations on the impact of light pollution. There is no apparent documentation that has mastered or considered the effect of this intrusion, with security lights, streetlamps and other sources illuminating the area.
2. Urbanisation and Creeping coalescence
3. Visually intrusive
4. Holds no public benefit
5. Locality to a Special Landscape Area (SLA) and Within the National Character Area (NCA)
6. The effect of the development will have a significant negative impact to the importance on the setting of neighbouring listed buildings and will result in material harm to the settings of a Grade II listed building.

Achieving well designed places NPPF Para 127

1. The development is visually intrusive It does not function well with the context of the rest of the village. It is of an urban design not conducive to the character of the village and its historic setting and six Grade II listed buildings. Along with many aspects mention already in this document.

2. It isn't sympathetic to the local character the design is one of fancy from an investment company and open to significant and detrimental changes by developers. This is creep coalescence and building by stealth.
3. No manner of landscaping or wide roads and public spaces will detract from the increased traffic for the neighbouring community.
4. The impact on the local school will be significant which is already at capacity and the access to the school is down a dead-end road with no parking and is considered a significant hazard and health and safety risk to school children and parents.

Policy FC1.1 Mid Suffolk approach to delivering Sustainable Development

This policy states that in line with policy FC 1, development proposals will be required to

1. *demonstrate the principles of sustainable development*
2. *and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk new style Local Plan.*
3. *Proposals for development must conserve and enhance the local character of the different parts of the district.*
4. *They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents.*

Sustainable development is the development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

This development compromises the heritage assets, local amenity assets, increases the impact via creeping coalescence and ribbon development, is not sustainable in this valley. The impact of this amongst many developments will compromise the ability of future generations to meet their own needs. We sacrifice the coming generations to a valley floor that is covered in houses, to the detriment of our countryside, its wildlife and historic landscape. This proposal does not conform with policy (FC1.1) to *conserve and enhance the local character of the different parts of the district.*

These facts show that the plan is ill conceived, and the design is one of box ticking in regard that the development company have tried to accommodate as many NPPF policy guidelines. IE greenspaces and improved public welfare through dog walks and footpaths. Again, this is on the outmost fringe of the village, and is of no benefit to the local community. Bramford already have two fringe developments on the Cemex Site and Willowbrook sites.

To conclude this application will instigate

1. Historical impact and harm
2. Heritage Landscape and the experience of the heritage context are all endangered.
3. Cumulative growth impact on infrastructure

There is already sufficient sustainable development planned or ongoing within the Bramford area.

The increase in houses along the B1113 could be by over 2167. Of those already 754 have been approved and are already under construction. That's in 2.3 miles.

4. to satisfy NPPF criteria and that consideration should be given to delaying the granting of further major development for at least a five year period, to establish whether existing infrastructure can cope with the already increasing demands being made upon the parish.

There was an application in 2002 for this site and it was refused on the following grounds. Here are some of the quotes from the refusal explanation, based on a development of **only thirteen houses** at the time:

1. ...a visual intrusion on the open southern edge of Bramford to the detriment of the rural character and appearance of the area as a whole.
2. ...no attempt to show how this development respects the context of the site or traditional development patterns in Bramford
3. ...car dominated...
4. ...does not...demonstrate any sensitivity to a prominent, visible location
5. ...not providing a safe access to and from the site in Fitzgerald Road close to a bend where there is substandard forward visibility
6. Dangers would be created by the slowing and turning movements of vehicles
7. Public footpath no. 34 crosses the site...
8. the present character and future use of public rights of way are important and should be retained....
9. (The proposal) fails to safeguard the rural character of this footpath...detracting from the amenity that users of the footpath currently enjoy.

Our concerns run over two villages that feel they will lose their own identity, along with the loss of significant heritage landscape and local distinctiveness.

SPROUGHTON PARISH COUNCIL

Ms Diana Stroh, Clerk to the Parish Council

www.sroughton.onesuffolk.net

20 The Street

SroughtonPC@gmail.com

Bramford

@sroughtonpc

IP8 4EB

Thanks to
As discussed... Di

WITH COMPLIMENTS

DC/19/01649 – Outline Planning Application (some matters reserved) – Residential development of up to 175 dwellings and access, including open space and landscaping (DUPLICATE APPLICATION – DC/19/01401) – Land to the south of Fitzgerald Road.

Sproughton Parish Council is aware of significant objection to this application not only by residents of Bramford in our neighbouring Parish but also from Sproughton. This is primarily due to the erosion of the separation and individuality of the two distinctly separate communities by unacceptable development coalescence which is also Ribbon Development along the Gipping River Valley and B1113 corridor. But also due to the extensive rush of development applications coming forward along the B1113 corridor without any master plan or proper infrastructure planning to accommodate the cumulative impact of so much development on a contained corridor of individual communities. And also due to the significantly adverse impact this development would have in countryside segregating the two communities on its heritage, countryside/landscape and ecological value.

All these planning applications appear to have been promoted by BMSDC failing to complete the emerging Joint Local Plan expediently. The evidence from all the reports and research for the JLP would indicate that we already have sufficient planning applications coming forward for the next 20 years and so by the JLP we have more coming forward than the projected need. This is unsustainable. We are constantly told that because the JLP has not been finalised it cannot be cited as defence against unnecessary development. We would contest this as although the JLP may not be completed the evidence of the reports upon which the JLP is based are still valid. What is more if that indicates that this frenzy of applications is beyond the projected needs then it is unsustainable and the NPPF presumption to support sustainable development upon which argument most of these applications rely becomes invalid.

There is also a plethora of questions over the general lack of any master plan or realistic future provision of infrastructure to support this glut of planning applications along the Gipping Valley.

Para.156 states local planning authorities should set out ‘strategic priorities’ to deliver the provision of infrastructure for transport, flood risk, health, security, community and cultural infrastructure and other local facilities. Though the JLP may not be complete its reports provide a projection of expected growth and the number of applications coming forward including those not yet at application stage must give BMSDC Planning a clear indication of the future infrastructure and transport needs for this confined corridor area but no plan seems to be in place and we as Parish Councils have not been consulted about these future needs.

Para.162 states the local planning authority should work with other authorities and providers to ‘...assess the quality and capacity of infrastructure...’ including transport, health, social care, education and flood risk, and its ability to meet forecast demands. Are Parish Councils excluded authorities? Or is there a plan? So far we have seen nothing to provide the actual local infrastructure needed along the River Valley which would appear to indicate that all the development coming forward is unsustainable.

SCC Strategic Development Report recognises the need for a plan lead approach for the adverse cumulative impact on infrastructure of so much development along the B1113. The design and access statement suggests the site is within walking distance of schools etc but

our understanding is that these are close to capacity and with so much other development coming forward in the area will quickly be oversubscribed. It suggests the close proximity of other services including a supermarket which is highly misleading as the village CoOp is little more than a village store. The closest supermarket being Asda or Morrisons that would need a car for most shoppers

106 payments tend to go to national authorities and spent on main district infrastructure and funding with nothing coming to the immediate local area for provision of necessary local infrastructure. New residents are forced to attend distant surgeries etc. because there is no local provision and even surgeries in Ipswich are now oversubscribed. The road network is insufficient and the lack of local infrastructure forces more and more residents into their cars in an area that is effectively trapped by exit routes that are ancient and inadequate. There is a logical argument for healthcare provision by 106/CIL contributions from all the new proposed developments locally before any more B1113 corridor expansion.

We find the traffic assessments inadequate spurious and faulty and in that respect we support the objection by Clive Harris from our transport committee who has highlighted so many errors. But also what appears to be a failure (Par. 178/179 duty to cooperate by local authorities) to properly assess the cumulative impact of so much development along the Gipping River Corridor From SnoAisis in MSDC to Wolsey Grange in BDC in relation to infrastructure needs and the cumulative traffic impact despite the apparent amalgamation of the two authorities.

We note the travel plan accepts that the site is too remote for pedestrian commuting, for access to rail travel, for access to local schools which we believe will become oversubscribed. The remedy of car sharing is not helpful as although it may be practiced where it works there are only a small number of people who work close to each other at the same times. The statistics for commuting methods are also based on an Ipswich Town model which bears no resemblance to a village community with limited public transport and to remote for pedestrian/cycle commuting for most. Cumulative impact from Claydon and Barham is dismissed due to access to the A14, but many commuters actually take the congested rat runs through the Gipping Valley in preference to the A14 rush hour snarl up and the cumulative impact of all the other local applications coming forward individually seem to be being underestimated. It also suggests mitigation measures in Sproughton after meeting representatives from Bramford and Sproughton, but Sproughton Parish Council has never been consulted and from our local understanding and experience we do not agree these would be adequate or appropriate. Unfortunately we have been here before when 106 funding was supposed to have been secured by MSDC in 2014/15 from SnowAisis applications for cross border traffic mitigation measures in Sproughton. That never happened and we have no confidence any of the proposed funding for Sproughton traffic mitigation will be forthcoming anyway.

- The Travel Plan's content and measures look generic and not really specific to the semi-rural nature of the site.
- At present, Claydon High School is catchment secondary school, however Westbourne Academy is nearest school within Suffolk County Council's School Travel Policy. (www.suffolkonboard.com/school-travel/). This may affect travel habits from residents, as pupils attending Claydon will not be eligible for free school travel, which is likely to require travel by private motor vehicle instead.

- The bus services that currently serve within the vicinity of the site, such as the Ipswich Buses 111 service are infrequent and is currently subsidised. Therefore, this service may be prone to a future cutback and may not offer residents a suitable alternative to the private car.
- The 2011 Census data is incorrect, as this should be for Bramford travel to work area, not Ipswich. Therefore, the highway impact may be underestimated and Travel Plan targets are not likely to be achievable as a result. This will need to be updated accordingly.
- The primary Travel Plan targets should be mainly focused on reducing vehicular trips from the trip generation data provided in the supporting Transport Assessment.
- No remedial measures have been identified if the Travel Plan's targets are not met.”

In relation to traffic measures from the proposed site we are aware that the Fitzgerald junction is already a problem at times and with the cumulative impact along the B1113 from all the other proposed sites this can only get worse which is somewhat overlooked.

We are particularly concerned that lack of coordination between MSDC and BDC may be behind what is clearly coalescence of development between Bramford and Sproughton, two unique and individual rural communities that are however in two different authorities. Is the same level of consideration being given as might otherwise be if both villages were within the same district because the feeling is that this is not so and therefore the two districts are failing in their obligation to coordinate. The two villages are only separated by a couple of fields both of which this developer is trying to build on destroying the traditional boundaries of both villages that has maintained their individuality.

In relation to ecological/wildlife/ landscape and heritage matters this site runs adjacent to a Special Landscape area in the Gipping River. The site is also surrounded by countryside, is overlooked by Hazel wood which is both ancient woodland and SLA with a crisscross of sight lines across the site between listed buildings that the heritage report has not really considered

In this respect there is not just the visual/landscape interaction between the landscape woodland features that include the adjacent SLA but there are sight lines across all this between many listed buildings, Thornbush Hall, Runcton Farm, Grindle, Street Farm Cottage, St Marys Church, Sproughton Manor and now that Hopkins have been halted across their site to all the Sproughton Barns, Hall, Lower street cottages, church and WildMan. This is a massive collection of listed buildings surrounding this green area between the two villages but the heritage report apparently only considers buildings within 500metres.

We fail to understand how the LVIA can suggest the development can have a positive impact on the landscape character. The Public Right of Way that runs across the Southeast side of the site with SLA, The Gipping River and Hazel wood on the valley side opposite is part of a favoured round walking route that also takes in the Northern edge of Sproughton. We fail to see how changing the field the other side of this path for a housing estate can be an improvement to these views that many walkers and ramblers walk from Ipswich to appreciate. We also fail to understand the suggestion that SLA, Rolling Valley Farmlands and Valley Meadowlands have medium levels of sensitivity, and what does that really mean? This combination of landscape character is the same as at Flatford Mill considered to be one of the most sensitive landscapes in the country.

Sproughton Parish Council Objection DC/19/01649 and DC/19/01401 Fitzgerald Road

Ecologically it is still a main link between the wider countryside and the river valley for wildlife and even the applicant accepts there may be adverse impact on wildlife. This green area between Sproughton and Bramford is important for so many reasons as it maintains the heritage links between the many listed buildings across the valley and the wildlife links between the wider landscape and the river valley leading north into the nature reserve beside the river and south towards the island site beside the Sproughton Enterprise site which has an abundance of wildlife including European protected species. This development will constrict and throttle the wildlife/ecological green link for these sites and the wider countryside without any attempt at betterment, improvement or mitigation as might be expected under NPPF Paragraph 97 which states that open space should not be built on unless the loss resulting from the proposed development is replaced by equivalent or better provision in terms of quantity and quality in a suitable location.



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

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

Your Ref: DC/19/01401

Our Ref: IESCCG/000120/BRA

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

22/01/2020

Dear Sir/Madam

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping.

Location: Land to The South Of, Fitzgerald Road, Bramford, Suffolk

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

Background

2. The proposal comprises a development of up to 115 residential dwellings, which is likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. The CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

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

Healthcare Needs Arising From the Proposed Development

4. At the earliest stage in the planning process it is recommended that work is undertaken with Ipswich and East Suffolk CCG and Public Health England to understand the current and future dental needs of the development and surrounding areas giving consideration to the current dental provision, current oral health status of the area and predicted population growth to ensure that there is sufficient and appropriate dental services that are accessible to meet the needs of the development but also address existing gaps and inequalities.

Encourage oral health preventative advice at every opportunity when planning a development, ensuring that oral health is everybody's business, integrating this into the community and including this in the health hubs to encourage and enable residents to invest in their own oral healthcare at every stage of their life.

Health & Wellbeing Statement

As an Integrated Care System it is our ambition that every one of the one million people living in Suffolk and North East Essex is able to live as healthy a life as possible and has access to the help and treatment that they need in the right place, with good outcomes and experience of the care they receive.

Suffolk and North East Essex Integrated Care System, recognises and supports the role of planning to create healthy, inclusive communities and reduce health inequalities whilst supporting local strategies to improve health, social and cultural wellbeing for all aligned to the guidance in the NPPF section 91. The way health and care is being delivered is evolving, partly due to advances in digital technology and workforce challenges. Infrastructure changes and funds received as a result of this development may incorporate not only extensions, refurbishments, reconfigurations or new buildings but will also look to address workforce issues, allow for future digital innovations and support initiatives that prevent poor health or improve health and wellbeing.

The NHS Long term plan requires a move to increase investment in the wider health and care system and support reducing health inequalities in the population. This includes investment in primary medical, community health services, the voluntary and community sector and services provided by local authorities so to boost out of hospital care and dissolve the historic divide between primary and community health services. As such, a move to health hubs incorporating health and wellbeing teams delivering a number of primary and secondary care services including mental health professionals, are being developed. The Acute hospitals will be focussing on providing specialist treatments and will need to expand these services to cope with additional growth. Any services which do not need to be delivered in an acute setting will look to be delivered in the community, closer to people's homes.

The health impact assessment (HIA) submitted with the planning application will be used to assess the application. This HIA will be cross-referenced with local health evidence/needs assessments and commissioners/providers own strategies so to ensure that the proposal impacts positively on health and wellbeing whilst any unintended consequences arising are suitably mitigated against.

The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Deben Road Surgery	6,929	259.00	3,777	-216
The Chesterfield Drive Practice	11,562	375.50	5,476	-417
Total	18,491	634.50	9,253	-633

Notes:

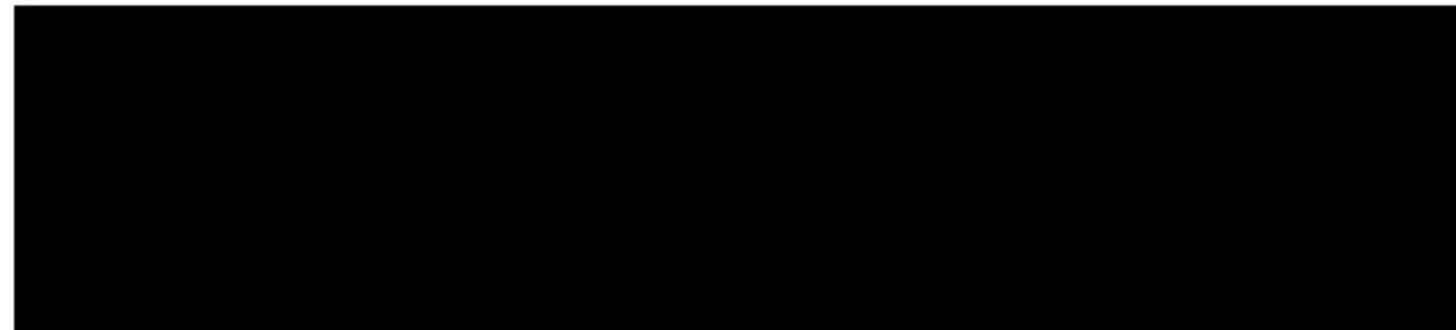
1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
 2. Current Net Internal Area occupied by the Practice.
 3. Based on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

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

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

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

Yours faithfully



Chris Crisell

Estates Planning and Project Support Manager
Ipswich and East Suffolk Clinical Commissioning Group



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

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

Your Ref: DC/19/01401/OUT

Our Ref: IESCCG/000319/BRA

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

08/04/2019

Dear Sirs,

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Location: Land to the South Of, Fitzgerald Road, Bramford, Suffolk

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

Background

2. The proposal comprises a development of up to 175 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There are 2 GP practices within a 2.5km radius of the proposed development, these practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

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

5. The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Deben Road Surgery	6,882	354.55	5,171	-117
Chesterfield Drive Practice	13,291	375.50	5,476	-536
Total	20,173	730.05	10,647	-653

Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice.
3. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size.

6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Deben Road Surgery and Chesterfield Drive Practice, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.

7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.

9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.

10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

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

Yours faithfully

Chris Crisell

Estates Planning and Project Support Manager
Ipswich and East Suffolk Clinical Commissioning Group



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01) Formal Recommendation to an Application for Planning Permission

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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/19/01401

Referring to the planning application referenced above, dated 8 January 2020, application for a residential development of up to 115 dwellings and access, including open space and landscaping, land to the south of Fitzgerald Road, Bramford, Suffolk, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Signature:	Date: 23 January 2020
Name: Mark Norman Highways England: Woodlands, Manton Lane Bedford MK41 7LW mark.norman@highwaysengland.co.uk	Position: Spatial Planning Manager

Annex A Highways England recommended no objection

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

This response represents our formal recommendations with regards to DC/19/01401 and has been prepared by Mark Norman.

This development is a little way off the strategic road network, the application is for 115 dwellings, traffic generations will be diluted before they reach the Strategic Road network if they do at all. The granting of this permission is therefore, unlikely to result in a severe impact upon the Strategic Road



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01) Formal Recommendation to an Application for Planning Permission

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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/19/01401

Referring to the planning application referenced above, dated 26 March 2019, application for the residential development of up to 175 dwellings and access, including open space and landscaping, land to the south of Fitzgerald Road, Bramford, Suffolk, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Date: 28 March 2019

Signature:

Name: Mark Norman

Position: Spatial Planning Manager

Highways England:

Woodlands, Manton Lane
Bedford MK41 7LW

mark.norman@highwaysengland.co.uk

Annex A

This proposal is unlikely to have a material impact upon the strategic Road Network



Planning Applications – Suggested Informative Statements and Conditions Report

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

AW Site 145599/1/0075510

Reference:

Local Mid Suffolk District

Planning

Authority:

Site: Land To The South Of Fitzgerald Road
Bramford Suffolk

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping

Planning DC/19/01401
application:

Prepared by: Pre-Development Team

Date: 9 January 2020

ASSETS

Section 1 - Assets Affected

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

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

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

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

Section 3 - Used Water Network

The sewerage system at present has available capacity for these flows via a pumped discharge regime. Pumped rate/rising main size to be agreed at detailed design stage. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

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

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



Planning Applications – Suggested Informative Statements and Conditions Report

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

AW Site 145599/1/0055138

Reference:

Local Mid Suffolk District
Planning Authority:

Site: Land To The South Of Fitzgerald Road
Bramford Suffolk

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping

Planning DC/19/01401
application:

Prepared by: Pre-Development Team

Date: 11 April 2019

ASSETS

Section 1 - Assets Affected

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

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

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

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

Section 3 - Used Water Network

The sewerage system at present has available capacity for these flows via a pumped discharge regime. Pumped rate/rising main size to be agreed at detailed design stage. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

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

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

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

Next steps

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

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

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

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

Foul water:

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

Surface water:

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

Date: 29 January 2020
Our refs: 305315 & 305326
Your refs: DC/19/01401& DC/19/01649



planninggreen@baberghmidsuffolk.gov.uk

BY EMAIL ONLY
FAO Jack Wilkinson

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

T 0300 060 3900

Dear Jack Wilkinson

Planning consultation:

DC/19/01401 Outline Planning Application (some matters reserved)- Residential development of upto 115 dwellings and access, including open space and landscaping;

DC/19/01649 Duplicate Application

Location: Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Thank you for your consultations on the above dated 08 January 2020 which were received by Natural England on the same day..

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

Natural England agrees with the conclusion of the appropriate assessment record that this proposal is not likely to result in an adverse effect on any international site from recreational disturbance effects.

The bat mitigation recommendations identified in the Preliminary Ecological Appraisal of February 2019 should avoid impacts upon bats using the hibernation site in Little Blakenham Pits Site of Special Scientific Interest (SSSI).

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

Other advice

Further general advice on consideration of protected species and other natural environment issues was provided in our response of 23 April 2019 (ref 279300).

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

If you have any queries relating to the advice in this letter please contact me on 020 802 64908.

Should the proposal change, please consult us again.

Yours sincerely

Patrick Robinson
Norfolk and Suffolk Area Team.

Date: 26 April 2019
Our ref: 277799
Your ref: DC/19/01401



Jo Hobbs
planninggreen@aberghmidsuffolk.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear Ms Hobbs

Planning consultation: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Location: Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Thank you for your consultation on the above dated and received by Natural England on 25 March 2019.

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

SUMMARY OF NATURAL ENGLAND'S ADVICE – European designated sites¹

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

Acceptable mitigation and Appropriate Assessment Record

Natural England agrees with the conclusion of the Local Authority's appropriate assessment record that this proposal is not likely to result in an adverse effect on any international site from recreational disturbance effects.

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

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

The development is part of the local plan core strategy site allocations, and the proposed mitigation is in line with the agreed Suffolk Recreational Disturbance Avoidance and Mitigation (RAMS) Strategy, and Natural England's guidance (attached).

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 3.

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

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

Yours sincerely

Kayleigh Cheese
Local Delivery Team

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

Application details	
Local Planning Authority:	
Case officer	
Application reference:	
Application description:	
Application address:	
Status of Application:	
Grid Ref:	

HRA Stage 1: screening assessment

Test 1 – the significance test: Based on the development type and proximity to European designated sites, a judgement should be made as to whether the development constitutes a ‘likely significant effect’ (LSE) to a European site in terms of increased recreational disturbance

Is the development within 13 km of the below European sites (check NE IRZs)?

- Alde-Ore Estuary Special Protection Area (SPA) and Ramsar site
- Benacre to Easton Bavents SPA
- Deben Estuary SPA and Ramsar site
- Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC)
- Minsmere – Walberswick SPA
- Orfordness-Shingle Street SAC
- Sandlings SPA
- Stour and Orwell Estuaries SPA and Ramsar site (Suffolk side only)

↓ Yes

No ↓

Does the planning application constitute residential development?

- New dwellings of 1+ units included in current site allocations and windfall (excludes replacement dwellings and extensions)
- Houses in Multiple Occupancy (HMOs)
- Residential caravan sites (excludes holiday caravans and campsites)
- Gypsies, travellers and travelling show people plots
- Tourist accommodation

↓ Yes

No ↓

Conclude LSE. This proposal is within scope of the Suffolk Coast RAMS as it falls within the 13 km ‘zone of influence’ for likely impacts and is a relevant residential development type as listed above. It is anticipated that such development in this area is ‘likely to have a significant effect’ upon the interest features of the aforementioned designated site(s) through increased recreational pressure, when considered either alone or in combination.

Proceed to HRA Stage 2: Appropriate Assessment to assess recreational disturbance impacts on the above designated sites.

Conclude no LSE to the above designated sites in terms of recreational disturbance.

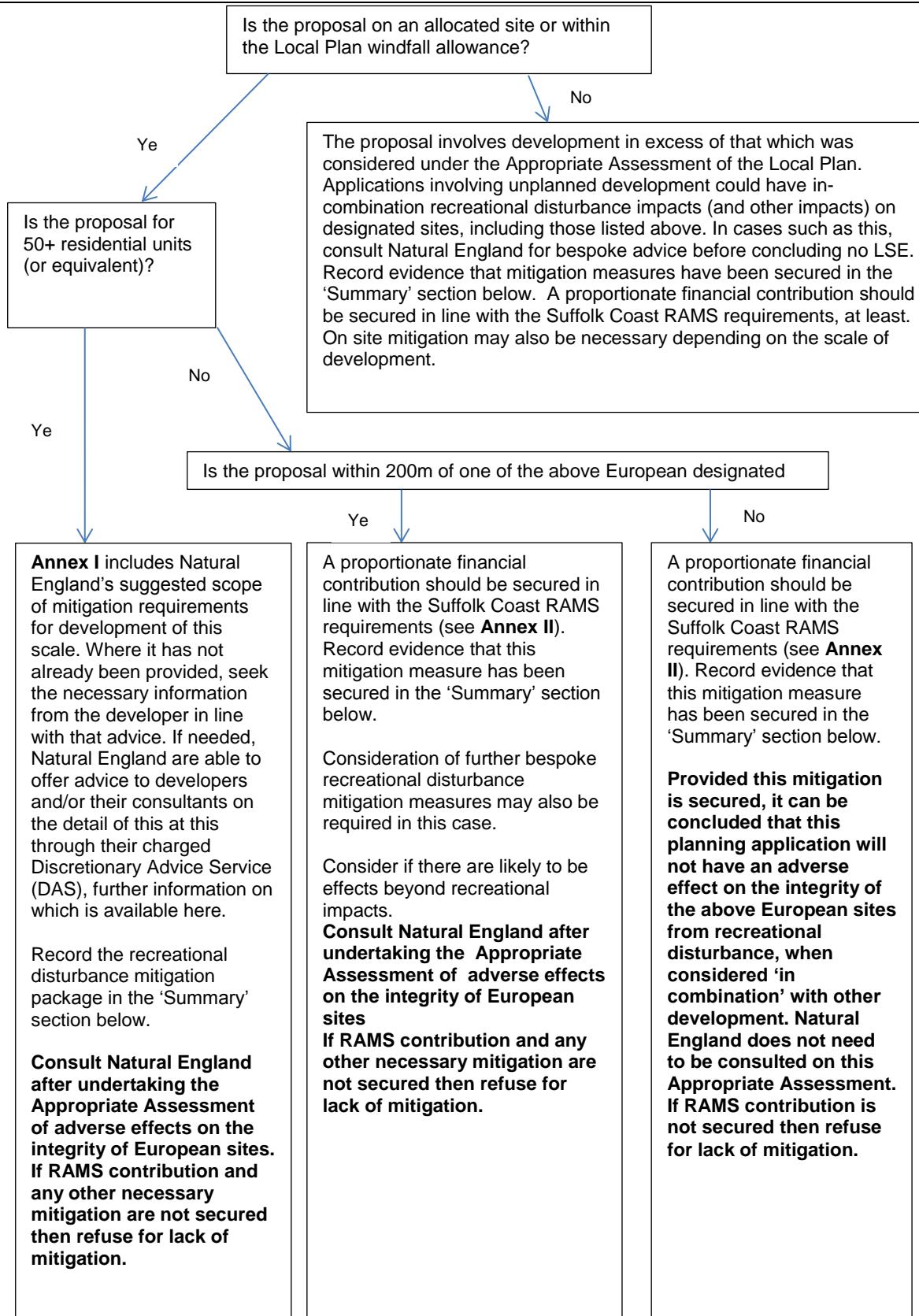
An Appropriate Assessment (AA) is not required where recreational disturbance to these sites is the only issue or recreational disturbance to these sites can be scoped out of any HRA covering other issues.

↓ No

RAMS is not relevant, however other Habitats Regulations considerations should be taken into consideration for non residential developments and in some circumstances a bespoke AA may be required.

HRA Stage 2: Appropriate Assessment

Test 2 – the integrity test: The applicant must provide sufficient evidence to allow the Appropriate Assessment to be made, which is the stage at which avoidance and/or mitigation measures can be considered



Summary of the Appropriate Assessment : To be carried out by the Competent Authority (the local planning authority) in liaison with Natural England (where necessary)

Summary of recreational disturbance mitigation package

[INSERT]

Conclusion

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

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

Local Planning Authority Case Officer comments, signed and dated:

Annex 2 – Natural England’s recommendations for larger scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

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

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated ‘dogs-off-lead’ areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

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

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

Annex 3 – Additional advice

Natural England offers the following additional advice:

Landscape

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

Best and most versatile agricultural land and soils

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

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

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

Protected Species

Natural England has produced [standing advice](#)³ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

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

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)⁴. 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](#).

³ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

⁴ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Ancient woodland, ancient and veteran trees

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

Environmental enhancement

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

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

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

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

Access and Recreation

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

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

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

Biodiversity duty

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

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

Email: planning@aberghmidsuffolk.gov.uk

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

For the attention of: Jack Wilkinson

Dear Jack

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/19/01401

PROPOSAL: Documents received 10th December 2019, Ref: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping.

LOCATION: Land To The South Of, Fitzgerald Road, Bramford, Suffolk

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

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

- The proposed visibility splays for the accesses are sufficient for this application.
- The proposal for 115 dwellings would create approximately 65 vehicle movements within the peak hour (1 vehicle every minute).
- the development is approximately 400m from the centre of the site to the primary school with safe routes for the vulnerable user.
- there are bus stops approximately 200m from the centre of the site with frequent services.

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

Following our previous response dated 5th April 2019, we are unable to make further comment on the Travel Plan until we have received a revised travel plan or technical note taking our previous comments into account. A suitable Travel Plan being submitted prior to determination of the application. The Travel Plan must be in accordance with Suffolk County Council's adopted Travel Plan Guidance (<https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/2019-02-01-FINAL-Suffolk-Travel-Plan-Guidance-Web-Version.pdf>).

CONDITIONS

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

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

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

V 1 - Condition: Before the access is first used visibility splays shall be provided with an X dimension of 2.4m and a Y dimension of 70m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

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

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

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

- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

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

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

B 2 - Condition: Before the development is commenced details of the areas to be provided for presentation and storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

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

NOTES

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

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

the public highway do not give the applicant permission to carry them out. These works will need to be applied for and agreed with Suffolk County Council as the Local Highway Authority. Application form for minor works licence under Section 278 of the Highways Act 1980 can be found at the following webpage: www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/.

A public footpath is recorded through the proposed development area. The applicant is reminded the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates, temporary closures and diversions etc. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

CONTRIBUTIONS

My previous request for marked, paved stops on the development side of the road still stands, but I'm happy to drop the real time now, so the total infrastructure ask would be between £5 and 10,000 depending upon whether they give us land for a shelter at either of these stops and are willing to also pay for one. I would still want stops at either end of the road, but we could get away with only one of them having a shelter. However, if we can get space at both ends then we go up to £15k total.

Passenger Transport

A contribution of £170,000 is required towards passenger transport services for the village which will provide 2 years of sustainable travel opportunities for the residents of the site and further community. Also, the existing bus stops on Fitzgerald Road are to be upgraded, which will benefit residents, visitors to the site and the community. Therefore, raised bus stop kerbs are requested at a cost of £15,000 for construction (or these works can be completed with the s278 agreement).

Highway Mitigation Schemes

Suffolk County Council carried out an analysis of the applications Transport Assessments for the planning applications in the area and found there was a cumulative impact on junctions in Sroughton. The following table shows the requirements for s106 contributions towards the mitigation for schemes:

- New Zebra Crossing north of Wild Man access - £20,000
- Reduce kerb radii and install uncontrolled crossing points - £14,000
- Widening of approach lanes to Beagle roundabout - £36,000
- Cycle Link on Loraine Way - £60,000
- Total Highway mitigation - £130,000

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

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

Email: planning@aberghmidsuffolk.gov.uk

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

For the attention of: Jo Hobbs

Dear Jo,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/19/01401

PROPOSAL: Outline Planning Application (some matters reserved) - Residential development of up to 175 dwellings and access, including open space and landscaping.

LOCATION: Land To The South Of Fitzgerald Road, Bramford

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

The Transport Assessment (TA) indicates four off-site highway measures to the south as mitigation where the development will make a contribution towards the delivery. However, the TA has highlighted a concern regarding vehicles travelling to and from the east (towards Ipswich). Therefore, we would like further evidence that the impact from the site will not require mitigation within Bramford village and Bramford Road in Ipswich.

Details on footway links have not been provided to allow pedestrians to gain safe access to the school and village amenities; no footways or crossing points have been provided along Fitzgerald Road. The only point provided is on the Vicarage Lane junction where no footways are present. Also, pedestrians will be required to cross here with little visibility therefore, not safe for the vulnerable user.

We continue to recommend that permission for the application has a holding refusal unless the above points can be addressed, and we look forward to receiving further information.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

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

Email: planning@aberghmidsuffolk.gov.uk

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

For the attention of: Jo Hobbs

Dear Jo

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN:

PROPOSAL: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

LOCATION: Land To The South Of Fitzgerald Road Bramford

We recommend a holding refusal for the application for the following reasons:

On reviewing the Travel Plan (dated 28th February 2019) the following points will require some further clarification or detail:

- The Travel Plan's content and measures look generic and not really specific to the semi-rural nature of the site.
- At present, Claydon High School is catchment secondary school, however Westbourne Academy is nearest school within Suffolk County Council's School Travel Policy. (www.suffolkonboard.com/school-travel/). This may affect travel habits from residents, as pupils attending Claydon will not be eligible for free school travel, which is likely to require travel by private motor vehicle instead.
- The bus services that currently serve within the vicinity of the site, such as the Ipswich Buses 111 service are infrequent and is currently subsidised. Therefore, this service may be prone to a future cutback and may not offer residents a suitable alternative to the private car.
- The 2011 Census data is incorrect, as this should be for Bramford travel to work area, not Ipswich. Therefore the highway impact may be underestimated and Travel Plan targets are not likely to be achievable as a result. This will need to be updated accordingly.
- The primary Travel Plan targets should be mainly focused on reducing vehicular trips from the trip generation data provided in the supporting Transport Assessment.
- No remedial measures have been identified if the Travel Plan's targets are not met.

- The value of the multi-modal voucher has not been specified. The value of the voucher should allow each dwelling to redeem two one month bus season tickets to Ipswich, or equivalent value in cycle vouchers.

A revised Travel Plan or Technical Note that takes into account the issues raised above will need to be submitted prior to the determination of this application, where the Travel Plan section must be in accordance with Suffolk County Council's adopted Travel Plan Guidance (<https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/2019-02-01-FINAL-Suffolk-Travel-Plan-Guidance-Web-Version.pdf>).

Until the above points can be addressed, we would recommend that permission for the application have a holding refused. I look forward to receiving information requested and revised drawings in due course.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

BMSDC Planning Area Team Green

From: Chris Ward
Sent: 08 January 2020 09:08
To: Jack Wilkinson
Cc: BMSDC Planning Area Team Green; Sam Harvey
Subject: RE: MSDC Planning Re-consultation Request - DC/19/01401

Categories: Katherine

Dear Jack,

Thank you for notifying me about the re-consultation for the proposed residential development at Land to the South of Fitzgerald Road in Bramford. Having reviewed the additional documents submitted, I have no further comment to make at this moment. Please note that any further comment that I make will be included in the formal SCC Highway response that Sam Harvey is leading on.

Kind regards

Chris Ward
Travel Plan Officer
Transport Strategy
Strategic Development - Growth, Highways and Infrastructure
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

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

From: planninggreen@baberghmidsuffolk.gov.uk <planninggreen@baberghmidsuffolk.gov.uk>
Sent: 08 January 2020 08:11
To: Chris Ward <Chris.Ward@suffolk.gov.uk>
Subject: MSDC Planning Re-consultation Request - DC/19/01401

Please find attached planning re-consultation request letter relating to planning application - DC/19/01401 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in

From: Chris Ward <Chris.Ward@suffolk.gov.uk>
Sent: 05 April 2019 09:07
To: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/19/01401

Dear Jo,

Thank you for consulting me about the proposed residential development off Fitzgerald Road in Bramford. I will be providing some comments on the Travel Plan that was submitted as part of the planning application. However, they will form part of the formal Suffolk County Council Highway response that Sam Harvey is leading on to comply with internal protocol.

If this causes you any issues please feel free to get in contact with me.

Kind regards

Chris Ward
Travel Plan Officer
Transport Strategy
Strategic Development - Growth, Highways and Infrastructure
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

MasterGov Matter Number 58744

Planning ref: CDC/19/01401/OUT

Site address: Bramford, Land South East of Fitzge IP8 4AD

Planning Application - Outline Planning Application (some matters reserved)-

Residential development of up to 115 dwellings and access, including open space and landscaping

Date of response: 15 January 2020

Public Health Comments

This application has been screened by Public Health and we considered it as major one, so we would like to recommend to undertake a Rapid Health Impact Assessment (desktop exercise) using the tool developed by London Healthy Urban Development Unit provided in this link <https://www.healthurbandevelopment.nhs.uk/wp-content/uploads/2019/10/HUDU-Rapid-HIA-Tool-October-2019.pdf>. This provides a comprehensive information and guidance how to do this and all references have been updated as of October 2019. Please ignore London related matters although most references are relevant to all developments.

We also would like to recommend to complete a Healthy Urban Planning checklist before the HIA to identify the key issues and impacts, when they are likely to occur (for example at the construction stage, or occupation of the development) and submit it with the HIA report <https://www.healthurbandevelopment.nhs.uk/wp-content/uploads/2017/05/Healthy-Urban-Planning-Checklist-3rd-edition-April-2017.pdf>.

Quality of HIAs are very important and we will be monitoring and evaluating them using the framework developed by Wales HIA Assessment Unit, https://whiasu.publichealthnetwork.cymru/files/8815/3545/2412/Complete_QA_Framework.pdf. This link is for your reference to consider when undertaking HIA for this development.

The applicant should be encouraged to discuss the HIA scoping with MidSuffolk and Babergh District Council and Suffolk Public Health prior to submission. This should address social infrastructure or should be included within the HIA and cross referenced.

Suffolk Public Health is working closely with the NHS and Borough Councils to look at the factors that contribute to good health and the risk of not taking these into account as well as the physical aspects when planning a new development/community.

The State of Suffolk is a key document of the Suffolk Joint Strategic Needs Assessment (JSNA). It is intended to provide an overview of the Health and Wellbeing Strategy, health and wellbeing needs of local population, including the wider issues that affect locals, such as housing, employment, education and the environment. Please visit <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report>.

Place Based Needs Assessment for specific geography including MidSuffolk and Babergh has been produced recently which focused on wider determinants of health in the localities which can be found here <https://www.healthysuffolk.org.uk/jsna/pbna>

Both reports look at health needs of the local population and current health outcomes. These outcomes should be used in the health impact assessment and are particularly important for monitoring health outcomes once a development has commenced. In addition, the following points need to be considered for the development:

1. Neighborhood

Neighborhoods are places where people live, work and play and have a sense of belonging. The design of neighborhood can contribute to the health and wellbeing of people living there. Several aspects of neighborhood design (walkability and mixed land use) can also maximise opportunities for social engagement and active travel¹. Equally investing in infrastructure to support walking & cycling is associated with increased physical activity. It would be advisable to have secure cycle rack/sheds to facilitate cycle use.

There is not enough information provided for this development so we assume this would be higher density housing developments. Although increased housing density is associated with higher levels of physical activity and active travel among all age groups, this needs clear guidelines for dealing with issues such as pets, parking and noise in order to not cause undue stress and poor mental health². It is important that this is fully recognised in any new planning application.

There is evidence of moderate quality that street connectivity is positively associate with physical activity, so this is another area needs to be carefully considered with good design.

The dense neighborhood that proactively promote increased walkability and street connectivity with safe infrastructure can help people to be physically active thus help people to reduce some ill health, eg reduce the risk of diabetes 2, cardio-vascular diseases, mental health, some cancers and improved mental wellbeing.

In addition, we recommend safe passage and connectivity back to the town and existing neighborhood.

As this is a large development, we recommend considering a dedicated space for community to promote physical activity, engagement of mixed population groups, health & care facility etc. It would be advisable to explore and create opportunities for multi-use and the co-location of services

¹ Spatial planning for health, PHE June 2018

² Haigh, F. & Ng Chok, H., Harris, P. (2011) *Housing density and health: A review of the literature and Health Impact Assessments*. Centre for Health Equity Training, Research and Evaluation (CHETRE), University of New South Wales: Sydney.

Social inclusion – the development may affect social inclusion particularly in relation to integration with the existing areas and therefore should be included within the HIA. The above-mentioned reports have detailed information in this regard.

2. Healthy Housing

As this is new build we assume it will meet all quality standards with adequate internal space including sufficient storage space, separate kitchen and living space. Living in good quality and affordable housing is associated with numerous positive health outcomes for general population and those from vulnerable groups, including improved social outcomes among older adults, reduced injury among older adults and children and improved physical and mental health.

It would be important to consider affordable, diverse and secure housing for groups with vulnerabilities: those with learning disabilities, chronic medical conditions and homeless etc as this helps to reduce risky behaviors, improve engagement with health and social services & improved health outcomes.

It is important to provide accessible homes for older, less mobile and disabled people

3. Healthier Food Environment

The importance of eating a healthier and balanced diet can protect the body against diseases and health conditions and evidence indicates that a poor diet is related to 30% life years lost in disability or early death³.

There is a good evidence of food growing, provision of and access to allotments and adequate garden space on mental wellbeing of general population by improving physical health which in return reduce the risk of cardio-vascular diseases, type 2 diabetes, some cancers etc. So, we would recommend the new development should consider such allocation for residents or access to specific area.

4. Healthy environment

Exposure to air pollution, excessive noise does impact the health of population negatively. Construction noise and dust also need to be carefully considered and mitigations are considered in the HIA.

The traffic could be the main potential sources of poor air quality in this area during the construction as access roads to be used to get to construction site. At the same time traffic would be the main source of air pollution after the construction.

³ FPH, 2005

In addition, there will be a need for onsite energy production by renewable energy, and confirmation is needed that this will not affect air quality e.g. biomass boilers may have a negative effect on air quality and therefore would need to be included in the assessment.

The use of any existing PROW/cycle ways may be affected post construction and an assessment may need to be included with the HIA.

There is a wealth of evidence that provision of access and engagement opportunities with the natural environment reduce mortality risk due to cardiovascular diseases, encourage physical activity and active travel among all age population. So we recommend the development facilitate such positive environment for residents and protect them from above mentioned environmental hazards.

Climate change and its negative impact on elderly population (heatwaves/cold weather) needs to be considered alone with flood risks.

5. Active travel

Travel plan can address the environmental and health impacts of development by promoting sustainable transport, including walking and cycling. Active travel (i.e., cycling, walking and use of public transport) has the potential to increase physical activity levels and improve physical and mental wellbeing. Prioritisation of active travel may also reduce over reliance on motorised transport which may contribute to improved air quality and a reduction in road injuries. We would recommend the applicant consider active travel provisions for all age population group, provide with shed/racks for those who chose to travel by cycles, enabling mobility for all ages (especially for those who are mentally and physically impaired) and activities and providing access to recreational space. In addition, need to consider traffic calming measures in areas where it is close to main roads and roundabouts.

Space for pedestrians and cyclists should be given priority over commercial and private vehicles. Consideration to minimise car use by reducing car parking provision, supported by controlled ones, car free development and car clubs.

Dr Mash Maidrag
Consultant in Public Health

Any queries please contact mashbileg.maidrag@suffolk.gov.uk

Your Ref: DC/19/01401
Our Ref: SCC/CON/0147/20
Date: 13 January 2020
Enquiries to: Ross.Walker@suffolk.gov.uk



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

For the attention of: Jack Wilkinson

Dear Jack Wilkinson

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN:

PROPOSAL: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping

LOCATION: Land to the South of Fitzgerald Road, Bramford, Suffolk

Notice is hereby given that the County Council as Minerals and Waste Authority make the following comments:

Thank you for consulting us on the application, which is in the minerals consultation area.

In accordance with Policy 5 of Suffolk minerals core strategy (2008) the council will not object to the proposal as sand and gravel which may be present on the site is not of economic value and the site does not fall within 250 M of a site allocated in the specific site allocation DPD.

Yours sincerely,

Ross Walker
Planning Officer
Planning Section
Strategic Development - Growth, Highways & Infrastructure

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 27 January 2020 08:24
To: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Cc: Jack Wilkinson <Jack.Wilkinson@aberghmidsuffolk.gov.uk>
Subject: 2020-01-27 JS Reply Land To The South Of, Fitzgerald Road, Bramford Ref DC/19/01401

Dear Jack Wilkinson,

Subject: Land To The South Of, Fitzgerald Road, Bramford, Ref DC/19/01401

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/01401.

We have reviewed the following submitted documents and we recommend approval subject to conditions:

- Site Location Plan (No Reference)
- Illustrative Masterplan Feb 2019
- Site Investigation Report ref GN21989_SI
- Flood Risk Assessment and Drainage Strategy ref 211443 Rev P1
- Proposed Drainage Layout Ref 211443-302-P2
- Letter from Canham Consulting Ref 21143

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:

- a. Dimensioned plans and drawings of the surface water drainage scheme;
- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
- c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Qbar or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
- d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;

- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
 - i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 - 1. Temporary drainage systems
 - 2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - 3. Measures for managing any on or offsite flood risk associated with construction
 - h. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The scheme shall be fully implemented as approved.

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

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

- 2. Within 28 days of completion of the final dwelling, details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

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

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act 1991
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton

Flood & Water Engineer

Flood & Water Management

Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX

<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;

BMSDC Planning Area Team Green

From: Gemma Stewart
Sent: 08 January 2020 10:41
To: Jack Wilkinson
Cc: BMSDC Planning Area Team Green
Subject: Planning Application DC/19/01401/OUT(re-consultation) – Land south of Fitzgerald Road, Bramford: Archaeology

Attachments: Planning Application DC/19/01401/OUT – Land south of Fitzgerald Road, Bramford: Archaeology ; SCCAS (RA)_Land south of Fitzgerald Road, Bramford_2019_01401.pdf

Dear Jack,

We have received a re-consultation for this site and it does not affect our previous advice (attached).

Regards,

Gemma

Gemma Stewart
Senior Archaeological Officer

Suffolk County Council Archaeological Service
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk IP32 7AY

Telephone: 01284 741242
Mobile: 07734978011
Email: gemma.stewart@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>

****Please note that I am out of the office from 17th January 2020 and return 18th February 2020****

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

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

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

Our Ref: 2019_01401
Date: 29th March 2019

For the Attention of Jo Hobbs

Dear Mr Isbell

**Planning Application DC/19/01401/OUT – Land south of Fitzgerald Road, Bramford:
Archaeology**

The proposed development site is situated in an area of known archaeology recorded on the County Historic Environment Record and on south facing slope overlooking the River Gipping, which is a topographically favourable location for archaeological activity from all periods. Within the site itself, extensive multi-period finds scatters have been recorded (BRF 037, 041, 054, 061, 107, 109, 146). The site is also flanked on the west by a Roman road (BRF 023). Geophysical survey and trial trenches evaluation within the site has defined two enclosures containing evidence of occupation from the late Saxon to medieval periods, with two Bronze Age cremations also recorded. As a result, there is high potential for the discovery of additional below-ground heritage assets of archaeological importance within the proposed development area, and groundworks associated with the development will damage or destroy archaeological remains which are known to exist within this site.

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

In this case the following two conditions would be appropriate:

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

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

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

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

REASON:

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

INFORMATIVE:

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological excavation will be required before any groundworks commence.

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

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

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

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/F216255
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 03/04/2019

Dear Sirs

Land south of Fitzgerald Road, Bramford, Ipswich IP8 4AB

Planning Application No: DC/19/01401/OUT

**Hydrants are required for this development
(see our required conditions)**

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Sprinklers Advised

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

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

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: paul.sutton@struttandparker.com

Enc: Sprinkler information

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

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

Your Ref:
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 3 April 2019

Planning Ref: DC/19/01401/OUT

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING

ADDRESS: Land south of Fitzgerald road, Bramford, Ipswich IP8 4AB

DESCRIPTION: 175 dwellings

HYDRANTS REQUIRED

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

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

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen
Water Officer

Your ref: DC/19/01401
Our ref: Bramford – land to the south of Fitzgerald Road 56102
Date: 10 January 2020
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Jack,

Bramford: land to the south of Fitzgerald Road – developer contributions

I refer to the proposal: outline planning application (some matters reserved) – residential development of up to 115 dwellings and access, including open space and landscaping (duplicate application).

Reason(s) for re-consultation: documents received 10 December 2019.

This letter updates and replaces the previous consultation response letter dated 26 March 2019.

Summary of infrastructure requirements split between CIL/S106:

CIL	Education	
	- Primary school expansion	£464,688
	- Secondary school expansion	£454,760
	- Sixth form expansion	£90,952
CIL	Libraries improvement	£24,840
CIL	Waste infrastructure	£12,650
S106	Early years	
	- New early years build cost	£215,721
S106	Highways	Tbc

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 council 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, apart from the s106 early years contribution, 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*' [November 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 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 115 dwellings, namely:

- a) Primary school age range, 5 – 11: 28 pupils. Cost per place is £16,596 (2019/20 costs).

- b) Secondary school age range, 11 – 16: 20 pupils. Cost per place is £22,738 (2019/20 costs).
- c) Secondary school age range, ages 16+: 4 pupils. Costs per place is £22,738 (2019/20 costs).

The local schools are Bramford CEVC Primary School (catchment school and within walking distance from the proposed development), Claydon High School (catchment school but only the 2nd nearest from the proposed development) and One (sixth form). Westbourne Academy is the nearest secondary school, within 2-miles to the proposed development.

The strategy is to expand the primary school at Bramford up to 315 places, but the site is large enough to expand up to 420 places if required. Claydon High School can expand on its existing site up to 900 places.

Based on existing forecasts SCC will have no surplus places available at the local primary and secondary schools. For primary school provision a future minimum CIL funding bid of at least £464,688 (2019/20 costs) will be made to Mid Suffolk District Council and for secondary school provision a future minimum CIL funding bid of at least £545,712 (2019/20 costs) will be made.

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

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

In respect of early years requirements, the county council refers to the DfE publication '*Statutory framework for the early years foundation stage: Setting the standards for learning, development and care for children from birth to five*' (3 March 2017). This framework is mandatory for all early years providers in England (from 3 April 2017): maintained schools; non-maintained schools; independent schools; all providers on the Early Years Register; and all providers registered with an early years childminder agency.

The recently published guidance from the DfE 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*”. The new build cost per pupil place is £19,611 (2019/20 costs).

From these development proposals SCC would anticipate up to 17 pre-school children arising which equates to 11 FTE places (one place is 30 hours per week).

This proposed development is in the Bramford & Blakenham ward, where there is an existing deficit of places. The agreed strategy is to deliver a new pre-school setting on the site in Bramford to the east of The Street and Lorraine Way under Mid Suffolk planning reference DC/18/00233. Planning permission has been granted for this scheme with an associated planning obligation dated 08 July 2019 which includes an obligation for the transfer of land for a new pre-school setting.

The proportionate section 106 contribution from this proposed development is calculated as follows:

Early years setting build costs

- £19,611 per child for new build early years setting.
- Total contribution sought is 11 children x £19,611 per place = £215,721 (2019/20 costs).
- The contribution to be increased in line with the BCIS index.

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

- a) Build cost contribution (BCIS indexed) of £215,721 (2019/20 costs) to be payable in full prior to first occupation of the first dwelling. To be secured by way of a planning obligation.
 - b) The developer contribution will be secured for a period of 10 years from completion of the development. To be used for new early years provision serving the Development.
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 the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via

Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

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 2019).

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. £24,840, 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.

Contributions of £110 per household from any significant development in this area would be requested for new, improved or enhanced household waste recycling

facilities – in this case a CIL contribution in the region of £12,650 would be applicable.

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

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

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

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

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

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

9. **Ecology, landscape & heritage.** These are matters for 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 £412 for each trigger point in a planning obligation, payable upon commencement.

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

Apart from the site-specific s106 early years 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 (education)
 Sam Harvey, Suffolk County Council (highways)
 Floods Planning, Suffolk County Council

Your ref: DC/19/01401
Our ref: Bramford – land to the south of Fitzgerald Road 00056102
Date: 26 March 2019
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mrs Jo Hobbs,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Jo,

Bramford: land to the south of Fitzgerald Road – developer contributions

I refer to the proposal: outline planning application (some matters reserved) – residential development of up to 175 dwellings and access, including open space and landscaping.

Ideally, the County Council would like to see a plan-led approach to housing growth in the locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including highway impacts and school provision.

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District's planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

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

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

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

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

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

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

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

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

The Joint Local Plan proposals include:

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

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

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

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

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

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

Community Infrastructure Levy

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

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

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

The details of the impact on local infrastructure serving the development is set out below and, apart from the s106 early years contribution, 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;'

SCC anticipates the following **minimum** pupil yields from a development of 175 dwellings, namely:

- a) Primary school age range, 5 – 11: 43 pupils. Cost per place is £12,181 (2018/19 costs).
- b) Secondary school age range, 11 – 16: 31 pupils. Cost per place is £18,355 (2018/19 costs).
- c) Secondary school age range, ages 16+: 6 pupils. Costs per place is £19,907 (2018/19 costs).

The local schools are Bramford CEVC Primary School (catchment school and within walking distance from the proposed development), Claydon High School (catchment school but only the 2nd nearest from the proposed development) and One (sixth form). Westbourne Academy is the nearest secondary school, within 2-miles to the proposed development.

The strategy is to expand the primary school at Bramford up to 315 places, but the site is large enough to expand up to 420 places if required.

Based on existing forecasts SCC will have no surplus places available at the catchment primary and secondary schools. For primary school provision a future minimum CIL funding bid of at least £523,783 (2018/19 costs) will be made to Mid Suffolk District Council and for secondary school provision a future minimum CIL funding bid of at least £688,447 (2018/19 costs) will be made.

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

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

education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

From these development proposals SCC would anticipate up to 27 pre-school children arising which equates to 15 FTE places (one place is 30 hours per week).

This proposed development is in the Bramford & Blakenham ward, where there is an existing deficit of places. The agreed strategy is to deliver a new early years setting on the site in Bramford to the east of The Street and Lorraine Way under Mid Suffolk planning reference DC/18/00233. However, if DC/18/00233 is refused planning permission then a serviced land reservation of 915.2m² will be required within the red line application for land south of Fitzgerald Road to be transferred freehold to SCC for £1 – the precise location to be agreed at the reserved matters stage.

The proportionate section 106 contribution from this proposed development is calculated as follows:

- The build costs of a new 30-place setting are estimated at £525,000 (excluding land), based on recently delivered projects in Suffolk. This is a cost of £17,500 per place. Based on 175 dwellings this gives a contribution of 15 children x £17,500 = £262,500.
- Gross site area of 915.2m² is required for the new setting. Based on a benchmark land value of £100,000 per acre (£247,100 per hectare) gives a total land value of 0.09152 hectares x £247,100 per hectare = £22,615. This equates to a land contribution of £22,615/60 places = £376.91 per place. Land contribution sought from this proposed scheme is 15 places x £376.92 = £11,308.
- Planning obligation – financial contribution of £273,808 for SCC to use towards the delivery of a new early years setting for Bramford.
- If a land reservation is required to be secured within this proposed scheme for a new setting the total financial contribution will be reduced from £262,500 to £245,539 [credit of 45 places x £376.91 per place land contribution = £16,961], plus the freehold transfer of a serviced site of 915.2m² for £1.

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

Paragraph 102 of the NPPF says Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Paragraph 104 says that planning policies should provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).

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

Paragraph 110 says applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Paragraph 111 says that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

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. £37,800, 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 Mid Suffolk District Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals.

- 10. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic

fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.

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

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

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

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

Apart from the site-specific s106 early years 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

From: David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>
Sent: 29 January 2020 09:54
To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: RE: DC/19/01649 and DC/19/01401 - Land to the South of Fitzgerald Road Bramford

I have no further comments to make on this application.

Regards

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

BMSDC Planning Area Team Green

From: BMSDC Public Realm Consultation Mailbox
Sent: 16 January 2020 14:39
To: BMSDC Planning Area Team Green
Subject: RE: MSDC Planning Re-consultation Request - DC/19/01401

The Public Realm Team support the level of public open space and play provision as indicated on the plans for this development. We would welcome the opportunity to be consulted about the specific play provision within the LEAP at a later date to enable a robust and varied play area to be achieved.

The District Council would not seek to adopt this area on completion and would require a local solution to be achieved for future management of the open spaces and play area

Dave Hughes
Public Realm Officer

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

From: planninggreen@baberghmidsuffolk.gov.uk <planninggreen@baberghmidsuffolk.gov.uk>
Sent: 08 January 2020 08:07
To: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>
Subject: MSDC Planning Re-consultation Request - DC/19/01401

Please find attached planning re-consultation request letter relating to planning application - DC/19/01401 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>
Sent: 11 April 2019 15:18
To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/19/01649

At this stage detailed comments on open space provision cannot be made based on the information provided in this outline application, however the public team support the amount and layout of the open space provision submitted. More detailed comments will be made at reserved matters.

Peter Garrett
Corporate Manager for Countryside and Public Realm Babergh and Mid Suffolk District Councils -
Working Together
t: 01449 724944
m: 07860595369
e: peter.garrett@baberghmidsuffolk.gov.uk
w: www.babergh.gov.uk or www.midsuffolk.gov.uk

Consultee Comments for Planning Application DC/19/01401

Application Summary

Application Number: DC/19/01401

Address: Land To The South Of Fitzgerald Road Bramford Suffolk

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping.

Case Officer: Jack Wilkinson

Consultee Details

Name: Mr Tony Bass

Address: Endeavour House, Ipswich IP1 2BX

Email: tony.bass@baberghmidsuffolk.gov.uk

On Behalf Of: Communities (Major Development)

Comments

I concur with the Public Realm response 16/1/20

From: Tony Bass <Tony.Bass@aberghmidsuffolk.gov.uk>
Sent: 07 May 2019 15:34
To: Georgia Tarbuck <Georgia.Tarbuck@aberghmidsuffolk.gov.uk>
Cc: Peter Garrett <Peter.Garrett@aberghmidsuffolk.gov.uk>
Subject: RE: DC/19/01401 Land To The South Of Fitzgerald Road Bramford

Georgia,

Below relates to applications DC/19/01649 and 01401.

To add to the comments by the Public Realm Team - the site provides an element of open space/play provision which on the face of it has adequate amount of land for this size of development. Bearing in mind the location of the village's main recreation/sports ground (at the opposite end of the village), the provision of some equipped play (LEAP) is welcomed.

The District Council would not be seeking to take on this site and the subsequent maintenance, but would request that the PC are approached for their views on this.

Thanks

Tony

From: Georgia Tarbuck <Georgia.Tarbuck@aberghmidsuffolk.gov.uk>
Sent: 15 April 2019 12:15
To: Tony Bass <Tony.Bass@aberghmidsuffolk.gov.uk>
Subject: DC/19/01401 Land To The South Of Fitzgerald Road Bramford

Good Morning

Our records show that we have not received your comments, if you would like to comment please respond at your earliest convenience

Many thanks for your assistance in this matter.

Kindest Regards

Georgia Tarbuck
Customer Service Team
Planning Support Officer

Babergh and Mid Suffolk District Councils - Working Together

Thank you for your email.

We aim to respond to your email as quickly as possible, however a full response to more complex enquiries may take up to 10 working days, in line with the councils service standards.

Alternatively you may find the answer to your enquiry on our websites:

Email: planning@aberghmidsuffolk.gov.uk

Websites: www.abergh.gov.uk www.midsuffolk.gov.uk

Free advice can be found on the planning portal, please see link below:

www.planningportal.co.uk

The Customer Service Team
Endeavor House,
8 Russell Road,
Ipswich,
IP1 2BX

Please be advised we have two customer access points:

Stowmarket – 54 Ipswich Street, Stowmarket. IP14 1AD

Monday - Thursday, from 9.00am - 5.00pm, or Friday, from 9.00am - 4.30pm

Sudbury Town Hall - Old Market Place, Sudbury, CO10 1TL
Monday - Thursday, from 9.00am - 12.30pm and from 1.30pm - 5.00pm,
or Friday, from 9.00am - 12.30pm and from 1.30pm - 4.30pm.

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jack Wilkinson/Jo Hobbs – Planning – Green Team

From: Sacha Tiller - Housing Enabling Officer – Strategic Housing Team

Date: 28th January 2020

Application Ref: DC/19/01649 (Duplicate: DC/19/01401)

Proposal: Outline Planning Application (some matters reserved) – Residential development of up to 115 dwellings and access, including open space and landscaping. (DUPLICATE APPLICATION)

Location: Land to The South Of, Fitzgerald Road, Bramford, Suffolk.

Key Points

1. Background Information

An outline development proposal (some reserved matters) for up to 115 residential dwellings.

This is an open market development and based on 115 units should offer 40 affordable housing units = 35% policy compliant position.

2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for **127 new affordable homes per annum.**

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

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

3	16%
---	-----

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

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

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

2.6 The Council's Choice Based Lettings system currently has circa. 690 applicants registered for affordable housing in Mid Suffolk as at September 2019

3.1. Preferred Mix for Open Market homes = 75 dwellings

The table below sets out the recommendations for new owner-occupied dwellings for the next 18 years up to 2036.

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 or + bedrooms	12,208	14,303	2,096	29.2%
Total	32,502	39,688	7,186	100.0%

3.2 Proposed Mix for Open Market homes = 75 dwellings

5 x 2 bed terraced/semi-detached two-storey dwellings

2 x 2 bed 'Flats over Garages' –

7 dwellings in total equates to 9.3% 2 bed homes compared to 34.4% in the SHMA report.

7 x 3 bed terraced/semi-detached two-storey dwellings

11 x 3 bed semi-detached/detached two-storey dwellings

9 x 3 bed terraced/semi-detached two-and-a-half-storey dwellings

5 x 3 bed terraced/semi-detached three-storey dwellings

32 dwellings equates to 42.6% 3 bed homes compared to 29.3% as set out in the above table from the 2019 SHMA.

17 x 4 bed terraced/semi-detached two-storey dwellings

19 x 4 bed detached two-storey dwellings

36 dwellings equates to 48% 4 bed houses compared to the 29.2% set out in the 2019 SHMA above.

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

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

3.5 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.
- Although this is not their first preference, many accept that the private rented sector is their most realistic option.
- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move. According to the 2011 Census Bramford already has a significant stock of 3 and 4 bedroom houses. It would have been beneficial to have a good proportion of 2 bedroom houses as starter homes and 2 bedroom bungalows for older people to downsize to.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.
- The SHMA recommendations in section 2.4 demonstrates that we require less 3 to 5 bedroom dwellings than are proposed on this scheme and for the scheme to provide some 2 bedroom bungalows and smaller houses.

- The affordable housing should be integrated into the scheme and not placed in one area.

4. Preferred mix for Affordable Housing

4.1 This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the 690 applicants registered is the important number.

4.2 The housing register shows a district wide need by bedroom size as follows:

1 bed - 369
2 bed - 255
3 bed - 84
4 bed - 15
5 bed – 1

4.3 The NP states that homes should be for local connection in the first instance therefore as this has significant weight, we need to have regard to this and reflect this is the housing mix.

4.4 The majority district wide need is for 1 and 2 bedrooms followed by 3 beds with a much smaller need for 4+ beds. Currently on the housing Gateway housing register we have a high demand for 1 and then 2 bedroom bungalows, flats or houses.

4.5 In line with current local policy, affordable rented and shared ownership units are the preferred affordable housing options to meet the affordable housing needs in the district.

4.6 The current Gateway to Homechoice database indicates a local need of 1 and 2 bedroom flats, houses and bungalows and some 3 bedroom properties.

Proposed mix for affordable housing (affordable rent/shared ownership) = 40 dwellings

8 x 1-bed, 2 person two-storey apartments;
3 x 2-bed, 3 person 'Flats over Garages';
17 x 2-bed, 4 person terraced/semi-detached two-storey dwellings;
12 x 3-bed, 5 person terraced/semi-detached two-storey dwellings;

4.7 We cannot accept flats over garages for affordable rent or shared ownership as they will not be accepted by an RP.

4.8 Please also note that any flats/apartments/dwellings for affordable rent or shared ownership need to be in separate blocks and capable of freehold transfer to an RP. The flatted blocks must provide bicycle storage and bin store areas.

Preferred mix for Affordable Housing = 40 dwellings

Affordable Rent: Total: 30

12 x 3b 5 person Semi-detached/Terraced houses @ 93sqm – NDSS compliant

17 x 2b 4 person Semi-detached/Terraced houses@ 79sqm – NDSS compliant

3 x 2b 4 person Flat over garage – 70sqm – NDSS complaint

8 x 1b 2 person Apartments – 50sqm – NDSS complaint

Shared Ownership: Total 10

4 x 3b 5p houses @ 93sqm – NDSS compliant

6 x 2b 4 person houses @79sqm – NDSS compliant

5. Other requirements for affordable homes:

- Properties must be built to the Housing Standards Technical guidance March 2015 and Nationally Described Space Standards.
- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 75% of relets in perpetuity.
- For all shared ownership dwellings applicants must be registered with the Suffolk Homebuy agency.
- Initial share purchases for shared ownership dwellings to be capped at 70%.
- The affordable units to be constructed ‘tenure blind’ and must not be in clusters of more than 15 dwellings. The affordable homes should be distributed across the different phases of the development.
- All flats must be in separate blocks in blocks of no more than 6 units.
- Adequate parking provision is made for the affordable housing units and cycle storage/sheds.
- Standard trigger points for the delivery of the affordable housing – this will then be included automatically in the instruction from planning to shared legal services that it needs to be in the S106 agreement as a matter of course.
 - (a) not Occupy or permit Occupation of more than fifty per cent (50%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (50%) of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider; and
 - (b) not Occupy or permit Occupation of more than eighty per cent (80%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until all of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider.

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jo Hobbs – Planning Officer

From: Sacha Tiller - Housing Enabling Officer – Strategic Planning

Date: 23rd April 2019

Application Ref: DC/19/01649 – DC/19/01401

Proposal: Outline Planning Application (some matters reserved) – Residential development of up to 175 dwellings and access, including open space and landscaping.

Location: Land To The South Of, Fitzgerald Road, Bramford, Suffolk.

Key Points

1. Background Information

An outline development proposal (some reserved matters) for 175 residential dwellings.

This is an open market development and based on 175 units should offer 61 affordable housing units = 35% policy compliant position.

2. Housing Need Information:

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

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

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

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

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

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

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

2.6 The Council's Choice Based Lettings system currently has circa. 724 applicants registered for affordable housing in Mid Suffolk as at March 2019

3. Preferred Mix for Open Market homes.

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

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

3.3 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.
- Although this is not their first preference, many accept that the private rented sector is their most realistic option.

- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move. The current proposal includes 4 x 2bh, 12 x 3bh, 16 x 4bh and 4 x 5bh, half of which are detached dwellings. According to the 2011 Census Stonham Aspall already has a significant stock of 3 and 4 bedroom houses. It would have been beneficial to have included more 2 x 2 bedroom houses as starter homes and 2 x 2 bedroom bungalows for older people to downsize to.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.
- The SHMA recommendations in section 2.4 demonstrates that we require less 4/5 bedroom dwellings than are proposed on this scheme and for the scheme to provide more 2 bedroom bungalows and houses.
- The affordable housing should be integrated into the scheme and not placed in one area.

4. Preferred mix for Affordable Housing

4.1 This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the 724 applicants registered is the important number.

4.2 The housing register shows a district wide need by bedroom size as follows:

1 bed - 369
 2 bed - 255
 3 bed - 84
 4 bed - 15
 5 bed – 1

4.2 The NP states that homes should be for local connection in the first instance therefore as this has significant weight we need to have regard to this and reflect this is the housing mix.

4.2 The majority district wide need is for 1 and 2 bedrooms followed by 3 beds with a much smaller need for 4+ beds. Currently on the housing Gateway housing register we have a high demand for 1 and then 2 bedroom bungalows, flats or houses.

4.3 In line with current local policy, affordable rented and shared ownership units are the preferred affordable housing options to meet the affordable housing needs in the district.

4.4 The current Gateway to Homechoice database indicates a local need of 1 and 2 bedroom flats, houses and bungalows and some 3 bedroom properties.

4.5 The following affordable housing mix is recommended:

Affordable Rent: Total: 45

- 4 x 1bed 2persons flats @ 50sqm
- 4 x 2bed 4persons flats @ 70sqm
- 18 x 2bed 4persons bed houses @ 79sqm
- 11 x 3bed 5persons bed houses 93sqm
- 8 x 2bed 4 persons bungalows 70sqm

Shared Ownership: Total: 15

- 8 x 2bed x 4person houses @ 79sqm
- 7 x 3bed x 5person houses @ 93sqm

5. Other requirements for affordable homes:

- Properties must be built to the Housing Standards Technical guidance March 2015 and Nationally Described Space Standards.
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MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

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From: Sacha Tiller - Housing Enabling Officer – Strategic Planning

Date: 23rd April 2019

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BMSDC Planning Area Team Green

Subject: DC/19/01401 and DC/19/01649 Land to the South of Fitzgerald Road, Bramford

From: Karolien Yperman <Karolien.Yperman@aberghmidsuffolk.gov.uk>

Sent: 20 January 2020 15:31

To: Jack Wilkinson <Jack.Wilkinson@aberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>

Subject: FW: DC/19/01401 and DC/19/01649 Land to the South of Fitzgerald Road, Bramford

Hi Jack,

I re-examined the additional documents that were submitted on the 10th and 13th of December 2019, and I have no further comments to make at this point. My most recent comments (from 3rd of January, copied below) still stand.

Kind regards,
Karolien

Karolien Yperman BA(Hons) MA
Heritage and Design Officer
Babergh and Mid Suffolk District Councils – Working Together

T: 01449 724820

T: 07850 883258

E: karolien.yperman@aberghmidsuffolk.gov.uk

E: heritage@aberghmidsuffolk.gov.uk

www.abergh.gov.uk & www.midsuffolk.gov.uk



From: Karolien Yperman

Sent: 03 January 2020 16:30

To: Jack Wilkinson <Jack.Wilkinson@aberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>

Subject: DC/19/01401 and DC/19/01649 Land to the South of Fitzgerald Road, Bramford

Hi Jack,

The Heritage Team previously identified the potential for a low level of less than substantial harm to the significance of Runcoton House (Grade II), Street Farm Cottage (Grade II) and the Church of St Mary (Grade I). The proposed development has now been amended, with a reduction of 60 dwellings. Although the layout of the proposed development is not a reserved matter at this point, the indicative master plan shows that this could leave the southern section of the site undeveloped.

The layout as shown on the indicative master plan would reduce the negative impact of the proposed development on the setting, and therefore the significance, of Runcoton House. Leaving the southern section of the site

undeveloped would leave the listed building set apart from existing development and better preserve its rural setting. The potential impact on Street Farm Cottage and the Church of St Mary remains unchanged.

The amendments have therefore reduced the potential level of harm to Runcton House to none-negligible, however the potential level of harm to Street Farm Cottage and the Church is still considered to be a low level of less than substantial harm. The full extent of the harm would still depend on layout, distribution of building types and building heights, design, boundary treatment, etc.

Kind regards,
Karolien

Karolien Yperman BA(Hons) MA
Heritage and Design Officer
Babergh and Mid Suffolk District Councils – Working Together

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From: Karolien Yperman <Karolien.Yperman@aberghmidsuffolk.gov.uk>
Sent: 03 January 2020 16:30
To: Jack Wilkinson <Jack.Wilkinson@aberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Subject: DC/19/01401 and DC/19/01649 Land to the South of Fitzgerald Road, Bramford

Hi Jack,

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The layout as shown on the indicative master plan would reduce the negative impact of the proposed development on the setting, and therefore the significance, of Runcton House. Leaving the southern section of the site undeveloped would leave the listed building set apart from existing development and better preserve its rural setting. The potential impact on Street Farm Cottage and the Church of St Mary remains unchanged.

The amendments have therefore reduced the potential level of harm to Runcton House to none-negligible, however the potential level of harm to Street Farm Cottage and the Church is still considered to be a low level of less than substantial harm. The full extent of the harm would still depend on layout, distribution of building types and building heights, design, boundary treatment, etc.

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Babergh and Mid Suffolk District Councils – Working Together

T: 01449 724820
T: 07850 883258
E: [karolien.yperman@aberghmidsuffolk.gov.uk](mailto:karylenn.yperman@aberghmidsuffolk.gov.uk)
E: heritage@aberghmidsuffolk.gov.uk
www.abergh.gov.uk & www.midsuffolk.gov.uk



Consultation Response Pro forma

1	Application Number	DC/19/01401 and DC/19/01649 Land to the South of Fitzgerald Road, Bramford						
2	Date of Response	24/04/19						
3	Responding Officer	<table border="1"> <tr> <td>Name:</td> <td>Karolien Yperman</td> </tr> <tr> <td>Job Title:</td> <td>Heritage and Design Officer</td> </tr> <tr> <td>Responding on behalf of...</td> <td>Heritage Team</td> </tr> </table>	Name:	Karolien Yperman	Job Title:	Heritage and Design Officer	Responding on behalf of...	Heritage Team
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 information submitted with this outline application, the Heritage Team considers that any development on this site has the potential to cause a low level of less than substantial harm to the significance of the nearby listed buildings, Street Farm Cottage, Runcton House and the Church of St Mary the Virgin.</p> <p>There is the potential to minimise this harm through careful consideration of layout, distribution of building types and building heights, design, boundary treatment, etc.</p>						
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The application site for up to 175 dwellings lies adjacent to the Grade II listed Street Farm Cottage and Runcton House and is within the wider setting of the Grade I listed Church of St Mary and the Grade II listed Thornbush Hall. The heritage concern relates to the impact of the proposed development on the settings of these listed buildings, which contribute to their significance.</p> <p>Runcton House is located at the south-western corner of the application site, Street Farm Cottage is located at the north-eastern corner of the site, and the Church is further to the north-east. Thornbush Hall is located some distance to the west of Runcton House.</p> <p>Runcton House is a part-C15, part-C19 farmhouse. The C19 red brick wing was built with its western gable fronting the road, and it therefore occupies a prominent position on Loraine Way, visually dominant when travelling towards Sproxton. The undeveloped nature of the application site highlights this position and preserves the historic isolated setting of the Runcton farmstead.</p> <p>Street Farm Cottage is a late-C16 timber-framed former farmhouse, according to the listing description likely only part of an originally larger farmhouse. It faces east, toward Vicarage Close. Its residential curtilage appears</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.

to have grown since the mid-C20, as according to historic OS maps it used to be more contained. Street Farm Cottage stood separated from the core of Bramford with a few other buildings, and likely had a view of the Church, until Bramford expanded outward in the 1950s-70s. Currently the application site is a remnant of its rural setting and a direct connection to the countryside.

The Church of St Mary stands at the edge of Bramford next to the River Gipping. The spire of the Church can be observed from Loraine Way and from the public footpaths on the site, above the treeline that borders Street Farm Cottage and Vicarage Close. As a point of reference in the countryside, the Church would have occupied a more prominent position before the growth of the Bramford settlement in the mid-C20. However, the open nature of the application site still makes a positive contribution to the appreciation of the Church spire when travelling on Loraine Way.

Thornbush Hall sits to the west of the application site, separated by open agricultural land. Thornbush Hall lies on higher ground than the application site, which makes it an appreciable silhouette among a grouping of trees when looking east from the application site. Thornbush Hall faces south (rather than east as stated in the Heritage Impact Assessment), and while the application site does form part of its wider setting, its contribution to the significance of Thornbush Hall is limited.

Development on this site would reduce the rural setting of Runcton Farm and connect it to the Bramford settlement. The indicative layout shows the development set back from Loraine Way in a wedge that opens up from the corner of Fitzgerald Road toward Runcton Farm. This would preserve Runcton House as the most prominent building on this part of Loraine Way, however the north-western corner of the development could appear intrusive and abrupt in the streetscape. While effort has been made to limit the impact of the proposed development on Runcton House, the Heritage Team would still identify harm in changing the character of the site from open agricultural land to suburban residential land.

Similarly, any development on the site would likely have a negative impact on the setting of Street Farm Cottage, as it would surround the grounds of the listed building with modern development. Street Farm Cottage is no longer an isolated dwelling, however it still maintains a

		<p>connection to the countryside through the application site, which would be severed.</p> <p>The appreciation of the Church spire would be diminished. The Heritage Impact Assessment specifies that medium distance views toward the Church would be preserved from within areas of public open space (and along part of the footpath) inside the site, which could reduce the level of harm caused to the setting of the Church. However, it is unclear at this point how tall the proposed buildings would be and how their rooflines would be articulated, which would affect these views. While no information on the height of the proposed buildings has been submitted, the indicative layout shows a fairly dense arrangement, especially immediately south of Fitzgerald Road. The distribution of building types should be a key consideration.</p> <p>In conclusion, any development in this site would likely cause less than substantial harm to the significance of Runcoton House, Street Farm Cottage and the Church of St Mary, because it would diminish their setting. The level of less than substantial harm would likely be on the lower end of the scale, and would depend on several factors, including the layout, density, distribution of building types and building heights, design, etc. of the proposed 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	<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>
7	Recommended conditions	

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Environmental Health - Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/19/01401

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping.

Location: Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Thank you for your consultation on the above application. I have no further comments to those I made previously. These are as follows:

The application includes an Environmental Noise Assessment (ENA) prepared by SRL Technical Services, report number C14740A/T01/TWR, dated 13/06/2018.

The ENA identifies that noise from road traffic is the dominant noise source at the application site. A noise survey has been carried out at locations representative of proposed housing.

This is summarised below:

The assessment shows:

- The dominant noise source affecting the proposed development is road traffic from the B1113 (Lorraine Way). The dwellings to the north will also be exposed to road traffic noise from Fitzgerald Road. Noise from the A14 (more than 700m to the west) is audible during lulls in road traffic on Lorraine Way and Fitzgerald Road.
- The criteria for indoor ambient noise levels for proposed dwellings facing Lorraine Way and Fitzgerald Road can be met by installing standard thermal double-glazing windows and non-acoustic trickle ventilators. The criteria for indoor ambient noise levels for dwellings which are shielded from the roads can be achieved with open windows. This is subject to the final layout of the scheme.
- Noise levels in external living areas are predicted to be within the recommended criteria.

The Final layout of the scheme should be designed to meet the recommendations in the SRL report to ensure that the internal and external noise levels are within the BS 8233:2014 criterion for both internal ambient noise levels and those for outdoor amenity spaces.

I would suggest that a condition requiring pre-occupation independent testing would be required to ensure that WHO and BS8233 internal values are met.

Finally as the site is in proximity to existing dwellings, it is essential that a Construction Management Plan be in place to minimise loss of amenity arising from construction of the development as follows:.

- No development shall commence until a Construction and Environmental Management Plan (CEMP), to cover both demolition/site clearance and construction phases of the development, has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall be undertaken in accordance with best practice guidelines and BS: 5228:2009 + A1:2014 (and any revisions thereof). The plan shall include details of operating hours, (recommended 0800-1800 Mon-

Fri, 0900-1300 Sat with no working on Sundays or bank holidays) scheduled timing/phasing of development for the overall construction period, means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, location and management of wheel washing facilities, external lighting, location and nature of compounds and storage areas (including maximum storage heights), waste removal, location and nature of temporary buildings and boundary treatments, dust management, noise management (both in terms of workers and local

residents, and to include noise limit at the nearest sensitive residential property, or agreed representative accessible monitoring point) and waste/litter management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Note: the Construction Management Plan shall be submitted in phases for each phase of construction so as to take account of protection measures for both newly constructed (and occupier) dwellings as well as those dwellings which existed prior to commencement/

- No burning shall take place on site during the site clearance/demolition or construction phases of the development.

Andy

Andy Rutson-Edwards, MCIEH AMIOA

Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

Email andy.rutson-edwards@baberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

From: Andy Rutson-Edwards <Andy.Rutson-Edwards@aberghmidsuffolk.gov.uk>
Sent: 27 March 2019 12:46
To: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Cc: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Subject: DC/19/01401

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/19/01401 Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping. Location: Land To The South Of, Fitzgerald Road, Bramford, Suffolk

We Thank you for your consultation on the above application.

The application includes an Environmental Noise Assessment (ENA) prepared by SRL Technical Services, report number C14740A/T01/TWR, dated 13/06/2018.

The ENA identifies that noise from road traffic is the dominant noise source at the application site. A noise survey has been carried out at locations representative of proposed housing.

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Andy

Andy Rutson-Edwards, MCIEH AMIOA
Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

Email andy.rutson-edwards@aberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

BMSDC Planning Area Team Yellow

From: Nathan Pittam
Sent: 14 January 2020 12:57
To: Jack Wilkinson
Cc: BMSDC Planning Area Team Yellow
Subject: DC/19/01401. Land Contamination:

Dear Jack

EP Reference : 271296

DC/19/01401. Land Contamination:

Land To The South Of, Fitzgerald Road, Bramford, IPSWICH, Suffolk.

Re-consultation: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise 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@aberghmidsuffolk.gov.uk
Work: 07769 566988 / 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk



Minimum requirements for dealing with unexpected ground conditions being encountered during construction.

1. All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.
2. A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.
3. The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.
4. The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.
5. The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.
6. Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.
7. Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.
8. Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.
9. Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.
10. A photographic record will be made of relevant observations.
11. The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be:
 - re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or
 - treatment of material on site to meet compliance targets so it can be re-used; or
 - removal from site to a suitably licensed landfill or permitted treatment facility.
12. A Verification Report will be produced for the work.

From: Nathan Pittam <Nathan.Pittam@aberghmidsuffolk.gov.uk>
Sent: 13 May 2019 09:51
To: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Subject: DC/19/01401. Land Contamination

Dear Jo,

EP Reference : 257334

DC/19/01401. Land Contamination

Land To The South Of, Fitzgerald Road, Bramford, IPSWICH, Suffolk.

Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Many thanks for your request for comments in relation to the above application in light of the newly submitted Geoenvironmental Assessment. Having reviewed the application in full I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise 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@aberghmidsuffolk.gov.uk

Work: 07769 566988 / 01449 724715

Websites: www.abergh.gov.uk www.midsuffolk.gov.uk



Minimum requirements for dealing with unexpected ground conditions being encountered during construction.

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be:* • *re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or* • *treatment of material on site to meet compliance targets so it can be re-used; or* • *removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

From: Nathan Pittam
Sent: 01 April 2019 08:50
To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>
Subject: DC/19/01401. Land Contamination

Dear Jo,

EP Reference : 257334

DC/19/01401. Land Contamination

Land To The South Of, Fitzgerald Road, Bramford, IPSWICH, Suffolk.

Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Many thanks for your request for comments in relation to the above development from the perspective of land contamination. Having reviewed the application I note that the applicant has failed to submit the required information to demonstrate that the site is suitable for the proposed end use. For a development of this size we require that the applicant submits a Phase I desk study that complies with BS 10175: 2011+A1:2013 “Investigation of potentially contaminated sites - Code of practice and CLR11 “Model procedures for the management of land contamination”. The simplified Envirocheck-type report and Land Contamination Questionnaire is not considered appropriate for a development of this scale. This report should comprise of an overview of previous uses of the site as well as current site conditions as demonstrated through a site walkover and an assessment of risk by a technically competent person. Please see our advice note which will provide further information <https://www.babergh.gov.uk/assets/Environment/Advice-Note-1.pdf> which will hopefully provide sufficient clarity to enable the applicant to get their application to a point where a reconsultation is possible.

Should the applicant wish to source the appropriate documents to support their application then we may be in a position to review our recommendation but we would require formal notification of newly submitted information quoting the above EP Reference number. It should be noted that any documentation submitted in relation to a planning application should be sent directly to the Development Management Team and not the Environmental Protection Team as this may lead to delays in the planning process.

For details regarding how Babergh and Mid Suffolk District Councils approaches Land Contamination, including templates for planning submissions, please view our website at <https://www.babergh.gov.uk/environment/contaminated-land/>.

Kind regards

Nathan

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Senior Environmental Management Officer

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From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 01 April 2019 08:50
To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>
Subject: DC/19/01401. Land Contamination

Dear Jo,

EP Reference : 257334

DC/19/01401. Land Contamination

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Nathan

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websites: www.babergh.gov.uk www.midsuffolk.gov.uk



MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jo Hobbs, Development Control Team

FROM: Jennifer Lockington, Environmental Protection Team

DATE: 03.05.2019

YOUR REF: 19/01401

OUR REF: 258762

SUBJECT: Land To The South Of Fitzgerald Road Bramford Suffolk
Outline Planning Application (some matters reserved) - Residential development of up to 175 dwellings and access, including open space and landscaping.

Please find below my comments regarding 'Environmental Health – Air quality' only.

Thank you for your consultation.

I have referred to the Environmental Protection UK (EPUK) Guidance, 2017 – Land Use Planning and Development Control: Planning for Air Quality, in assessing this application with regard to air quality. This document sets out criteria that indicate whether an air quality assessment is required in order to assess the impact that a proposed development would have on occupiers of existing residential premises. One of the criteria is if the proposal would cause a change in Light Duty Vehicle traffic flows of more than 500 Annual Average Daily Traffic (AADT).

Based on the predicted traffic flows from this development during the two peak hours that have been stated in the Transport Assessment (by Canham Consulting), it is possible that the 500 AADT flow would be exceeded. I therefore recommend that an air quality assessment is conducted, or that a justification is provided as to why this is not necessary. The EPUK Guidance (particularly paragraph 6.9) provides further details on the nature of an air quality assessment.

Without an air quality assessment, (or information explaining why this is not necessary), it is not possible to determine whether this development would have a detrimental impact on the occupiers of nearby residential premises. I would therefore recommend refusal of the application until the above information has been provided.

Kind regards

Jennifer Lockington
Environmental Protection Officer

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jack Wilkinson, Development Management Team

FROM: Jennifer Lockington, Environmental Protection Team

DATE: 31.12.2019

YOUR REF: 19/01401

OUR REF: 270344

SUBJECT: Land To The South Of Fitzgerald Road Bramford Suffolk
Outline Planning Application (some matters reserved) - Residential development of up to 175 dwellings and access, including open space and landscaping.

Please find below my comments regarding 'Environmental Health – Air quality' only.

Thank you for your re-consultation following submission of an air quality assessment.

I acknowledge the report by SRL, 30 August 2019, Detailed Air Quality Assessment, and am satisfied with the methodology used. The report concludes that there will be a negligible air quality impact from traffic from the development on existing and new receptors and the Lorraine Way/Fitzgerald Road junction. The three key traffic pollutants – NO₂, PM₁₀ and PM_{2.5} have been assessed. No mitigation is required with regard to traffic from an air quality perspective.

With regard to the risk from the construction works, emissions of dust and Particulate Matter have been assessed. There is a high to medium risk for dust soiling, and a low risk for human health effects. Therefore, mitigation measures are recommended. These are detailed in Appendix G and are acceptable measures. You may wish to impose a planning condition requiring that these measures are undertaken, or may wish to incorporate them into the Construction Management Plan that my colleague has requested is agreed by a planning condition. I would though recommend that the proposed mitigation measures are required by some means in order to reduce dust soiling and protect human health.

Kind regards

Jennifer Lockington
Environmental Protection Officer

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Jo Hobbs, Development Control Team

FROM: Jennifer Lockington, Environmental Protection Team

DATE: 03.05.2019

YOUR REF: 19/01401

OUR REF: 258762

SUBJECT: Land To The South Of Fitzgerald Road Bramford Suffolk
Outline Planning Application (some matters reserved) - Residential development of up to 175 dwellings and access, including open space and landscaping.

Please find below my comments regarding 'Environmental Health – Air quality' only.

Thank you for your consultation.

I have referred to the Environmental Protection UK (EPUK) Guidance, 2017 – Land Use Planning and Development Control: Planning for Air Quality, in assessing this application with regard to air quality. This document sets out criteria that indicate whether an air quality assessment is required in order to assess the impact that a proposed development would have on occupiers of existing residential premises. One of the criteria is if the proposal would cause a change in Light Duty Vehicle traffic flows of more than 500 Annual Average Daily Traffic (AADT).

Based on the predicted traffic flows from this development during the two peak hours that have been stated in the Transport Assessment (by Canham Consulting), it is possible that the 500 AADT flow would be exceeded. I therefore recommend that an air quality assessment is conducted, or that a justification is provided as to why this is not necessary. The EPUK Guidance (particularly paragraph 6.9) provides further details on the nature of an air quality assessment.

Without an air quality assessment, (or information explaining why this is not necessary), it is not possible to determine whether this development would have a detrimental impact on the occupiers of nearby residential premises. I would therefore recommend refusal of the application until the above information has been provided.

Kind regards

Jennifer Lockington
Environmental Protection Officer

BMSDC Planning Area Team Green

Subject: DC/19/01401

From: Peter Chisnall <Peter.Chisnall@aberghmidsuffolk.gov.uk>
Sent: 20 January 2020 15:56
To: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Subject: DC/19/01401

Dear Jack,

Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 115 dwellings and access, including open space and landscaping.

Location: Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Reason(s) for re-consultation: Documents received 10th December 2019

Many thanks for your request to comment on the sustainability aspects of this reconsultation.

I have nothing to add to my predecessor, Iain Farquharson's response of 16th April 2019.

Regards,

Peter

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

From: Iain Farquharson <iain.Farquharson@aberghmidsuffolk.gov.uk>
Sent: 16 April 2019 11:31
To: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Subject: 257337: MSDC Planning Consultation Request - DC/19/01401

Dear Sir/Madam

We have reviewed this application and while we note it is for outline permission we are disappointed that there is no mention, consideration or allowance for sustainability features and measures.

For a large application such as this we require some indication even at this early stage what commitments the applicant is willing to make on the topics of sustainability, energy and carbon reduction, water use, renewable and low carbon technologies.

As there is no information on these topics there is nothing upon which we can make an informed decision therefore we must request refusal of permission.

Should permission be granted we request condition(s) are included to ensure the development is a sustainable as possible:

A Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3 SO8 and NPPF para 35) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). Details as to the provision for electric vehicles should also be included. This document shall be submitted to, and approved in writing by, the Local Planning Authority before works extend beyond foundation level.

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

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

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

Guidance can be found at the following locations:

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

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

01449 724878 / 07860 827027

[://iain.farquharson@aberghmidsuffolk.gov.uk](mailto://iain.farquharson@aberghmidsuffolk.gov.uk)

Consultation Response Pro forma

1	Application Number	DC/19/01401						
2	Date of Response	24/01/20						
3	Responding Officer	<table border="1"> <tr> <td>Name:</td> <td>Hannah Bridges</td> </tr> <tr> <td>Job Title:</td> <td>Waste Management Officer</td> </tr> <tr> <td>Responding on behalf of...</td> <td>Waste Services</td> </tr> </table>	Name:	Hannah Bridges	Job Title:	Waste Management Officer	Responding on behalf of...	Waste Services
Name:	Hannah Bridges							
Job Title:	Waste Management Officer							
Responding on behalf of...	Waste Services							
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions						
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.	Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.  OLYMPUS - 8x4MS Wide - Euro 6 - Smo The road surface and construction must be suitable for a 32 tonne RCV to drive on. There are no bin presentation points plotted, these need to be marked on the site plan along with the communal bin stores with the number of flats that it will be servicing. The bin presentation points need to be at the edge of the curtilage. All share private drives would require the bin presentation points to be beside the main service road. Communal bins must have a level threshold and be large enough to easily manoeuvre bins out of the bin store to the RCV which should be a short distance from the bin store, there should be a dropped curb so that the bins are not manhandled over different levels of ground. The current plan suggest that access and service of waste collections would be restricted.						
6	Amendments, Clarification or Additional							

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.

	Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	
7	Recommended conditions	Meet the conditions in the discussion.

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.



Consultation Response Pro forma

1	Application Number	DC/19/01401						
2	Date of Response	03/04/19						
3	Responding Officer	<table border="1"> <tr> <td>Name:</td> <td>Hannah Bridges</td> </tr> <tr> <td>Job Title:</td> <td>Waste Management Officer</td> </tr> <tr> <td>Responding on behalf of...</td> <td>Waste Services</td> </tr> </table>	Name:	Hannah Bridges	Job Title:	Waste Management Officer	Responding on behalf of...	Waste Services
Name:	Hannah Bridges							
Job Title:	Waste Management Officer							
Responding on behalf of...	Waste Services							
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions						
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>Information in relation to the road structure, dimensions and suitability for a 32 tonne refuse collection vehicle (RCV) to include suitable access to the branch drives off the service road required. Proposed detail plan of the wheeled bin presentation points to include any bin storage areas for flats.</p> <p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.</p> <p style="text-align: center;">  OLYMPUS - 8x4MS Wide - Euro 6 - Smo </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							
7	Recommended conditions	Meet the conditions in the discussion.						

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.

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.



Our Ref: 20_02095_P
Your Ref: DC/19/01401

8th January 2020

Dear Sir/Madam

RE: Outline Planning Application (some matters reserved) - Residential development of up to 115 dwellings and access, including open space and landscaping at Land to the South of Fitzgerald Road, Bramford, Suffolk.

The site is near to the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. A copy of the Board's Byelaws can be accessed on our website (https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf). These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB.

In order to avoid conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the following:

- I am pleased to see that initial testing shows that a drainage strategy reliant on infiltration is likely to be achievable on the proposed development. If for any reason a strategy wholly reliant on infiltration does not prove viable and a surface water discharge is proposed to a watercourse within the IDD (directly or indirectly), then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that the required consent is sought prior to determination of the planning application.

Kind Regards,

Ellie

Ellie Roberts
Sustainable Development Officer
Water Management Alliance



Mr R Pipe (Chairman) Mr J Foskett (Vice-Chairman)

Mr P J Camamile (Chief Executive)



Cert No. GB11990

Cert No. GB11991



Kettlewell House
Austin Fields Industrial Estate
King's Lynn
Norfolk
PE30 1PH

t: +44(0)1553 819600
f: +44(0)1553 819639
e: planning@wlma.org.uk
w: www.wlma.org.uk

Our Ref: 19_01365_P
Your Ref: DC/19/01401

1 April 2019

Dear Sir/Madam,

RE: Outline Planning Application (some matters reserved) Residential development of up to 175 dwellings and access, including open space and landscaping at Land to the South of Fitzgerald Road, Bramford, Suffolk.

Please be aware that the site has been screened as being near to the Internal Drainage District (IDD) of the East Suffolk IDB which is a Member Internal Drainage Board (IDB) of the Water Management Alliance. Please see our website (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf) for detailed mapping of each Board's District. In order to avoid conflict between the planning process and the relevant Board's regulatory regime and consenting process please be aware of the following:

We are pleased to see that initial testing shows that a drainage strategy reliant on infiltration is likely to be achievable on the proposed development. If for any reason a strategy wholly reliant on infiltration does not prove viable and a surface water discharge is proposed to a watercourse, then the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy. This policy is available using the following link https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such we strongly recommend that any application to discharge is made to the Board prior to determination of the planning application.

Yours sincerely,

Jessica Nobbs
Flood and Water Officer
Water Management Alliance



Mr R Pipe (Chairman) Mr J Foskett (Vice-Chairman)

Mr P J Camamile (Chief Executive)



Cert No. GB11990

Cert No. GB11991

From: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Sent: 14 April 2020 17:05
To: Julie Havard <Julie.Havard@baberghmidsuffolk.gov.uk>
Subject: RE: Habitats Regulations Assessment - DC/19/01401 & DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Julie,

The correspondence is sufficient to indicated that Natural England have no objection subject to the mitigation being secured within the submitted Habitats Regulations Assessments. I must have missed this when I searched through my emails!

No additional information is therefore required.

Kind regards,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139

email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/hamishjackson/

From: Julie Havard <Julie.Havard@baberghmidsuffolk.gov.uk>
Sent: 14 April 2020 16:59
To: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Cc: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Subject: FW: Habitats Regulations Assessment - DC/19/01401 & DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Hamish,

The last correspondence we had from Natural England was on the 30th Jan – see attached. Are we waiting for an additional comment?

Regards

Julie

From: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>

Sent: 20 January 2020 09:39

To: consultations@naturalengland.org.uk

Cc: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>; Cheese, Kayleigh <kayleigh.cheese@naturalengland.org.uk>

Subject: Habitats Regulations Assessment - DC/19/01401 & DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Dear Sir or Madam,

Please could Natural England provide consultation responses for the attached Habitats Regulations Assessment – Appropriate Assessments, to provide confirmation whether Natural England are in agreement with Mid Suffolk District Councils conclusions contained within the reports.

Kind regards,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139

email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/hamishjackson/

From: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Sent: 17 January 2020 13:08
To: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Subject: FW: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Hamish,

The applicants have agreed with the draft HRA record for both 19/01401 and 19/01649. Would you be able to pass to Natural England now for comment?

Many thanks,

Jo

Jo Hobbs
Principal Planning Officer
Development Management, Sustainable Communities
Babergh District Council and Mid Suffolk District Council
T 01449 724620
M 07749 437470

Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given.

From: Paul Sutton <Paul.Sutton@struttandparker.com>

Sent: 10 January 2020 17:22

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>; Christopher Smith <christopher.smith@hopkinshomes.co.uk>

Subject: RE: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Jo,

Having discussed this with our client, they are happy to agree with the HRA content, including the contribution for recreational disturbance to protected sites.

Kind regards,

Paul

Paul Sutton BTP MRTPI Dip Urban Design IHBC

Director and Head of Cambridge Planning

Strutt & Parker

66-68 Hills Road

Cambridge, CB2 1LA

Direct: 01223 789391 | Mobile: 07585 775741 | Office: 01223 459500

From: Jo Hobbs [mailto:Jo.Hobbs@baberghmidsuffolk.gov.uk]

Sent: 07 January 2020 16:10

To: Paul Sutton <Paul.Sutton@struttandparker.com>; Christopher Smith <christopher.smith@hopkinshomes.co.uk>

Subject: FW: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Dear Paul and Chris,

A happy new year to you both. Following submission of the revised plans for the above scheme in December, our ecologist has responded with a draft Habitats Regulations Assessment for both applications for you to review and agree to, including the contribution for recreational disturbance to protected sites.

If you could confirm you are happy with both we will forward on to Natural England for agreement.

Kind regards,

Jo

Jo Hobbs

Principal Planning Officer

Development Management, Sustainable Communities

Babergh District Council and Mid Suffolk District Council

T 01449 724620

M 07749 437470

Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given.

From: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>

Sent: 03 January 2020 12:07

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

Subject: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Jo

Please also see the attached ecological comments and HRA Appropriate Assessment Record Draft for duplicate application of this development.

As highlighted in my previous email, please can you not upload the Habitats Regulation Assessment until it has been approved by the developer and Natural England.

Kind regards,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139

email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/hamishjackson/

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03 January 2020

Jo Hobbs
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk 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/19/01401
Location: Land To The South Of Fitzgerald Road Bramford Suffolk
Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Dear Jo,

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

No objection subject to:

- a) securing visitor management measures towards the Stour and Orwell Estuaries Special Protection Area and Ramsar, in line with the Suffolk Coast Recreational Avoidance and Mitigation Strategy; and
- b) ecological mitigation and enhancement measures.

We have reassessed the Preliminary Ecological Appraisal, Phase 2 Ecological Surveys and Assessment & Shadow Habitats Regulations Assessment Report (Southern Ecological Solutions Ltd, February 2019), provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority Species/Habitats.

We have also reviewed the further documents submitted in December 2019. This includes a revised Indicative Landscape Masterplan and Design and Access Statement, which indicates the number of residential dwellings has been reduced to 115.

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 Phase 2 Ecological Surveys and Assessment (CSA Ltd, February 2019) should be secured and implemented in full. This is necessary to conserve Protected and Priority Species. In addition, we also have the following comment:

Designated Sites - Habitats Regulations Assessment

We highlight that the site contains residential development which is situated within the Zone of Influence (ZOI) for the Stour and Orwell Estuaries SPA & Ramsar. Therefore, Natural England's consultation response (April 2019 – Ref: 279300) should be followed to avoid Adverse Impacts to Site Integrity to the above Habitats Sites (from the development alone and in combination of other plans and projects) and ensure compliance with the Habitats Regulations 2017. The applicant has therefore provided Information to Support the Habitats Regulations Assessment for this application, to be undertaken by the LPA as the competent authority.

Place Services initially had a holding objection regarding the submitted Shadow Habitats Regulations Assessment to ensure that a 2.7km circular dog walking route was demonstrated within the site and the adjacent PRoW. However, we are now satisfied that sufficient information has been provided to undertake the Habitats Regulations Assessment, considering the revised Indicative Landscape Masterplan and the appropriate Suitable Alternative Natural Green Space (SANGS) provision on site.

Protected Species - Bats & Lighting

A Wildlife Friendly Lighting Scheme should be provided for this application as indicated within the Ecological Impact Assessment, to be secured as a condition of any consent prior to occupation. This should follow [Guidance Note 8 Bats and artificial lighting](#) (The Institute of Lighting Professionals & Bat Conservation Trust, 2018), [Guidelines for consideration of bats in lighting projects](#) (Eurobats Secretariat, 2018) and the recommendations provided within the Phase 2 Ecological Surveys and Assessment (CSA Ltd, February 2019). A Wildlife Friendly Lighting Scheme is essential for this application, as the site is situated within the SSSI impact risk zone (IRZ) for the Little Blakenham Pit Site of Special Scientific Interest. This site supports one of largest hibernation roosts for bats in Britain. Therefore, impacts caused by excessive lighting to commuting, foraging, and roosting bats within the site could impact upon the qualifying features of this statutory designated site. Consequently, it is recommended that a professional ecologist should be consulted to provide advice on any proposed lighting for this scheme.

Priority Species - Skylarks

We also note that Phase 2 Ecological Surveys and Assessment has indicated a maximum of three Skylarks territories. Therefore, Skylark breeding habitat will be lost as a result of the proposed development. As a result, it is recommended that a Skylark Mitigation Strategy must be provided, which provides compensation for the three Skylark territories on site. Two Skylark plots should be provided for every Skylark territory lost, following the methodology for the Agri-Environment Scheme option: '[AB4 Skylark Plots](#)'. The Skylark plots should then be secured via a period of 10 years under the s.106 agreement. Alternatively, the implementation of the skylark plots could be secured via a condition of any consent, if the identification of appropriate nearby agricultural land in the applicant's control can be provided for the Skylarks plots.

It is highlighted that an Appeal (APP/P1560/W/18/3201067 - Land off Grange Road, Lawford, CO11 2JB) was partially dismissed due to appropriate mitigation not being provided for Skylarks. Therefore, evidence must be delivered to demonstrate that on-site biodiversity interests including



species protected by s41 of NERC (and the WCA) should be conserved or adequately mitigated or compensated.

Soft Landscaping and measurable net gains for biodiversity

We approve of the proposed landscape design for this application and agree that the landscaping management for this development should be secured via a Landscape and Ecological Management Plan, which should be secured as condition of any consent, concurrent with reserved matters.

We also support the proposed reasonable biodiversity enhancements proposed within the Phase 2 Ecological Surveys and Assessment, 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 secured via a separate Biodiversity Enhancement Strategy to also be secured at reserved matters stage.

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

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

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

Recommend Conditions:

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation measures and/or works shall be carried out in accordance with the details contained in the Phase 2 Ecological Surveys and Assessment (Southern Ecological Solutions, February 2019) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination."

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

2. PRIOR TO COMMENCEMENT: SKYLARK MITIGATION STRATEGY

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

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

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



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

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

3. CONCURRENT WITH RESERVED MATTERS: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

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

The content of the LEMP shall include the following:

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

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

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

4. 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, following the recommendations of the Phase 2 Ecological Surveys and Assessment (Southern Ecological Solutions, February 2019).

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).

5. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

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

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

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

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Ecological Consultant
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.

Mid Suffolk District Council
Habitats Regulation Assessment (HRA) Record

Application details

Local Planning Authority:	Mid Suffolk District Council
Case officer	Jo Hobbs
Application reference:	DC/19/01401
Application description:	Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping
Application address:	Land To The South Of Fitzgerald Road Bramford Suffolk
Type of Application:	Outline Application

HRA Stage 1: screening assessment

Test 1 – the significance test: Based on the development type and proximity to Habitats Sites (Natura 2000 sites), a judgement should be made as to whether the development constitutes a 'likely significant effect' (LSE) to a Habitats Site in terms of increased recreational disturbance

Is the development within the 13km Zones of influence (ZoI) for the emerging Suffolk Coast RAMS with respect to the below sites?

- Deben Estuary SPA and Ramsar site
- Stour and Orwell Estuaries SPA and Ramsar site (Stour on the Suffolk side only)

YES

NO

Does the planning application fall within the following development types?

- New dwellings of 1+ units (excludes replacement dwellings and extensions)
- Houses in Multiple Occupancy (HMOs)
- Student Accommodation
- Residential care homes and residential institutions (excludes nursing homes)
- Residential caravan sites (excludes holiday caravans and campsites)
- Gypsies, travellers and travelling show people plots

YES

Conclude LSE. This proposal is within scope of the emerging Suffolk Coast RAMS as it falls within the 'zone of influence' for likely impacts and is a relevant residential development type as listed above. It is anticipated that such development in this area is 'likely to have a significant effect' upon the interest features of the aforementioned designated site(s) through increased recreational pressure, when considered either alone or in combination. Therefore:

- Proceed to HRA Stage 2: Appropriate Assessment to assess recreational disturbance impacts on the above designated sites¹
- Check [IRZs](#) to see whether recreational disturbance is an issue for non-coastal Habitats Sites (N2k sites) or Sites of Special Scientific Interest (SSSIs). If so, this will also need assessing outside of this HRA form.

Conclude no LSE to the above designated sites in terms of recreational disturbance:

- An Appropriate Assessment (AA) is not required where recreational disturbance to these sites is the only issue or recreational disturbance to these sites can be scoped out of any HRA covering other issues.
- Check NE [IRZs](#) to see whether recreational disturbance is an issue for non-coastal Habitats Sites or Sites of Special Scientific Interest (SSSIs). If so, this will also need assessing outside of this HRA form.

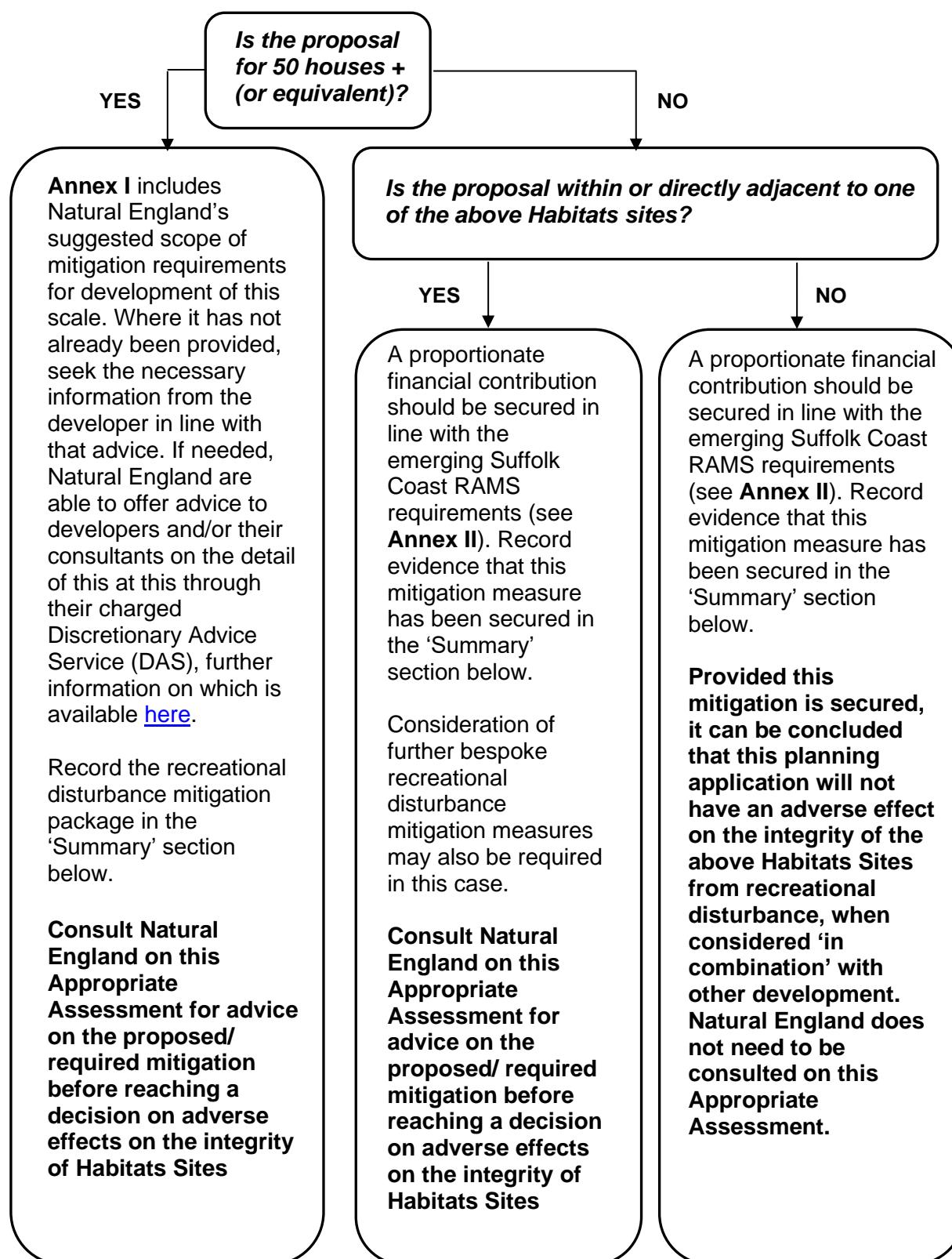
NO

The proposal is outside the scope of the emerging Suffolk Coast RAMS. However, applications involving tourist accommodation (including holiday caravans and campsites), for example, could still potentially have recreational disturbance impacts (and other impacts) on designated sites, including those listed above. In cases such as these, consult Natural England for bespoke advice before concluding no LSE.

In line with the recent Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Natura 2000 site. Therefore, all proposals which are within the scope of the emerging Suffolk Coast RAMS must proceed to HRA Stage 2 (Appropriate Assessment).

HRA Stage 2: Appropriate Assessment

Test 2 – the integrity test: The applicant must provide sufficient evidence to allow the Appropriate Assessment to be made, which is the stage at which avoidance and/or mitigation measures can be considered



Summary of the Appropriate Assessment : To be carried out by the Competent Authority (the local planning authority) in liaison with Natural England (where necessary)

Brief description of the Habitats Sites within scope

Stour and Orwell Estuaries Special Protection Area

The Stour and Orwell Estuaries have been designated as an SPA under article 4.1 of the EU Birds Directive (79/409/EEC) as it is used regularly by 1% or more of bird species listed in Annex 1. In summer, the SPA supports important numbers of breeding avocet, *Recurvirostra avosetta*, whilst in winter they hold major concentrations of waterbirds, especially geese, ducks and waders. Additional Annex 1 species recorded include Hen Harrier *Circus cyaneus*. The site also qualifies under article 4.2 of the Directive as water assemblages of over 20,000 birds use it regularly in any season.

Stour and Orwell Estuaries Ramsar Site

The Stour and Orwell site is a wetland of international importance, comprising extensive mudflats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. It provides wintering habitats for important assemblages of wetland birds and supports internationally and nationally important numbers of wintering wildfowl and waders, and holds several nationally scarce plants and British Red Data Book invertebrates.

Summary of recreational disturbance mitigation package

Test 1: Likely Significant Effect

The development is for up to 115 dwellings within the 13km Zone of Influence (ZoI) of the Stour and Orwell Estuaries SPA and Ramsar site and therefore mitigation, in line with the emerging Suffolk Coast RAMS, must be provided to minimise the impacts of increased recreational disturbance at the coastal European designated sites (Habitats sites). This is because it is considered likely that residents of new housing will regularly visit the relevant designated sites for recreation purposes.

It is considered by Mid Suffolk District Council to be “relevant development” in the context of the RAMS and so requires further consideration through the Appropriate Assessment stage to secure any mitigation measures necessary to avoid adverse effects on site integrity.

Test 2: the integrity test

Information to Support the Habitats Regulations Assessment has been provided by Southern Ecological Solutions Ltd (February 2019), which provided sufficient information to allow Mid Suffolk District Council to prepare the Appropriate Assessment. As a result, the following mitigation measures have been secured:

- Provision of SANGS and recreational opportunities for a 2.7km daily walking route for new residents (115 dwellings will generate 276 new residents (based on 2.4 people/dwelling) and 35 dogs (based on Kennel Club figures for 30% households owning a dog). These opportunities shall be promoted by way of leaflets and an interpretation board on site for the high quality greenspace to be provided as shown on the submitted and connections to the local public rights of way network. To secure the management and maintenance of these provisions, the developer will produce a long term management plan (as a condition of consent) and has committed to including signage within the open space to promote it for recreation and leaflets for new residents.

This mitigation aims to avoid impacts from the development alone.

- The proposal to erect 115 dwellings will trigger a proportionate financial contribution towards offsite visitor management measures for the Stour and Orwell Estuaries SPA and Ramsar site, in line with the Suffolk Coast RAMS Strategy (£121.89 per dwelling) for delivery prior to occupation.

This mitigation aims to avoid impacts from the development in combination with other plans and projects.

Local Planning Authority comments, signed and dated:

Mid Suffolk District Council have consulted Natural England on this HRA record and they are in agreement with our conclusions above (***).

Approving Ecologist: Hamish Jackson, Ecological Consultant

Approving Case Officer: Jo Hobbs, Acting Area Manager

Date: 03/01/2020

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

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

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated ‘dogs-off-lead’ areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

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

However, the unique draw of the above Habitats Sites means that, even when well-designed, ‘on-site’ provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together ‘in combination’. We therefore advise that consideration of ‘off-site’ measures (i.e. in and around the relevant Habitats Sites) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases.

As such, in the interim period before the RAMS is adopted, a financial contribution should also be agreed with and collected from the developer, prior to commencement, on the basis that it can be used to fund strategic ‘off site’ measures (i.e. in and around the relevant Habitats Sites). These measures should be targeted towards increasing the relevant Habitats Sites resilience to recreational pressure and be in line with aspirations of the emerging RAMS. As an example in this interim period, this could include funding towards existing wardening schemes at the relevant Habitats Sites. A suitable delivery mechanism for the measures must be agreed to secure them and ensure they are implemented from the first occupation of dwellings.

Once the RAMS has been adopted, a financial contribution should be secured from these developments prior to commencement.

¹ Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

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

Whilst the provision of well-designed open space/green infrastructure on site or contributions towards strategic green infrastructure in your district is to be welcomed for developments of this scale, a proportionate financial contribution in line with/to the Suffolk Coast RAMS should be secured as a minimum to help fund strategic ‘off site’ measures.

As such, in the interim period before the RAMS is adopted, a financial contribution should be agreed with and collected from the developer, prior to commencement, on the basis that it can be used to fund strategic ‘off site’ measures (i.e. in and around the relevant Habitats Sites. These measures should be targeted towards increasing the relevant European site(s) resilience to recreational pressure and be in line with aspirations of the emerging Suffolk Coast RAMS. As an example in this interim period, this could include funding towards existing wardening schemes at the relevant Habitats Sites. A suitable delivery mechanism for the measures must be agreed to secure them and ensure they are implemented from the first occupation of dwellings.

Once the RAMS has been adopted, a financial contribution should be secured from these developments prior to commencement.



26 April 2019

Jo Hobbs
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Dear Jo,

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/19/01401
Location: Land To The South Of Fitzgerald Road Bramford Suffolk
Proposal: Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping.

Thank you for consulting Place Services on the above application.

Holding objection to ensure that sufficient information is provided to allow the LPA to prepare a Habitats Regulations Assessment for consultation with Natural England.

We have reviewed the Preliminary Ecological Appraisal, Phase 2 Ecological Surveys and Assessment & Shadow Habitats Regulations Assessment Report (Southern Ecological Solutions Ltd, February 2019), provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species/habitats.

We are not satisfied that sufficient ecological information is currently available for determination of this application.

This is because the Shadow Habitats Regulations Assessment Report has not demonstrated that a circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding public rights of way (PRoW) is present for this development. This is required to follow Natural England's Guidelines for new developments containing 50+ houses situated within the Zone of Influence of Suffolk Coastal Habitats Sites.

¹ Taken from Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers



We note that the Shadow Habitats Regulations Assessment Report highlights the following: '*The site is also linked to existing public rights of way (PRoW) including along the river and these links provide additional opportunities for local dog walking. Hence, the on-site provision coupled with the links to the local PRoW will therefore more than meet the SANGS requirement as calculated above.*'

Therefore, to demonstrate the above statement, we request that a 2.7km circular dog walking route (within the site and/or with PRoW links) is demonstrated with an appropriate map. This should be submitted within an amended copy of the Shadow Habitats Regulations Assessment Report.

In terms of impacts to Protected & Priority species/habitats, we are satisfied that sufficient information has been provided within the Preliminary Ecological Appraisal and Phase 2 Ecological Surveys and Assessment, and recommend that the proposed biodiversity mitigation and enhancement measures and/or works should be secured as a condition of any consent.

However, as highlighted within Suffolk Wildlife Trust's comments, the breeding bird survey undertaken as part of the Phase 2 Assessments confirmed that three pairs of skylarks were breeding within the boundaries of the site. As Skylark are a UK and Suffolk Priority species it is recommended that mitigation should also be provided for this species to offset the loss of skylark breeding habitat.

Therefore, it is recommended that a Skylark Mitigation Strategy for six Skylark plots (two plots per Skylark territory lost) should be provided within nearby arable land for this application. These Skylark plots must be retained for a minimum period of 10 and should be secured by a legal agreement. However, if suitable nearby land is owned by the applicant, the mitigation could be secured as a condition of any consent, prior to commencement.

It is highlighted that the content of a Skylark Mitigation Strategy should include the following:

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

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)

Junior Ecological Consultant

Hamish.Jackson@essex.gov.uk

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

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

From: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Sent: 14 April 2020 17:05
To: Julie Havard <Julie.Havard@baberghmidsuffolk.gov.uk>
Subject: RE: Habitats Regulations Assessment - DC/19/01401 & DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Julie,

The correspondence is sufficient to indicated that Natural England have no objection subject to the mitigation being secured within the submitted Habitats Regulations Assessments. I must have missed this when I searched through my emails!

No additional information is therefore required.

Kind regards,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139

email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/hamishjackson/

From: Julie Havard <Julie.Havard@baberghmidsuffolk.gov.uk>
Sent: 14 April 2020 16:59
To: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Cc: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Subject: FW: Habitats Regulations Assessment - DC/19/01401 & DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Hamish,

The last correspondence we had from Natural England was on the 30th Jan – see attached. Are we waiting for an additional comment?

Regards

Julie

From: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>

Sent: 20 January 2020 09:39

To: consultations@naturalengland.org.uk

Cc: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>; Cheese, Kayleigh <kayleigh.cheese@naturalengland.org.uk>

Subject: Habitats Regulations Assessment - DC/19/01401 & DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Dear Sir or Madam,

Please could Natural England provide consultation responses for the attached Habitats Regulations Assessment – Appropriate Assessments, to provide confirmation whether Natural England are in agreement with Mid Suffolk District Councils conclusions contained within the reports.

Kind regards,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139

email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/hamishjackson/

From: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Sent: 17 January 2020 13:08
To: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Subject: FW: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Hamish,

The applicants have agreed with the draft HRA record for both 19/01401 and 19/01649. Would you be able to pass to Natural England now for comment?

Many thanks,

Jo

Jo Hobbs
Principal Planning Officer
Development Management, Sustainable Communities
Babergh District Council and Mid Suffolk District Council
T 01449 724620
M 07749 437470

Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given.

From: Paul Sutton <Paul.Sutton@struttandparker.com>

Sent: 10 January 2020 17:22

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>; Christopher Smith <christopher.smith@hopkinshomes.co.uk>

Subject: RE: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Jo,

Having discussed this with our client, they are happy to agree with the HRA content, including the contribution for recreational disturbance to protected sites.

Kind regards,

Paul

Paul Sutton BTP MRTPI Dip Urban Design IHBC

Director and Head of Cambridge Planning

Strutt & Parker

66-68 Hills Road

Cambridge, CB2 1LA

Direct: 01223 789391 | Mobile: 07585 775741 | Office: 01223 459500

From: Jo Hobbs [mailto:Jo.Hobbs@baberghmidsuffolk.gov.uk]

Sent: 07 January 2020 16:10

To: Paul Sutton <Paul.Sutton@struttandparker.com>; Christopher Smith <christopher.smith@hopkinshomes.co.uk>

Subject: FW: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Dear Paul and Chris,

A happy new year to you both. Following submission of the revised plans for the above scheme in December, our ecologist has responded with a draft Habitats Regulations Assessment for both applications for you to review and agree to, including the contribution for recreational disturbance to protected sites.

If you could confirm you are happy with both we will forward on to Natural England for agreement.

Kind regards,

Jo

Jo Hobbs

Principal Planning Officer

Development Management, Sustainable Communities

Babergh District Council and Mid Suffolk District Council

T 01449 724620

M 07749 437470

Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given.

From: Hamish Jackson, Ecological Consultant <Hamish.Jackson@essex.gov.uk>

Sent: 03 January 2020 12:07

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

Subject: DC/19/01649 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk (Duplicate Application).

Hi Jo

Please also see the attached ecological comments and HRA Appropriate Assessment Record Draft for duplicate application of this development.

As highlighted in my previous email, please can you not upload the Habitats Regulation Assessment until it has been approved by the developer and Natural England.

Kind regards,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139

email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk

web: www.placeservices.co.uk

linkedin: www.linkedin.com/in/hamishjackson/

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From: Hamish Jackson, Junior Ecological Consultant <Hamish.Jackson@essex.gov.uk>
Sent: 11 April 2019 10:25
To: Jo Hobbs <Jo.Hobbs@aberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Green <planninggreen@aberghmidsuffolk.gov.uk>
Subject: Land To The South Of, Fitzgerald Road, Bramford, Suffolk - DC/19/01401

Good morning Jo,

I am just reviewing the above application and note that the supporting documents suggest that the following documents should be included:

- Habitats Regulations Assessment Report by SES;
- Preliminary Ecological Appraisal by SES;
- Phase 2 Ecological Surveys and Assessment Report by SES;

These documents don't appear to be uploaded on to the planning website. Therefore, is it possible to add these documents for me to assess?

Many thanks,

Hamish

Hamish Jackson BSc (Hons) GradCIEEM MRSB
Junior Ecological Consultant at Place Services

telephone: 03330 320980 mobile: 07740901139
email: hamish.jackson@essex.gov.uk / ecology.placeservices@essex.gov.uk
web: www.placeservices.co.uk
linkedin: www.linkedin.com/in/hamishjackson/



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

From: Landscape <Landscape@essex.gov.uk>
Sent: 17 January 2020 14:15
To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>; Jack Wilkinson <Jack.Wilkinson@baberghmidsuffolk.gov.uk>
Cc: Landscape <Landscape@essex.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - DC/19/01401

Hi Jack,

Since our last consultation response dated 02/01/2020, no further information has been submitted and therefore are existing comments still stand.

Any queries, please let me know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant at Place Services

telephone: 03330320591 | mobile: 07775008053
web: www.placeservices.co.uk
linkedin: www.linkedin.com/in/ryanhmills

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

From: planninggreen@baberghmidsuffolk.gov.uk <planninggreen@baberghmidsuffolk.gov.uk>
Sent: 08 January 2020 08:10
To: Landscape <Landscape@essex.gov.uk>
Subject: MSDC Planning Re-consultation Request - DC/19/01401

Please find attached planning re-consultation request letter relating to planning application - DC/19/01401 - Land To The South Of, Fitzgerald Road, Bramford, Suffolk

Kind Regards

Planning Support Team

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

02/01/2020

For the attention of: Jack Wilkinson

Ref: DC/19/01401 - Land to the south of Fitzgerald Road, Bramford

Thank you for re-consulting us on the outline planning application (some matters reserved) for a residential development of up to 175 dwellings and access, including open space and landscaping.

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

Since we were last consulted the indicative landscape masterplan (Dwg ref. GUA-DR-L-001 Rev. P01) and Landscape and Visual Impact Assessment (Ref: 19-43 LVIA-Fitzgerald Road, Bramford- Dec 2019) have been amended in response to previous comments. We welcome these amendments and we are of the opinion the development has progressed considerably.

Review of submitted information

We welcome the revised Landscape and Visual Impact Assessment (LVIA) that has been submitted. The LVIA now includes a section on cumulative impacts that takes into consideration two further planning applications on the northern settlement edge of Sroughton. As identified, there are no 'in combination views', however there are 'Sequential views'. These have been appropriately assessed and we accept that in combination effects will be 'minor adverse'.

Similarly, we are satisfied that the overall landscape and visual assessment accurately represents the likely scale of effect. The majority of the views will be adversely impacted upon, with many attaining a 'moderate' to 'major' adverse scale of effect/importance result. All the PROWs have been assessed as having a minimum of moderate adverse scale of effect. Although all the surrounding PROWs have importance, given the additional significance of the nearby Special Landscape Area (SLA) we would deem that views from the Gipping Valley River walk have significant importance and therefore we would be looking to reduce the scale of effect from these views as much as attainably possible. For this reason we would recommend that substantial mitigation planting is proposed on the south west boundary. This should be planted in advance of any development to allow it to establish and provide some maturity to the landscape scheme.

Furthermore, the indicative landscape masterplan (Dwg ref. GUA-DR-L-001 Rev. P01) provides a detailed explanation of the landscape principles, planting strategies and enhancements proposed. The proposal presents a high-quality landscape scheme with SuDS, native planting and natural play features proposed. As demonstrated in Policy CS5 of the Mid Suffolk Core Strategy (MSDC) Development Plan document (Adopted 2008) "The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character."



Therefore, if approval of this outline application is forthcoming then we would advise on-going design and landscape discussions are held to ensure any developing scheme meets the needs and recommendations of the LPA. A few recommendations worth noting include:

- We would expect all residential plots to have appropriate private outdoor space and therefore this should be accounted for when designing the layout and plot arrangement. For example, private outdoor space should be as far as possible usable rectangular garden shapes. 1-2-bedroom houses should have a minimum of 50m², whilst 3+ bedrooms should have a minimum of 100m².
- Visual variation should be provided by incorporating a variety of building types, facing materials, features such as gables and bays and a varied skyline incorporating chimneys and dormers.
- Areas of lower density should have a looser grain with front gardens, varied alignment and mixed surface treatment.
- The use of parking courts should be avoided. If proposed they should be designed to provide adequate space for parking and access to properties whilst also providing suitable soft and hard landscaping that ensures the space is of high quality and in turn remains active.
- Proposed terrace arrangements normally lead to refuse/garden access being via long, convoluted routes. In these instances, it would be considered appropriate to provide refuse storage at the front of units in hidden or secluded arrangements such as projected porches on properties or internal passageways (ginnels) so the rear gardens are easily accessible.
- Street trees and SuDS should be incorporated within the built envelope. The inclusion of bioretention areas/rain gardens and/or swales on streets would be welcomed, as this would reduce the reliance on 'pipe to pond' and engineered solutions.
- We would expect all SuDS to have soft-engineered outlets and inlets, as well as no fencing to ensure they are sympathetic to the local landscape character. We would also expect to see advanced planting where possible.

We would also advise the following reserved matters conditions are considered:

1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING.

Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other constriction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

3. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard, soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting.

4. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

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

Yours sincerely,

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

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



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

10/05/2019

For the attention of: Jo Hobbs

Ref: DC/19/01401 - Land to the south of Fitzgerald Road, Bramford

Thank you for consulting us on the outline planning application (some matters reserved) for a residential development of up to 175 dwellings and access, including open space and landscaping.

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

As demonstrated in Policy CS2 of the Mid Suffolk Core Strategy (MSDC) Development Plan document (Adopted 2008) the application site sits outside the settlement boundary, which means the development is classed as a 'countryside development'. The policy states that "countryside development will be restricted to defined categories". These include: conversion of rural buildings, replacement dwellings, affordable housing, recreation and tourism and the preservation of listed buildings.

Furthermore, since this application was submitted, Mid Suffolk and Babergh District Council have been able demonstrate their five-year land supply to meet housing needs in the future. Therefore, the phasing of green field site allocations will need to take account of the first priority, under PPS3, for using previously-developed land.

Review of submitted information

The Landscape and Visual Impact Assessment (LVIA) accurately represents the likely effects of the proposal on the landscape, stating that the majority of views will be adversely impacted upon, with many attaining a 'moderate adverse' scale of effect/importance result, which means the proposal will be incongruous to the current characteristics and setting. Furthermore, the site is located outside the settlement boundary and when assessing cumulative impact with other application sites in the area, there are concerns of coalescence with Sproxton. Therefore as suggested as part of our pre-application consultation, an analysis of cumulative impact of the surrounding development in Bramford should be submitted before being determined.

The indicative landscape masterplan (Dwg ref. 18-05 SK-02) provides a detailed explanation of the landscape principles, planting strategies and enhancements proposed. Although we note that the illustrative masterplan has attempted to demonstrate a landscape-led approach, features such as the proposed strong vegetation buffer proposed on Loraine Way will impact on the existing landscape character of the area, enclosing and reducing any open views over the landscape towards the Gipping River. In turn, this will influence the sense of place and have an adverse impact on the existing village character and setting.

Moreover, the view across the open fields towards Gipping River has been identified in The Bramford Parish Plan and Village Design Statement (2012) as a key view that should be retained. It states that

“the south of the village has a close relationship to open countryside.” and “Significant views into the village of Bramford can be enjoyed from a well-used public footpath that crosses the south field diagonally.” Generally, the village character is reflected through its “the rural setting” and “the open southerly approach”. This proposal therefore will have a detrimental impact on this character and in turn we would advise that it should be considered that proposed amount of dwellings is reduced as it seems improbable that the site will be suitable for up to 175 dwellings without urbanising the area and reducing the separation between Bramford and Sroughton.

Likely impact on the surrounding landscape

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Rolling Valley Farmlands landscape character type (LCT) adjacent to the Valley Meadowlands LCT. The LVIA assessed the site as making a positive contribution to the local landscape character as it contains attributes that are representative of the local landscape, which we agree is accurate. The LCT is considered to have a moderate landscape value due to its a positive / recognisable character and it's moderate to good condition and sense of place. Key characteristics of this LCT include; gentle valley sides with some complex and steep slopes, organic pattern of fields smaller than on the plateaux, a scattering of landscape parks and towns and villages with distinctive mediaeval cores and late mediaeval churches. As stated in Policy CS5 of the Mid Suffolk Core Strategy (MSDC) Development Plan (Adopted 2008) development will be of a “high quality” and will “conserve and enhance the character” of the area. Therefore, we would expect all proposals to preserve and/or enhance these LCT characteristics where possible. However, currently we consider the proposal adversely impacts the baseline character by extending the urbanising influences of Bramford further south along Loraine Way. Although the site has capacity to accommodate development, the proposed development has gone beyond what is considered the sites capacity.

The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich (July 2018) document assessed Bramford as one of three settlement areas in Mid Suffolk that forms part of the Ipswich Policy Area. The application site is located in Peripheral Area: BF2. This assessment concluded that “The sensitivity of land to the north and south of the village lies in its visibility from the valley floor landscapes and small scale patterns. These areas are valued in their role as an attractive setting to the settlement, and to heritage assets such as the church and listed buildings. They are also valued in defining the village and physically and perceptually separating the village from Sroughton to the south and recreation land uses to the north.”

In summary, due to the adverse impact this proposal will have on the landscape and visual amenity, and the lack of analysis in regards to cumulative development within Bramford; we cannot support an application of this nature and size in this location. However, if minded for approval I recommend that that the amount of dwellings is reconsidered prior to determination.

In the event that approval of this outline application is forthcoming then we would also advise the following reserved matters conditions are considered:

1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING.

Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other constriction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

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site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting.

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Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

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

Yours sincerely,

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

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

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

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

23rd April 2019

Dear Jo,

RE: DC/19/01401 Outline Planning Application (some matters reserved)- Residential development of up to 175 dwellings and access, including open space and landscaping. Land to the South of Fitzgerald Road, Bramford

Thank you for sending us details of this application, we have read the Preliminary Ecological Appraisal, Phase 2 Assessments and Habitats Regulations Assessment (all Southern Ecological Solutions, February 2019) and whilst we are broadly satisfied with the findings of the consultant, we have the following concerns:

The breeding bird survey undertaken as part of the Phase 2 Assessments confirmed that 3 pairs of skylarks were breeding within the boundaries of the site. Although mitigation has been suggested for other bird species, there are no recommendations for skylarks. Skylark are a UK and Suffolk Priority species and are on the 'Red' list of Birds of Conservation Concern (BoCC) due to population declines. Compensation for the loss of suitable nesting habitat for this species must therefore be sought as part of this proposal. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

We note that the reptile survey visits were undertaken during the summer of 2018 when weather conditions were consistently hot and dry. Despite the survey adhering to guidelines, these conditions are sub-optimal for observing reptiles due to the stable high ambient temperature negating the need for them to bask. We would therefore request that care is taken when performing any vegetation clearance around the boundary regions of the site. If any reptiles are found during pre-construction works, a suitably qualified ecologist should be contacted immediately for further advice.

We request that the recommendations made within this letter and the reports are implemented in full, via a condition of planning consent, should permission be granted.

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

Yours sincerely

Jill Crighton
Conservation Planner

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