

NEEDHAM MARKET TOWN COUNCIL

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Needham Market Town Council Consultation Submission Letter

DC/20/05046 Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990.

Erection of 279No dwellings (including 100 affordable dwellings) and access. Land On The North West Side Of Barking Road Needham Market Suffolk

21st January 2021

Dear

The Town Council's Consultation Submission consists of this letter and its separate Consultation Submission Report.

The Town Council **objects** in the strongest terms to the Planning Application.

The Consultation Submission Report provides the details supporting the objection. There is an overriding factor the Town Council wishes to be taken account of in the determination process.

The Town Council ardently believes the obligations for the process of public consultation, required under the provisions of Article 15 of the Development Management Procedure Order, cannot be achieved in current circumstances whilst the local community is subject to severe restrictions under Central Government's Coronavirus Tiers and more latterly, the current National Lockdown. The Town Council has consequently been unable to engage with and involve the local community in the consultation process as it would normally ensure it does so. For this reason, the Town Council recommends Mid Suffolk District Council negotiate a Planning Performance Agreement with the applicant or, if that is not possible, suspends determination of the application until such time as its obligations to consult can be fully exercised.

Yours sincerely,

Town Councillor Steve Phillips
Chairman of Council and Town Mayor



Needham Market Town Council

Consultation Submission Report

DC/20/05046 Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990.

Erection of 279No dwellings (including 100 affordable dwellings) and access. Land On The North West Side Of Barking Road Needham Market Suffolk

1. Site Context and Constraints

1.1 An outline application on part of the site was refused by Mid Suffolk District Council in August 2017 (Reference No: 16/3506). The application was recommended for approval by Officers and at the time the District Council could not evidence a 5-year housing land supply. The recommendation was overturned by the Planning Committee and the reasons for refusal were:

- The main access point was at risk of flooding
- The distance from school and community facilities
- It was not considered to be good design
- The application was no considered to conserve or enhance the character of the area
- The application did not constitute sustainable development

The refusal was not appealed.

1.2 The site was put forward for inclusion in the emerging Local Plan in 2018 by a developer. It is not known if the developer is still connected to the site as the application is made by the landowners.

1.3 The site was assessed through the SHELAA, which was updated in October 2020 ahead of the publication of the Pre-Submission (Regulation

19) Version of the Babergh Mid Suffolk Joint Local Plan (Site SS0028). The SHELAA identifies the site as suitable for development in principle subject to further work to be undertaken to investigate the following issues:

- Safety of access through a flood zone
- Part of the site lies within a Mineral Safeguarding Area
- Potential for Flood risk impacts on nearby Site of Special Scientific Interest

- 1.4 The site lies outside of the Settlement Boundary for Needham Market and for Barking as identified in the Adopted and Emerging Local Plans and the emerging Needham Market Neighbourhood Plan.
- 1.5 The site lies outside of the Conservation Area for Needham Market and there are no formal wildlife designations on site.
- 1.6 The site is not allocated for residential development in the Adopted Local Plan, or the emerging Local Plan or the emerging Neighbourhood Plan.
- 1.7 The Pre-Submission Version of the BMSJLP was approved for consultation on the 12th November 2020; the application was submitted on the 10th November which was prior to the Local Plan being formally published although it was available as part of the committee papers for the preceding week. It is therefore unlikely that the application has been informed by the emerging JLP to any great extent and reference to the emerging JLP in the application's supporting information are likely to be references to the previous version which was published in July 2019. The consultation period for the JLP 2020 ran until 24th December 2020 and it is expected that the JLP will be submitted for examination early in 2021.

2. Assessment against the Adopted Development Plan and Emerging Development Plan policies

- 2.1 The adopted Development Plan for the area is the Mid Suffolk Core Strategy (2008) and the Mid Suffolk Core Strategy Focussed Review (2012) and the saved policies of the Mid Suffolk Local Plan (1998).
- 2.2 The replacement for the Core Strategy – the Babergh Mid Suffolk Joint Local Plan – Pre-Submission Version (Regulation 19) was published for consultation on 12th November 2020 and the end of the consultation is 24th December 2020. The Needham Market Neighbourhood Plan was submitted to Mid Suffolk on 11th November 2020 and the Regulation 16 Consultation period is due to end on the 27th January 2021.

- 2.3 The application site is designated as countryside and lies outside the defined settlement boundary of Needham Market. The Adopted Development Plan policies seek to restrict residential development in the countryside as set out in Core Strategy policies CS1 and CS2 which state that only development for rural exception housing will be permitted. The proposal includes both open market and affordable housing and does not represent a rural exception site for the purposes of the Core Strategy, Therefore, the erection of up to 279 dwellings on the site would be directly contrary to the adopted development plan.
- 2.4 As noted earlier, a previous outline application for 152 dwellings was refused in 2017. At the time, the District Council could not demonstrate a 5-year housing land supply and therefore the “tilted balance” approach outlined in the National Planning Policy Framework (NPPF) paragraph 11 (d) i. was engaged. Paragraph 11 d) requires that where there are no relevant development plan policies or the policies that are most important for determining the application are out-of-date, that planning permission should be granted unless policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF when taken as a whole. The District Council felt that due to a shortfall in the housing supply that they could not refuse the application on the grounds that the development fell outside the settlement boundary and in the countryside. Now there are a Local Plan and a Neighbourhood Plan emerging and at an advanced stage, there are additional grounds for considering refusal of the current application.
- 2.5 Mid Suffolk District Council’s most recent Annual Monitoring Report was published as a supporting document to the Pre-Submission Version of the Joint Local Plan (2020) and is the most up to date position statement on the land supply issue. It indicates that Mid Suffolk has a 7.67-year supply of adequate housing land against the five-year requirement with a surplus of housing across the district of over 1,500 homes. Given that Mid Suffolk can demonstrate a five-year supply of housing in accordance with the NPPF, adequate housing can be achieved without having to develop this site. Therefore, Mid Suffolk’s adopted policies with regards to development in the countryside outlined above are engaged. An objection to the principle of the application can be justified on these grounds.
- 2.6 In the statement that supports the application, it is suggested that despite the Council now having a 5-year land supply, that the policies are still ‘out of date’ and consequently more weight should be given to the emerging

Local Plan. This raises two issues. Firstly, as the emerging Plan is not yet adopted, the existing adopted Local Plan can be attributed some weight and is still a relevant policy consideration, which includes Policies CS1, CS2 and H7 all of which seek to restrict housing development outside of settlement boundaries and in the open countryside and therefore the application site. Secondly, if you follow the logic of the Agent and attribute more weight to the emerging Local Plan, the application is still in conflict with those policies – specifically SP03 and SP04 which seek to direct new development to locations within existing settlements boundaries or through specific allocations.

- 2.7 Table 4 of the Emerging Joint Local Plan 2020 identifies the housing requirement for Needham Market over the plan period as 512 homes. On 1st April 2018, there were outstanding planning permissions for 311 homes for Needham Market. In addition, the emerging JLP makes three specific housing allocations as outlined in Section 2 above which equates to 512 dwellings in total. The housing target for Needham Market to 2037 has already been met. There will also no doubt be other individual permissions granted for individual dwellings since the base date of the plan or other windfall sites that will come forward within the built-up area of the town over the plan period which will be added to this commitment. Whilst it is accepted that the housing requirement is a minimum figure and does not automatically preclude further development from taking place, an additional 279 units as proposed by the application results in significant additional development in Needham Market which has not been strategically allocated and puts considerable strain on the existing infrastructure of the Town.
- 2.8 In addition, the Needham Market Neighbourhood Plan makes it clear that *“The Needham Market Neighbourhood Plan does not anticipate making further allocations for new development given the high levels of outstanding commitment and the level of change that will occur as those commitments and allocations come forward during the plan period. The Neighbourhood Plan policies will instead provide guidance for applications that come forward on the sites identified in the emerging BMSJLP plus any windfall 10 sites that may come forward within the existing built-up area boundary (settlement boundary).”*
- 2.9 The proposal therefore clearly conflicts with the both the adopted and emerging planning policy that covers the area. The principle of development on this site is in clear conflict with the relevant policies for the reasons given above. As described below, there are also several other key issues which the application as proposed presents.
- 2.10 As part of the early stages of the preparation of the Neighbourhood Plan, Needham Market Town Council commissioned consultants AECOM

to prepare a Concept Framework for the long-term expansion of Needham Market. The resulting Feasibility Report proposed an expansion of the town to the west of its current location, including a relief road. The relief road aims to divert HGV traffic from the High Street and improve the streetscape quality. Congestion and parking issues in the town centre specifically the High Street having been a concern of local residents for some time.

- 2.11 The Feasibility Study was subject to extensive public and stakeholder consultation both on the principle of strategic growth and more detailed aspects of the proposed approach.
- 2.12 Following feedback from this consultation and the publication of the Preferred Options of the Babergh and Mid Suffolk Joint Local Plan in July 2019, which included a figure of just 497 homes for Needham Market up to 2036 (which was already largely committed), the Town Council decided not to proceed with the approach set out in the Feasibility Study as the level of strategic housing growth envisaged was not required at this time.
- 2.13 However, the Town Council remains acutely mindful of the need to plan for the longer term (including the next Neighbourhood Plan) and to anticipate the future growth of Needham Market beyond the current Local Plan allocations. The Town Council commissioned AECOM to set out further design guidance on how strategic growth should be planned and designed to create an attractive, sustainable, and resilient expansion of Needham Market if this is needed in the future. The aim was to assist the Town Council in positively shaping the future of Needham Market and support on-going engagement with residents, businesses, and other stakeholders on how the Town should grow in the future.
- 2.14 Both AECOM reports are supporting documents and do not have development plan status, although the Feasibility Study was the subject of public consultation. On 9th December 2020, at a meeting with Mid Suffolk Neighbourhood Plan Groups, MSDC Assistant Director, Sustainable Communities, Tom Barker stated that evidence gathered whilst preparing a Neighbourhood Plan either in the form of technical reports or public consultation results should be used by Town and Parish Councils to inform their responses to planning applications and that evidence would be treated as material in the determination of the application.
- 2.15 The application site falls within part of the overall concept framework for the long-term expansion of Needham Market. The access from Barking Road is generally consistent with the siting of the proposed primary Relief Road as shown in the concept framework and the spine road broadly follows the same route across the site. However, it is highly unlikely that

any Relief Road will be constructed within the current housing target period ending in 2037 and it would be a serious mistake to construct a large housing group up to the edge of this road too early as this would constrain the detailed siting and design of the proposed Relief Road, limiting potential access points etc. Given the amount of detail in the concept framework it is disappointing that the application does not contain better proposals for pedestrian and cycle connections both within the site itself and externally to local facilities and the town centre.

- 2.16 Whilst the primary access and route across the site proposed in the application does broadly match that of the development framework, it is important that if the District is minded, to grant approval for the application, then it should ensure the subsequent detailed application takes the suggested location of a Relief Road and associated Primary Roads, as set out in the AECOM Reports, into account.

Conclusion

It is concluded that that there are several fundamental planning policy and technical issues with the application and that it does not constitute sustainable development.

1. The site lies outside of any defined settlement boundary and within open countryside where there is a policy presumption against residential development.
2. In October 2020, Mid Suffolk District Council can demonstrate a 7.67-year housing land supply which exceeds the required 5-year.
3. The application will have a significant adverse impact on the existing highway network and on local community infrastructure.
4. The application fails to adequately address the extra demand the development will cause on highways, educational and health services infrastructure.
5. The application would only become acceptable and sustainable if the new Needham Market Relief Road were constructed, which is not likely until after 2037. The impact on the existing highway network, including in the historic core of the town, will otherwise be severely detrimental.
6. The site is not the most sustainable location for new housing, has poor accessibility and pedestrian and vehicular connections to the town and is remote from local services and facilities. Future residents would inevitably have reliance on private vehicles and the application does not propose alternative sustainable transport modes.

7. The previous refusal on the grounds of Flood risk in relation to the access on Barking Road has not been overcome and there is a clear objection to the principle of development in this location on the grounds of adequate access.
8. The Flood risk in Needham Market is increasing and therefore the additional impact of development in the proposed location should not be measured in isolation but in the context of and, from the town's perspective and experience with recently developed sites, added hard surfaces and lack of control over hard landscaping and its manifest effect.
9. There is uncertainty around the proposed and poorly located 'emergency access' on to Quinton Road and the impacts of such an access in terms of highway safety and traffic congestion have not been addressed.
10. The removal of bus routes within the residential areas of Needham Market means there is no immediate and easy access from the proposed development site available to use this mode of public transport. Consequently, this will generate increased reliance on using private vehicles for journeys, increased traffic congestion and higher levels of air pollution.
11. The application is not supported in policy terms by either the existing adopted Development Plan or the emerging Joint Local Plan 2020 or the emerging Neighbourhood Plan November 2020.
12. The site is not allocated for development in any formal planning document as there is no overriding need for the development as housing requirements for the area have been met.
13. The application does not constitute a form of sustainable development. It reflects very little empathy with the contemporary and critical necessities for use of resources, growth and consumption and therefore would add to the threat of damage to ecosystems and the well-being of current and future residents of Needham Market. There is no overriding need for an exception to be made for planning permission to be granted.

Barking Parish Council wishes to object to planning application DC/20/05046 - Land to the north west side of Barking Road Needham Market for the following reasons:

Access to the site

The access to the site is not suitable or safe. The site's junction with the B1078 is close to two fatal road crashes (2004 & 2016) and an extra 500+ vehicles plus commercial vehicles each day will increase risk. The second access is onto Bridleway 15 which is a recreational routes for dog walkers, cyclists and horse riders out of Needham Market. The bridleway leads onto Quinton Road which the buses had to stop using as they were unable to negotiate the parked cars. (Thus the residents lost their bus route.) This could make access for any emergency vehicle extremely uncertain.

Evidence – Consultee SCC Highways comment “Two access points are required - Bridleway 15 should not be considered for emergency access, the bridleway is for cycling and pedestrians. The existing bus service is not suitable for commuting purposes. SCC declared Climate Emergency and it is a 5.5 mile drive to the nearest secondary school.

Flood risk

Building on and close to flood risk areas will cause problems. The slope of the site and hard surfaces will naturally guide water down towards the flood plain that Needham Market sits in and down towards the B1078. In fact, Mid Suffolk had to fund and carry out remedial work when the existing Chainhouse estate was built due to the poorly accommodated flood risk and surface water problems created by the development. Will one small lake accommodate the water ?

Evidence – Consultee Environment Agency HOLDING OBJECTION comment - flood zones 1,2 and 3 lie to the south of the site, medium and high probability zone making site a vulnerable development. The FRA undertaken does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. The FRA does not include details of the Flood Response Plan and therefore there would be an unacceptable risk to the health and safety of the occupants in a flood event.”

Traffic

The development would generate a suggested 500+ vehicle movements each day. This will cause congestion and add to poor air quality. These extra vehicles will be joining the many accessing the A14 and A140 each day under the narrow bridge that floods, is closed at least each month due to incidents thus causing people to travel to Stowmarket or Claydon to join the A14. The farthest point of the development is just over 1km from the nearest Co-op and involves walking along a narrow busy roadside that will be even busier if this development goes ahead. Most probably people will drive here – however there is only limited parking provision in Needham Market.

Trains do not go directly to London and connections to Ipswich are about one per hour. The buses are one per hour at commuting times and then half hourly. There are no buses on Sundays. Would this be sufficient provision for 279 households – probably they will rely on private cars.

Will the 1.8m wide footpaths be wide enough to accommodate cyclists through the estate to the town to encourage green transport.

Evidence – Consultee Environment Agency Air Quality Management – HOLDING OBJECTION comment“ With 500 + vehicle movements per day screening and assessment is needed. The Institute of Air Management says the development has not demonstrated the impact is reasonable, and/or manageable. Also the applicant is expected to demonstrate that the increased vehicle movements

will not significantly impact on air quality within Needham Market High Street and also demonstrate that the additional vehicle movements do not add to queues at width restricted bridge (which is the tenth most hit bridge in England,) under the Norwich/London mainline resulting in queuing traffic and resultant impacts on air quality. **Holding objection** until such a time as applicant can demonstrate the impact of the development is acceptable and/or manageable.

Waste Management comment – There could be concern that a 32 tonne RCV could manoeuvre safely around the site.

Listed Buildings

Kennels Farmhouse is close to the site and there are another eight listed buildings that would have their ancient settings affected by the development. These are set within the rolling arable fields of Barking and as you leave Needham Market and approach these houses and church the countryside sets them off. Travelling through a housing estate to approach these would entirely destroy their historical setting as in section 16 of the Local Planning Policy Framework. The cumulative impact of this development on the landscape, environment and heritage characteristics of Barking will not be appropriate to the scale and location of the proposal. Policy CS15 states there should be locally identified need. There is no evidence of this in the application and scant assistance for affordable housing.

Visual Impact

Barking's boundary will be compromised – it will erode the buffer between Barking and Needham Market. The visual impact of this proposed development cannot be understated. Upon passing the current doctor's surgery – the Needham Market Country Practice, there is beautiful open countryside, with a handful of houses on either side of the road which are largely set back off the road and are therefore unseen/shielded from view. This proposed development will be a huge negative visual impact, and the associated considerable night light pollution, totally out of character with the rural setting. The site rises significantly several metres above the level of the road and surrounding fields, and the light pollution at night will have a huge negative impact on the local area and on local wildlife.

The site falls within a Special Landscape Area designated by Mid Suffolk DC as identified in the Local Planning Policy Framework with its landscape sensitivity and scenic quality. The slope of the site will increase the visibility of the development and make it more imposing.

Any building of a relief road would exacerbate the above and cause congestion not only onto the B1078 but also cause a build up of traffic turning onto Needham Market High Street from the B1078 with the resultant negative impact on air quality.

Biodiversity

The site is home to numerous species of wildlife on which the negative impact of this proposed development will be felt. The Landscape and Visual Impact Assessment – S.10, states that there is likely to be rabbit and deer activity on or around the site. Hares are known to frequent this field. The loss of farmland species was highlighted recently by BBC 'Countryfile'. Once again, such large housing developments on greenbelt and in particular prime agricultural land is totally unacceptable. Wildlife is increasingly dependent upon a decreasing habitat. Emphasis should be placed on protecting existing habitats, not concreting over them over so they are lost forever. Spiteshall Copse is an ancient woodland is on the boundary of the development and needs protection from the intrusion.

Evidence -- Ecology Place Service HOLDING OBJECTION comment – there is insufficient information on European Protected Species : Hazel Dormouse, bats, protected species reptiles, protected farmland species as Skylark. Last survey was conducted in 2016

Agricultural Land

The site sits on grade 2 agricultural land which is of very good quality for food production – maybe a better use of land. (Source Natural England)

The following text is taken from the refusal document from 2016:

Mid Suffolk District Council as Local Planning Authority, hereby give notice that OUTLINE PLANNING PERMISSION HAS BEEN REFUSED for the development proposed in the application in accordance with the particulars and plans listed in section A for the following reasons:

1. The proposed development fails to ensure that safe and suitable access to the site can be achieved for all people having resort to a single vehicular and pedestrian access point which would be at risk of flood events and fail to ensure reasonable access or evacuation at times of flood. The development is moreover at a considerable distance from school and community facilities. On that basis the development would not represent good design and would not make the place better for residents of the locality. On that basis the development would be unacceptable having regard to paragraph 101 to 103 of the NPPF, paragraph 32 of NPPF and would fail to represent sustainable or precautionary development which would not conserve or enhance the local character of the area nor improve the economic, social or environmental conditions of the area contrary to policies FC1 and FC1.1 of the CSFR and policy CS4 of the Core Strategy.

There have been no material changes since this application and the new application for even more houses will exacerbate any such problems. Overall, the problem is the sheer scale of the development which in turn leads to a very large impact on an already enlarged town with stretched facilities. It will negatively impact on the character of the surrounding area.

As the Needham Market Society have demonstrated it is quite clear that no more houses are required by the Local Plan.



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

Our ref: AE/2020/125659/01-L01
Your ref: DC/20/05046
Date: 01 December 2020

Dear Ms Whyard

APPLICATION FOR OUTLINE PLANNING PERMISSION (SOME MATTERS RESERVED, ACCESS TO BE CONSIDERED). TOWN AND COUNTRY PLANNING ACT 1990. - ERECTION OF 279NO DWELLINGS (INCLUDING 100 AFFORDABLE DWELLINGS) AND ACCESS.

LAND ON THE NORTH WEST SIDE OF BARKING ROAD, NEEDHAM MARKET, SUFFOLK

Thank you for your consultation dated 11 November 2020. We have reviewed the application as submitted and are raising a holding objection to the application on flood risk grounds. We also have some comments in relation to Foul Drainage that will require clarification.

Flood Risk

Whilst the majority of the site sits within Flood Zone 1, our maps show the South of the site is located in fluvial Flood Zones 2 & 3, medium & high probability zone. The proposal is for Outline Planning Permission (some matters reserved, access to be considered) for the erection of 279No dwellings (including 100 affordable dwellings) and access, which is classified as a 'more vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification](#) of the Planning Practice Guidance (PPG). Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site specific Flood Risk Assessment (FRA).

We have not undertaken any detailed modelling for the nearby ordinary watercourse, so this source of flood risk has not been assessed for the purpose of the flood map.

The submitted flood risk assessment (FRA), undertaken by JMS, referenced EX 1807704 and dated Nov 18, does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference ID: 7-030-20140306. This FRA does not, therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development and we are raising a

holding objection. In particular, the submitted FRA fails to:

- Identify the impacts of fluvial flood risk from the Ordinary watercourse which joins the main river Lion Barn Drain.
- Assess the impact of climate change using appropriate climate change allowances. In this instance, according to '[Flood risk assessments: climate change allowances](#)', the allowances that should be assessed are the Higher Central of 35% and the Upper End of 65%.
- The site/access route would be flooded by unknown depths in the 1% (1 in 100) annual probability event with climate change flood event so the flood hazard on the access route is currently unknown. The FRA does not include details of a Flood Response Plan to adequately mitigate this. Consequently, there would be an unacceptable risk to the health and safety of the occupants in a flood event. Further information on this can be found in the technical appendix at the end of this letter.

Overcoming our Objection

The applicant can overcome our holding objection by submitting an FRA that covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

Further information in relation to flood risk can be found within the technical appendix at the end of this letter.

Foul Drainage

There is very little information on whether the site will be connected into the mains foul sewer network. The application form says 'unknown' for foul sewage drainage. Section 4.5 of the 'Flood Risk Assessment & Site Strategy' has limited information and mentions joining to the Anglian Water foul drainage network. It also mentions potential capacity issues in the network.

Assuming the foul flows will be connected into the closest WRC at Needham Market, then we currently have no concerns about capacity at this sewage works. There is plenty of capacity for this development. However early consultation with Anglian Water is essential to ensure that the sewerage network can accommodate the additional flows from the development. If this application does not propose to connect to the mains we would raise a holding objection on these grounds.

We would expect to see a statement confirming how foul drainage will be treated and some indication of consultation with Anglian Water. We trust this advice is useful.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

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

Technical Appendix

Access/Egress

It will be required to demonstrate that a safe route of access and egress can be achieved in accordance with FD2320, up to the 1% (1 in 100) annual probability with climate change flood event. Or if the applicant demonstrates that a safe route of access/egress is not possible this element could be mitigated by an acceptable emergency flood plan submitted to you that deals with matters of evacuation and refuge to demonstrate that people will not be exposed to flood hazards.

Section 5.3 of the FRA states that:-

“Safe egress from the site is required as the primary means of access is through the flood zone, as per the appended layout. As per Table 3.2 of the above document; hazard to people can be determine as a function of velocity and depth, and a low degree of flood hazard needs to be maintained in order for caution to be advised during flood events, and no higher characterisation.”

However, no further detail has been provided of how safe access will be achieved, for example the flood hazard or the height of the road above flood depths and mitigation for any potential loss of flood storage or flow routing under the road to prevent displaced flows.

We also note that the lack of safe and suitable access was a reason for refusal of a previous application of this site Planning Ref: 3506/16

Reason for Refusal

The proposed development fails to ensure that safe and suitable access to the site can be achieved for all people having resort to a single vehicular and pedestrian access point which would be at risk of flood events and fail to ensure reasonable access or evacuation at times of flood.

Achievable safe access for this site needs to be determined at Outline stage. Consideration should be given to whether it is appropriate to direct the access and egress route towards the area at highest risk of flooding. The flood depths through which the access road crosses are unknown, as the watercourse is not modelled, therefore modelling should be undertaken. The modelling should ensure that a blockage of the culvert at the southeast of the site is considered.

Modelling Guidance

When reviewing the site masterplan – Drawing 043-18-0200_p2-needham market masterplan, we note that some of the plots to the far South East may fall within the floodplain. The floodplain depicted within this FRA does not seem to be an accurate representation of our Flood Zone Maps and Flood Zone 3. The extent on the drawing in the FRA is not based upon any depths nor compared to topography. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

JFLOW

The Flood Zone maps in this area are formed of national generalised modelling, which was used in 2004 to create fluvial floodplain maps on a national scale. This modelling

was improved more recently, using a more detailed terrain model for the area. This modelling is not a detailed local assessment, it is used to give an indication of areas at risk from flooding.

JFLOW outputs are not suitable for detailed decision making. Normally, in these circumstances, an FRA will need to undertake a modelling exercise in order to derive flood levels and extents, both with and without allowances for climate change, for the watercourse, in order to inform the design for the site. Without this information, the risk to the development from fluvial flooding associated with the ordinary watercourse is unknown.

In order to have fully considered all forms of flooding and their influence on the site, it will be necessary to identify the fluvial flood risk. Fluvial flood levels will be required for the main river to the South of the site. It may be appropriate to undertake some flow analysis such as FEH and 1D modelling to establish the level. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk.

We advise that modelling should be undertaken to accurately establish the risk to the proposed development in terms of potential depths and locations of flooding. The watercourse should be modelled in a range of return period events, including the 1 in 20, 1 in 100 and 1 in 1000 year events, both with and without the addition of climate change. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood depths and extents across the site.

Some areas of land within the site are likely to be subject to a higher risk of flooding than other areas within the site and an understanding of the susceptibility/vulnerability of land to flooding should be delivered through flood modelling and risk assessment in order to influence the layout of housing areas to avoid siting housing on areas of land that are susceptible to higher chances of flooding. This will allow a sequential “risk-based” approach to be applied to development within the site as directed by the National Planning Policy Framework.

Please refer to the attached documents:

- OI 379_05 Computational modelling to assess flood and coastal risk
 - Flood Estimation Guidelines
 - ‘Using Computer River Modelling as Part of a Flood Risk Assessment - Best Practice Guidance’ for further advice regarding modelling submissions.
- We acknowledge that some of the documents above refer to outdated planning policy. However, the technical guidance and our requirements regarding computer modelling remain relevant.

We would recommend that FRAs at all levels should be undertaken under the supervision of an experienced flood risk management specialist (who would normally be expected to have achieved chartered status with a relevant professional body such as the Institution of Civil Engineers (ICE) or the Chartered Institution of Water and Environmental Management (CIWEM)).

Paragraph 163 of the NPPF states:-

“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and

exception tests, as applicable) it can be demonstrated that:

1. within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different locations;
2. the development is appropriately flood resistant and resilient;
3. it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
4. any residual risk can be safely managed; and
5. safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Flood Risk Climate Change Guidance: Detailed Allowance

Climate change allowances have changed recently. The Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](#). Our guidance '[Flood risk assessments: climate change allowances](#)' provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk.

For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more appropriate to choose a flood level higher in the range.

The proposed development is classified as a “More Vulnerable” “Large-Major” development, and part of the site lies within Flood Zone 2/3a. This means the applicant must adopt a “detailed” assessment. A detailed assessment requires the applicant to perform detailed hydraulic modelling, through either re-running Environment Agency hydraulic models (if available) or construction of a new model by the developer. Assuming the lifetime of the development is until 2020, the allowances the applicant must apply are Higher Central (35%) and Upper End (65%)

We have undertaken some detailed flood modelling (Needham Market Flood Risk Study 2015) but this only extends to the south eastern corner of the site. You will therefore need to create your own model.

We recommend that you assess both the 35% and 65% allowances, and if possible design the development to be safe through raised floor levels in the 65% climate change allowance. If this is not possible then robust justification should be provided, and the development should be designed to be safe through raised floor levels in the 35% allowance and the safety and sustainability of the development should be assessed for the 65% and managed through flood resilient/resistant construction measures to the satisfaction of the LPA.

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from

surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

Surface Water Attenuation Pond

We have noted that the surface water attenuation pond is located very close to the Lion Barn Drain and could be at risk of fluvial flooding especially if the new climate change allowances are considered. This could impact its ability to function in a fluvial flood event. This pond appears to be bunded which could reduce flood plain storage if it is at risk of fluvial flooding. This may need to be investigated further and compensatory storage may need to be considered to ensure there is no net loss in floodplain storage.

Informative - Ordinary Watercourse Consent

It is noted that the main access route to and from the development for all of the properties crosses the watercourse and the area at highest risk of flooding. It should be considered if this is appropriate. An access bridge is proposed. As the Lion Barn Drain is an ordinary watercourse it falls under the jurisdiction of the Lead Local Flood Authority, Suffolk County Council. We recommend you contact Suffolk County Council to discuss this element of the works as you may require consent from them to install this structure.

Date: 02 December 2020
Our ref: 333860
Your ref: DC/20/05046



planningblue@babberghmidsuffolk.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear Ms Whyard,

**Planning consultation: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings(including 100 affordable dwellings) and access.
Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk**

Thank you for your consultation on the above dated 11 November 2020 which was received by Natural England on the same date.

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

We consider that without appropriate mitigation the application would:

- damage or destroy the interest features for which Barking Woods Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required:

- high quality on-site Green Infrastructure with associated provisions, including a dedicated 'dogs-off-lead' area.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Further advice on mitigation

Suitable Accessible Natural Green Space (SANGS)

There is concern for the impacts of increased recreational pressure on Barking Woods SSSI, in particular the impacts of trampling, nutrient deposition and the disturbance of birds utilising the site. These birds are sensitive to disturbance from recreational walkers, cyclists etc. and in particular

dogs off leads. We advise that 279 dwellings in this location has the potential to increase the local population by approximately 670 people (based on 2.4 people per household) once the dwellings are occupied. Assuming the national average of 30 % of households owning dogs¹, the proposal could lead to an additional 167 dog walks per day, based on twice-daily walks. With the site in such close proximity to Barking Woods SSSI it is considered that residents are likely to use the accessible areas of woodland for undertaking regular recreational activities such as dog walking.

Natural England recommends that large developments include the provision of well-designed open space/green infrastructure that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary. The applicant may wish to consider to benchmark standards for accessible natural greenspace, the TCPA have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% green infrastructure as a target quantum. The [Suitable Accessible Natural Green Space \(SANGS\)](#) guidance 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. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi natural areas planted with a range of native species
- Circular dog walking routes of 2.7km within the site/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

Dog owners require space to walk their dogs off lead close to home and away from traffic, once or twice per day. If the onsite green space does not give adequate dog walking provision, most owners will travel elsewhere. Well-designed GI should positively accommodate off-lead exercising of dogs, in areas where this causes the least conflict with other resident's interests such as cycling, children's play equipment, sports activities and people seeking to minimise contact with dogs. We recommend that the developer consults relevant guidance and best practice documents such as [Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value](#) and incorporates these principles within proposed application designs. A large semi-natural 'dogs-off-lead' area located on-site would contain the majority of 'dogs-off-lead' recreation on site, provide space for nature and minimise disturbance to breeding and foraging birds utilising Barking Woods SSSI.

Net gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 170, point d and Para 175, point d of the National Planning Policy Framework which states that:

Para 170: "Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

Para 175: "When determining planning applications, local planning authorities should apply the following principles:

¹Based on figures obtained from *Number and ownership profiles of cats and dogs in the UK*, Jane K Murray, William J Browne, Margaret A Roberts, Amber Whitmarsh and Timothy J Gruffydd-Jones, *Veterinary Record*, 6 February 2010.

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity”.

Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to [Technical Note 2](#) of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into developments.

Lighting strategy

We advise that operational lighting should be designed through a lighting strategy to limit light spill to sensitive ecological receptors.

Ancient woodland, ancient and veteran trees

An undesignated area of Ancient & Semi-Natural Woodland extends from Barking Woods SSSI towards the development site (approximately 235m south west). 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.

Protected species

Natural England has produced [standing advice](#)² 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

Sites of Special Scientific Interest

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

In addition, Natural England would advise on the following issues.

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

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 07768 237040.

Should the proposal change, please consult us again.

Yours faithfully

Sam Kench
Norfolk and Suffolk Team

² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Annex A: 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.*

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](#)³. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Environmental enhancement

Development provides opportunities to secure 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:

³<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

- 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 98 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, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

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](#).



**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/20/05046

Our Ref: IESCCG/001120/NEE

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

26/11/2020

Dear Sirs, Madam

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, 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 279 residential dwellings which is not part of the Joint Local Plan, 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. The CCG and other health partners have worked with Babergh and Mid Suffolk District Councils Infrastructure Team on the IDP for all known developments in the local plan, this not being part of the local plan means this development is not accounted for. 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).

In addition to a primary healthcare response, the proposed development is likely to have an impact on other health and social care system providers that have been consulted as part of this healthcare impact assessment. This incorporates responses from:

- East Suffolk & North East Essex Foundation Trust
- Norfolk & Suffolk Foundation Trust (Mental Health)
- East of England Ambulance Service NHS Trust

Review of Planning Application

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

Healthcare 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
Needham Market Country Practice	12,784	536.75	8,631	-340
Total	12,784	536.75	8,631	-340

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 Needham Market Country 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.

9. Ipswich and East Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Position Statement produced by Babergh and Mid Suffolk District Councils

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

Jane Taylor

Senior Estates Development Manager

Ipswich and East Suffolk Clinical Commissioning Group



Planning Applications – Suggested Informative Statements and Conditions Report

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

AW Site Reference: 166343/1/0108280

Local Planning Authority: Mid Suffolk District

Site: Land On The North West Side Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access

Planning application: DC/20/05046

Prepared by: Pre-Development Team

Date: 18 November 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 Needham Market Water Recycling Centre that will have available capacity for these flows

Section 3 - Used Water Network

This response has been based on the following submitted documents: Flood Risk Assessment & Site Strategy dated November 2018. Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. The site strategy indicates that a pumped solution is required to drain the foul water flows from the development however, further information including the proposed peak pumped rate have not been detailed. We therefore request a condition requiring an on-site drainage strategy. (1) **INFORMATIVE** - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) **INFORMATIVE** - 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. (3) **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. (4) **INFORMATIVE**: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

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

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

Section 5 - Suggested Planning Conditions

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

Used Water Sewerage Network (Section 3)

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

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

Next steps

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

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

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

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

Foul water:

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

Our Ref: 20_03438_P
Your Ref: DC/20/05046

16th November 2020

Dear Sir/Madam

RE: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access at Land On The North West Side Of Barking Road Needham Market Suffolk.

The site is near to the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). Maps are available on the Board's webpages showing the Internal Drainage District (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf) as well as the wider watershed catchment (https://www.wlma.org.uk/uploads/ESIDB_Watershed.pdf).

I note that the applicant intends to discharge surface water to a watercourse within the watershed catchment of the Board's IDD. We request that this discharge is facilitated in line with [the Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Kind Regards,

Emma

Emma Robertson
Sustainable Development Officer
Water Management Alliance



Jane Marson (Chairman) Michael Paul (Vice-Chairman)
Phil Camamile (Chief Executive)



Cert No. GB11990

Cert No. GB11991



Historic England

Ms Jasmine Whyard
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582718

Our ref: **W:** P01306730

17 November 2020

Dear Ms Whyard

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

**LAND NORTH WEST OF BARKING ROAD, NEEDHAM MARKET, SUFFOLK
Application No. DC/20/05046**

Thank you for your letter of 11 November 2020 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

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

Yours sincerely

Andrew Northfield

Andrew Northfield
Business Officer
E-mail: andrew.northfield@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Your Ref:DC/20/05046
Our Ref: SCC/CON/4561/20
Date: 2 December 2020



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Jasmine Whyard

Dear Jasmine,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/05046

PROPOSAL: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

LOCATION: Land On The North West Side Of, Barking Road Needham Market Suffolk

ROAD CLASS:

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

A residential development in Suffolk over 100 dwellings, a Travel Plan must be submitted that provides some overarch with the highway mitigation measures identified in the Transport Assessment (dated February 2019). The submission of a Travel Plan is required under paragraphs 108, 110 and 111 of the NPPF and the "Travel Plans, Transport Assessments and Statements" section of the 2014 MHCLG Planning Practice Guidance. This is in addition to the fact that both Mid-Suffolk District Council and Suffolk County Council have declared Climate Emergencies that support the need for providing a strong package of sustainable transport measures. If the Applicant continues to challenge the need for a Travel Plan for this site, Suffolk County Council will have no issues with defending this requirement at any subsequent planning appeal if needed.

The Travel Plan that needs to be submitted in accordance with the Suffolk Travel Plan Guidance (<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>) and include strong measures to encourage the residents to travel by sustainable and active modes of transport. Suffolk County Council will expect measures in the Travel Plan that provide residents detailed sustainable travel information through travel information packs, with a multi-modal voucher to the value of two one month bus tickets per dwelling, with further marketing measures to encourage sustainable travel through social media or newsletters following on from the delivery of the travel information packs. The Travel Plan must also include strong commitments to engage with the catchment primary and secondary schools following the success of this measure on other Travel Plan sites in Suffolk.

The Travel Plan and Transport Assessment will also need to demonstrate if further sustainable measures can be identified secured in accordance with the requirements of paragraph 108 of the NPPF, as the existing bus services in the immediate area are not suitable for commuting purposes. It is over a 700m walk from the edge of the site to the nearest bus stop that has frequent bus services (First 88). Evidence of discussions with the local bus operators to investigate any potential improvements to the public transport links must be incorporated into the Travel Plan.

If a suitable Travel Plan can be submitted, Suffolk County Council would be willing to take on the delivery of the Travel Plan on behalf of the developer if a Travel Plan Contribution of £107,965 (£386.97 per dwelling) is secured through a Section 106 agreement. This will need to be agreed in writing by the Applicant before the application can be determined. If this cannot be agreed a suitable planning condition with a £1,000 per annum Travel Plan Evaluation and Support Section 106 contribution will need to be made payable to Suffolk County Council for a minimum of five years, or one year after occupation of the final dwelling (whichever is the longest duration). This will need to be required to ensure Suffolk County Council can provide the officer time to oversee the delivery of the Travel Plan, as this is a discretionary function and chargeable under section 93 of the 2003 Local Government Act and section 3 of the 2011 Localism Act.

The proposed access is on the extent of the 30mph speed limit. The developer is suggesting extending the speed limit by 24m. We recommend the limit is extended approximately 100m to ensure the development frontage is within the speed limit.

On receipt of the required documents, we will be able to respond to this application in full.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

Your Ref:DC/20/05046
Our Ref: SCC/CON/4561/20
Date: 15 December 2020



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Jasmine Whyard

Dear Jasmine

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/05046

PROPOSAL: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

LOCATION: Land On The North West Side Of, Barking Road Needham Market Suffolk

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

Further to SCC highways response on this application, SCC has carried out further investigation into the site following comments raised by the planner.

Access

As previously mentioned, the site is only providing a single access into the site. This is unacceptable for a development with over 150 dwellings. It has been highlighted that the access point is within the medium flood zone. In the event Barking Road flooding at this access point, there will be no vehicular access for the site. We have a history of customer complaints on file where the road has flooded in the past and vehicles were unable to pass. Therefore, there needs to be 2 permanent points of access; one of which is not in the floodplain. We cannot accept a single access with an emergency access point for this site due to the flooding issue.

It is unclear the development has vehicular rights of way for the proposed emergency access onto Bridleway 15 along the Drift to allow access to Quinton Road. Full details are required on this proposal (how the bridleway is affected including design, dimensions etc).

Highway Capacity

The Transport Assessment (TA) document supporting this application assessed the junctions within Needham Market by applying the trips from the development to the existing highway layout, the Ratio of Flow to Capacity (RFC) and Queue lengths (Q) were calculated on the key junctions for future year 2024. By using the computer Model PICADY, these predictions can be calculated for the AM and PM

Peak Hours at junctions. Note If the RFC value is 0.85 or less, this indicates the junction is nearing but operating within capacity, 1 being at capacity and more than 1, over capacity.

- Table 10 gives the PICADY results for B1113/Grinstead Hill/Lion Lane junction and predicts the RFC for the future year to be 0.7 in the AM peak hour which is within theoretical capacity.
- Table 11 indicates The B1113/B1078 Barking Road junction shows the RFC during the PM peak as 0.83. Again, this is within the theoretical capacity. However, the TA does not indicate the BMSDC's emerging Joint Local Plan has been included in the junction modelling.

Pedestrian and Cycle Links

A concern has been raised regarding the footway links from the site into Needham Market. We can confirm that Drawing No 1901-305-SK01 (on Page 35 of the Transport Assessment) indicates a proposal to construct a short section shared cycle/footway 3m wide along the northern frontage of the site then a 1.8m wide footway adjacent to Needham Market Country Practice. These will link the site to the footway to the shops on Barking Road and beyond. This is an acceptable proposal to create a continuous link for the pedestrian. However, the following points need to be addressed:

- It is noted the existing footway widths vary on Barking Road; between approximately 1.2m and 1.8m. Manual for Streets (MfS) indicate the minimum unobstructed width for pedestrians should be 2m. It also states, 'Additional width should be considered between the footway and a heavily used carriageway'. MfS Also states 'Footway widths can be varied between different streets to take account of pedestrian volumes and composition'. Volumes of pedestrians will vary throughout the day along this stretch of footway and the existing widths could be appropriate for the expected pedestrian flows. It should be noted that Barking Road is on the B1078 and part of the Strategic highway network and SCC has received complaints regarding the speeds of vehicles along this road, so the pedestrian is at risk from fast moving vehicles.
- Local Transport Note 1/20 was published in July of this year where 'cycling will play a far bigger part in our transport system from now on'. It also states 'This updated national guidance for highway authorities and designers aims to help cycling become a form of mass transit in many more places. Cycling must no longer be treated as marginal, or an afterthought'.

We recommend the applicant investigates on how they can provide wider footways along Barking Road and outline their proposal on how they envisage introducing provisions for the cyclist.

We note the developer is proposing to link to the Bridleway to the north of the site which links to the footway network off Quinton Road and onto the Primary School; we consider this is a safe route for the vulnerable pedestrian.

There is insufficient evidence to show that any mitigation proposal would adequately address the severe impact from the above points. For this reason, SCC would recommend that planning permission is refused on highway grounds. Should further improvements be proposed to adequately address the highway safety matters, we would be happy to re-consider our position on the proposal.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your ref: DC/20/05046
 Our ref: 60097
 Date: 27 November 2020
 Enquiries to: Peter Freer
 Tel: 01473 264801
 Email: peter.freer@suffolk.gov.uk

By e-mail only:
planningblue@babberghmidsuffolk.gov.uk

FAO Jasmine Whyard

Dear Jasmine,

Re: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279 No dwellings (including 100 affordable dwellings) and access. Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Summary Table – CIL contributions

The table below would form the basis of a future bid to the District Council for CIL funds if planning permission is granted and implemented.

Service Requirement	Contribution per dwelling	Capital Contribution
Education - Primary	£4,146.80	£1,156,956.00
Education – Secondary	£4,090.32	£1,141,200.00
Education – Sixth Form	£852.15	£237,750.00
Libraries	£216.00	£60,264.00
Waste	£136.00	£37,944.00
Total	£9,441.27	£2,634,114.00

Summary Table – S106 contributions

The table below should be secured by a planning obligation if planning permission is to be granted. Justification is identified in the proceeding sections of this letter. Please see section 13 for SCC's monitoring fee.

Service Requirement	Contribution per dwelling	Capital Contribution
New Early Years Setting build cost	£1,837.63	£512,700.00
Early Years land		£1
Secondary school transport contribution	£1,036.56	£289,200.00
Total	£2,874.19	£801,901.00

The National Planning Policy Framework (NPPF) paragraph 56 sets out the requirements

of planning obligations, which are that they must be:

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

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 District Council is out for consultation from the 12th November with its pre-submission [Local Plan](#) which will need to be considered and this site is not proposed to be allocated.

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

Mid Suffolk District Council have produced a position statement for the area which includes a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. This will be superseded by the Infrastructure Funding Statement to be published 31st December 2020. The current position statement is dated 1st September 2019. This will be superseded by the district's Infrastructure Funding Statement.

The county council and the District Council have a shared approach to calculating infrastructure needs, in the adopted [Developers Guide to Infrastructure Contributions in Suffolk](#).

The details of the impact on local infrastructure serving the development is set out below and will form the basis of developer contributions 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 temporary education needs where relevant, such as temporary school provision and any associated school transport costs before a permanent new school opens within a development site."

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

SCC would anticipate the following minimum pupil yields from this development based on the indicative housing mix:

School level	Minimum pupil yield:	Required:	Cost per place £ (2020):
Primary school	67	67	17,268

age range, 5-11:			
Secondary school age range, 11-16:	48	48	23,775
Secondary school age range, 16+:	10	10	23,775

Total education contributions:	£2,535,906.00
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The local catchment schools are Bosmere County Primary School, and Stowmarket High School.

Primary School

The strategy at primary school level is to expand the existing school up to 420-places. At the secondary school level, construction work started on site during the October half term 2018, with phase one due to complete around Easter 2020; the second phase is the demolition of the existing building which should be completed by the summer holidays 2020.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for primary schools is £17,268 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£17,268 / 1.00) produces a total of £17,268 per pupil for permanent expansion of primary schools.

Secondary School/Sixth Form

The strategy at the secondary school level is to expand the existing school in the future after the recent EFA building project is completed.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775 / 1) produces a total of £23,775 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”.

Secondary School – transport contributions

SCC require secondary school transport S106 contributions as the development is

over 3 miles walking distance to the nearest Secondary School. This is an additional cost to SCC as the development is not located within statutory walking distance of a Secondary School and SCC will have responsibilities to provide 'free' home to school transport for secondary pupils on an ongoing basis for the life of the development.

Our approach to school transport cost is directly related to the number of children likely to be living in the dwellings and is set out in the final section on page 2 of the "[update on developer contribution costs for early years and education](#)", published on the SCC Developers Guide to Infrastructure Contributions in Suffolk webpage. On average the current cost (May 2020) of transporting a school pupil from home to school is £6.34 per day (return) or £1,205 per annum. The calculation of school transport contributions is based on 190 days per year over 5 years for secondary school pupils.

48 secondary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Therefore, contributions of £1,205 x 48 pupils x 5 years = £289,200, increased by the RPI. Contribution held for a minimum period of 10 years from date of the final dwelling occupation. The contribution will be used for secondary school transport costs.

The securing of a School Transport Contribution by the approaches as set out above have been confirmed in appeal decisions, as a matter of principle, to be compliant with Regulation 122 of the CIL Regulations. Decision examples include (Planning Inspectorate 7 digit case reference numbers): 3179674, 3161733, 3182192, and 3173352.

- 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'

Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare.

This proposed development is in the Bosmere ward, where there is an existing deficit of places. Existing provision is unable to be expanded to provide the number of places arising from the development as well as undetermined applications in the

ward.

As per the [Developers Guide to Infrastructure Contributions in Suffolk](#), where a development proposal is anticipated to create over 20 FTE places, then a new provision should be secured. This will include the land and the construction of suitable premises for a new provision.

In paragraph 16 of the DfE guidance it says, “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 strategy for early years’ provision would be to provide a new on-site setting.

- It is forecast that up to 44 children ages 2 – 4 will arise, which is the equivalent to 25 FTE places based on one place being 30 hours per week.
- Due to the number of developments emerging in the ward the existing settings are unable to expand to cater for these places arising and the existing deficit.
- A site area large enough to deliver a 60 place setting will be required to futureproof the setting so a minimum site area of 0.1 hectares. It is proposed that a land reservation is secured within the planning obligation for a flat, fully-serviced and free of contamination site to be transferred to SCC for £1 – the exact location to be identified at the reserved matters stage after consideration has been given to any constraints. Land to be used for early years purposes and transferred to SCC prior to first dwelling occupation.
- Planning obligation – financial contribution of £1,837.63 per dwelling for SCC to use towards the delivery of a new early years setting for Needham Market, plus freehold transfer of a fully-serviced site of minimum size 0.1 ha to SCC for £1.

From this development proposal SCC would anticipate the following pre-school places arising:

	Minimum number of eligible children:	Required:	Cost per place £ (2020):
Pre-School age range, 2-4:	25	25	20,508

Required pre-school contributions:	£512,700.00
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3. **Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
4. **Transport issues.** Refer to the NPPF 'Section 9 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Samantha Harvey will coordinate this.

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, 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 (3 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

This equals a cost of £216.00 per dwelling for the support of improving services and outreach at Needham Market Library.

Libraries contribution:	£60,264.00
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6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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.

A contribution will be required through the Community Infrastructure Levy towards the relocation of Stowmarket Recycling Centre, which serves this development at £136 / dwelling. A contribution as set out below is required from the proposed development.

Waste contribution:	£37,944.00
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- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

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. 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.

10. High-speed 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.

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

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

13. Monitoring fee. The CIL Regs allow for charging of monitoring fees. In this respect the county council charges **£412** for each trigger point in a planning obligation, payable upon commencement.

14. Future CIL Bids. The above infrastructure identified as CIL funded, as opposed to those identified for s106 contributions, will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented. Applications for CIL funding will use the latest cost multipliers at the time of bidding. CIL cuts the link from the development to the infrastructure and it's important to remember that some areas of the district will generate a lot of CIL but will have little infrastructure to deliver due to capacity, so the pot should be seen as district wide rather than little pots covering each development area.

Yours sincerely,

PJ Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer

2020-11-17 JS Reply Land On The North West Side Of, Barking Road, Needham Market Ref DC/20/05046

Dear Jasmine Whyard,

Subject: Land On The North West Side Of, Barking Road, Needham Market Ref DC/20/05046

Suffolk County Council, Flood and Water Management have reviewed application ref DC/20/05046.

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

- Flood Risk Assessment and Drainage Strategy Ref EX1807704
- Needham Market Site Location Plan Ref 043-18-0150 P1
- Needham Market Masterplan Ref043-18-0200 P2

Document Submitted	Document Description	Outline
Flood Risk Assessment (FZ3 or Site >1Ha)	Evaluation of flood risk (fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)	✓
Drainage Strategy/Statement (less detail required for Outline)	Document that explains how the site is to be drained using SuDS principles. Shall include information on:- <ul style="list-style-type: none"> • Existing drainage (inc adjacent roads) • Impermeable Area (Pre and Post Development) • Proposed SuDS • Hydraulic Calculations (see below) • Treatment Design (i.e. interception, pollution indices) • Adoption/Maintenance Details • Exceedance Paths 	✓
Contour Plan	Assessment of topography/flow paths/blue corridors	✓
Impermeable Areas Plan	Plan to illustrate new impervious surfaces	✓
Preliminary Layout Drawings (including landscaping details)	Indicative drawings of layout, properties, open space and drainage infrastructure including:- <ul style="list-style-type: none"> • Discharge location (outfall) • Conveyance network • Form of SuDS and location on the site 	✓
Preliminary Site Investigation Report	3 or more trial pits to BRE 365 and associated exploratory logs (check for groundwater)	✓
Preliminary hydraulic calculations	<ul style="list-style-type: none"> • Discharge Rates (using suitable method i.e. FEH, IH124 (ICPSUDS) or modified rational method (brownfield sites) • Storage Volume • Long Term Storage (if required) 	✓

Evidence of any third party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner)	Evidence of any permissions or permits being obtained.	✓
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The reason why we are recommending a holding objection is because the submitted information relating to flood risk and surface water drainage needs to be updated to reflect changes to national and local policy.

Also the predicted flood maps will need to be checked and amended as necessary as new data was released in January 2020 to flood risk mapping.

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

1. Update the Flood Risk Assessment and Drainage Strategy Ref EX1807704 as necessary for changes to
 - a. national, local policy/guidance
 - b. predicted flood risk maps
 - c. reduction in the proposed development and proposed development layout/masterplan
 - d. updated hydraulic calculation
2. Ensure the following documents have been provided;
- 3.

Kind Regards

Jason Skilton
 Flood & Water Engineer
 Suffolk County Council
 Growth, Highway & Infrastructure
 Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

From: GHI PROW Planning <PROWplanning@suffolk.gov.uk>

Sent: 17 November 2020 10:27

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

Cc: David Falk <david.falk@suffolk.gov.uk>; Kevin Verlander <Kevin.Verlander@suffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/20/05046 (Land north-west of Barking Rd, Needham Mkt)

PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE

REF: Land north-west of Barking Road, Needham Market – DC/20/05046

Thank you for your consultation concerning the above application.

The proposed site itself does not contain any public rights of way (PROW), however Bridleway 15 Needham Market runs outside the northern edge of the site. The Definitive Map for Needham Market can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Needham-Market.pdf>. A more detailed plot of public rights of way can be provided. Please contact DefinitiveMaps@suffolk.gov.uk for more information. Note, there is a fee for this service.

We accept this proposal in principle, however we would like to see a pedestrian / cycle link from the north-eastern corner of the site onto BR15. This would allow sustainable access to the library, community centre and on into town. It is likely there will be a requirement to enhance the PROW network relating to this development, and if this is the case, a separate response will contain any further information.

The Applicant MUST take the following into account:

1. PROW are divided into the following classifications:
 - Public Footpath – only for use on foot or with a mobility vehicle
 - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
 - Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage
 - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact DefinitiveMaps@suffolk.gov.uk.

2. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of

any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

3. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It **DOES NOT** give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
 - To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
 - To discuss applying for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
 - To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
4. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
5. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/

Thank you for taking the time to consider this response.

Public Rights of Way Team

Growth, Highways and Infrastructure
Suffolk County Council
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP
PROWplanning@suffolk.gov.uk

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

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>
Sent: 11 November 2020 16:38
To: GHI PROW Planning <PROWplanning@suffolk.gov.uk>
Subject: MSDC Planning Consultation Request - DC/20/05046 (Land north-west of Barking Rd, Needham Mkt)

Please find attached planning consultation request letter relating to planning application - DC/20/05046 - Land On The North West Side Of, Barking Road, Needham Market, 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: GHI PROW Planning <PROWplanning@suffolk.gov.uk>
Sent: 29 January 2021 18:31
To: Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>
Cc: Sam Harvey <Sam.Harvey@suffolk.gov.uk>; David Falk <david.falk@suffolk.gov.uk>
Subject: RE: Application - Needham Market, land on the North West side of Barking Road IP6 8JF

Hi Jasmine

We would not support use of Bridleway 15 Needham Market (The Drift) as an emergency access to / from the proposed development site. The point where the Applicant is proposing to bring the access out is currently unsurfaced and slopes steeply upwards. We do not feel that they will be able to get enough width to make a safe access / egress point, even if it's just for emergencies. The section at the north-eastern corner of the site is currently surfaced as it appears to be used by the football club, but the bridleway section is only 5 metres wide. In addition, the section of road that the bridleway connects to is only about 4 metres wide. This route is not suitable to be used as an emergency access that could see hundreds of journeys in the event that the Barking Road access is unusable. Even if the muddy section of BR15 was to be surfaced, in our view it is not wide enough, and use as an access would significantly interfere and potentially endanger, other users of the bridleway. We would also question how use of BR15 is going to be restricted to emergencies only. Unless there is some sort of barrier there, we have a concern it would just be used as a normal access by people living at that end of the development. In light of the above, we would strongly support a refusal recommendation.

Kind regards

Alex

Alexandra Maher
Green Access Officer

Rights of Way and Access Team
Suffolk County Council
Phoenix House, 3 Goddard Road, Ipswich, IP1 5NP
Tel: 01473 264769
Mobile: 07543 237698

www.suffolk.gov.uk

www.discoversuffolk.org.uk

www.facebook.com/DiscoverSuffolk

www.twitter.com/DiscoverSuffolk

www.instagram.com/DiscoverSuffolk



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/F216294
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 13/11/2020

Dear Sirs

Land on the North West side of Barking Road, Needham Market
Planning Application No: DC/20/05046/OUT
A CONDITION IS REQUIRED FOR FIRE HYDRANTS
(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), 2019 Edition, 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, 2019 Edition.

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.

/continued

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 or appointed Approved Inspector 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: jason@parkerplanningservices.co.uk

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: Water Officer
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 13 November 2020

Planning Ref: DC/20/05046/OUT

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land on North West side of Barking Road, Needham Market
DESCRIPTION: 279 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

Water Officer

Suffolk Fire and Rescue Service

OFFICIAL

Created: September 2015

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



Dear Sir/Madam

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

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

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

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

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

Dispelling the Myths of Automatic Fire Sprinklers

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

Promoting the Benefits of Automatic Fire Sprinklers

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.
- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.

OFFICIAL

- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

The Next Step

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

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

Suffolk Fire and Rescue Service

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

Residential Sprinkler Association

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

British Automatic Fire Sprinkler Association

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

Fire Protection Association

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

Business Sprinkler Alliance

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

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

Yours faithfully

Chief Fire Officer
Suffolk Fire and Rescue Service

Hi Jasmine,

Thank you for consulting Suffolk Minerals and Waste Planning department on application DC/20/05046.

This proposal sits within the Minerals Safeguarding Area, outlined in Policy MP10: Minerals consultation and safeguarding areas and associated maps.

This Proposal is also 16.48 Ha which is above the 5Ha threshold for safeguarded areas as outlined in Policy MP10: Minerals Consultation and safeguarding areas.

For this development we would ask that a 'Borehole and grading analysis' be carried out on the site, if material is found on site and it is deemed to be economical viable for extraction we would ask this material is extracted prior to commencement.

If some material is found and it is economically viable for use within the project we would ask for the material to be used on site in the proposed development.

Please do give me a call if you need to discuss further.

Kind Regards

Ross Walker.

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: 2020_05046
Date: 12th November 2020

For the Attention of Jasmine Whyard

Dear Mr Isbell

Planning Application DC/20/05046 – Land on the north west side of Barking Road, Needham Market: Archaeology

This large proposal affects an area of high potential recorded in the County Historic Environment Record. Within the site itself, finds scatters dating from the Bronze Age to the post-medieval period have been recorded. Low-level evaluation in the southern part of the field has identified post medieval features relating to the remains of Sprites Hall, shown on historic maps to have once stood within this site, and also a number of prehistoric features (NDM 042). Surrounding the proposed development area, significant scatters of multi-period finds have also been recorded (BRK 043, 044, 045, 046, 088 and 105), as well as a pit containing Roman building material (BRK 106). As a result there is very high potential to encounter further archaeological remains at this location and the proposed development will involve groundworks which will damage or destroy surviving archaeology.

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, a second phase of archaeological evaluation (consisting of geophysical survey and trial trenching of the northern part of the application area, as well as further trenching in the southern part of the application area) is required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

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

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

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

To: Jasmine Whyard - Planning Officer

From: Louise Barker – Acting Strategic Housing Team Manager

Date: 7th December 2020

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land on The North West Side Of, Barking Road, Needham Market, Suffolk

Key Points

1. Background Information

This is a major development proposal for 279 residential dwellings. This application triggers the requirement for an affordable housing contribution of 35% under local policy.

This equates to 97.65 affordable dwellings. The scheme proposes 100 affordable dwellings.

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 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.

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

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

3. Proposed Mix for Open Market homes.

3.1 Detail has been provided on the housing mix which is shown in the accommodation plan 043-18-0300. Whilst it provides a broad range of house types and bedroom sizes, the current proposals for 112 x 3 bedrooms and 26 x 2 bedroom is not acceptable and needs further consideration to take account of the above information in the table below from the Ipswich Housing Market Area - Strategic Housing Market Assessment (updated 2019) page 37 produced by Peter Brett Associates.

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. The number of 3 bedrooms should be reduced and the 2 bedrooms increased. Smaller homes are more affordable for first time buyers and suitable for those wishing to downsize. Furthermore it would be useful to understand how the housing mix has been determined. A meeting with the agent/applicant would be useful to discuss the above points.

4. Preferred mix for Affordable Housing

4.1 The accommodation plan shows 100 of the proposed dwellings on the development are offered for affordable housing. Policy requirement is for 35% which equates to 97.65. The affordable housing on this site would be for district wide need. The current registered housing need shows the majority of homes required are 1 and 2 beds with a smaller need for 3+ bedrooms.

The affordable housing is offered as:

1 bed flat x 6
2 bed flat x 12
2bed bungalow x 12
3 bed bungalow x 7
2 bed x 38
3 bed x 21
4bed x 4

4.2 The above mix is broadly acceptable, but we require further clarification on size, number of occupants and tenure. We recommend 75% affordable rent and 25% shared ownership. We also require confirmation that the homes meet NDSS.

4.3 The layout proposes the affordable homes to be 'pepper potted' throughout the development which is acceptable.

4.4 We would expect to see level access showers in any ground floor flatted accommodation and the affordable homes built in accordance with Building Regulations Part M 'Category M4(2)' standard.

5. Other requirements for affordable homes:

- Properties must be built to current Homes England requirements and meet the NDSS requirements.
- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 100% of relets.
- The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings.
- All flats must be in separate blocks and capable of freehold transfer to an RP.
- Adequate parking and cycle storage provision is made for the affordable housing units.

Summary:

We are broadly supportive of the affordable housing mix but require further clarification as stated above. We do not support the open market mix as proposed and recommend a change to the numbers of 2 and 3 beds as described above.

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 01 December 2020 08:50
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
Subject: DC/20/05046. Air Quality

Dear Jasmine

EP Reference : 283706
DC/20/05046. Air Quality
Land On The North West Side Of, Barking Road, Needham Market, IPSWICH, Suffolk.
Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. Erection of 279No dwellings (including 100 affordable dwellings) and access.

Many thanks for your request for comments in relation to the above application. I can confirm that based on the scale of the development it would be reasonable to expect that the development would be accompanied by an air quality impact assessment. The scale of the development at 279 dwellings is likely to generate more than 500 vehicle movements a day which is indicative of the need for a screening assessment when placed against guidance from the Institute of Air Quality Management. Currently the development has not demonstrated that the impact is reasonable and/or manageable. For this development I would expect that the applicant demonstrates that the increased vehicle movements will not significantly impact on air quality within Needham High Street and key junctions around the town – I would also expect that the the applicant should demonstrate that the additional vehicle movements do not add to the queues at the width restricted bridge under the Norwich-London mainline resulting in queuing traffic and resultant impacts on air quality. I would raise a holding objection until such time that the applicant demonstrates that the impact of the development is acceptable and/or manageable.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 27 November 2020 08:57
To: Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Subject: DC/20/05046. Land Contamination

Dear Jasmine

EP Reference : 283707

DC/20/05046. Land Contamination

Land On The North West Side Of, Barking Road, Needham Market, IPSWICH, Suffolk.

Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. Erection of 279No dwellings (including 100 affordable dwellings) and access.

Many thanks for your request for comments in relation to the above application. Having reviewed the application and supporting Phase I report by RSA Geotechnics (reference ; 1433351 – Report, AJH, PAG, LHA – 13-01-16 Ver.1) 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@babberghmidsuffolk.gov.uk

Work: 01449 724715

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

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



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: Peter Chisnall <Peter.Chisnall@babberghmidsuffolk.gov.uk>
Sent: 26 November 2020 21:37
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/20/05046

Dear Jasmine,

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Many thanks for your request to comment on the sustainability/Climate Change aspects of this application.

It is acknowledged that the application is for outline permission however some consideration of this topic area is expected at this stage.

Babergh and Mid Suffolk Councils declared a Climate Emergency in 2019 and have an aspiration to be Carbon Neutral by 2030, this will include encouraging activities, developments and organisations in the district to adopt a similar policy. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability, taking into account the requirements to mitigate and adapt to future climate change.

I raise no objections to this application. If the planning department decided to set conditions on the application, I would recommend the following.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

The Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) 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).

For developments constructed with levels of insulation to just equal or slightly better the current building regulations' Part L requirements it is likely that they will need to be retrofitted within a few years to meet the National milestones and targets leading up to zero carbon emissions by 2050.

The Sustainability and Energy Strategy requires the applicant to indicate the retrofit measures and to include an estimate of the retrofit costs for the properties on the development to achieve net Zero Carbon emissions by 2050. It is also to include the percentage uplift to building cost if those measures are included now at the initial building stage.

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.

Details as to the provision for electric vehicles should also be included please see the Suffolk Guidance for Parking, published on the SCC website on the link below:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmentalmanagement/planningrequirements/>

Regards,

Peter

Peter Chisnall, CEnv, MIEMA, CEnvH, MCIEH
Environmental Management Officer

From: Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>

Sent: 18 November 2020 14:17

To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Subject: DC/20/05046

WK 283709

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Thank you for consulting me on this application. Environmental Protection have no objections in principle. However, demolition and construction activities have the potential to cause an adverse impact on existing residential and commercial units in the vicinity please add the following conditions:

1. The hours of operation on site shall be limited to:
Monday to Friday: 08:00 to 18:00
Saturday: 08:00 to 13:00
Bank or Public Holidays: NO onsite work permitted.
2. Prior to the commencement of the development, including any demolition or site preparation works, a Construction Method Statement (CMS) shall be submitted in writing for approval. The CMS shall incorporate the following details
 - a) Details of noise and vibration control for plant and operations including monitoring on site
 - b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.
 - c) Details of how construction and worker traffic and parking shall be managed.
 - d) Details of any protection measures for footpaths surrounding the site.
 - e) Details of any means of access to the site during construction.
 - f) Details of the scheduled timing/phasing of development for the overall construction period.
 - g) Details of dust control and any wheel washing to be undertaken, management and location it is intended to take place.
 - h) Details of any lighting, including position and luminance/direction.
 - i) Details of the siting of any on site compounds and portaloos.
 - j) Haul routes for construction traffic on the highway network.
 - k) Monitoring and review mechanisms.The construction shall at all times be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Andy

Andy Rutson-Edwards, MCIEH AMIOA

Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724727

From: Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>

Sent: 20 November 2020 15:46

To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Subject: FW: DC/20/05046 further comments

WK 283709

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be

considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Thank you for consulting me on this application. Environmental Protection have further comments to make in addition to those I submitted on 18/11/2020

Due to the location of the nearby football ground and training area, I shall require an Environmental Noise Assessment to be undertaken by a suitably qualified acoustic consultant with an agreed method . This assessment will need to take into consideration all the activities of the football club site. E.g. any licensed activities permitted in addition to those on the field and all weather 3G training pitch. I recommend that this assessment and report is undertaken and any Environmental Protection re consulted on this application prior to the determination of this application.

The existing lighting in use at the adjacent football ground shall also be assessed as this to ensure that any new residents in the proposed development are not affected by the current lighting.

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

Sent: 18 November 2020 14:17

To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Subject: DC/20/05046

WK 283709

Environmental Health -
Noise/Odour/Light/Smoke

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/05046

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Location: Land On The North West Side Of, Barking Road, Needham Market, Suffolk

Thank you for consulting me on this application. Environmental Protection have no objections in principle. However, demolition and construction activities have the potential to cause an adverse impact on existing residential and commercial units in the vicinity please add the following conditions:

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Monday to Friday: 08:00 to 18:00
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2. Prior to the commencement of the development, including any demolition or site preparation works, a Construction Method Statement (CMS) shall be submitted in writing for approval. The CMS shall incorporate the following details
 - a) Details of noise and vibration control for plant and operations including monitoring on site
 - b) Details of the storage of construction materials on site, including details of their siting and maximum storage height.
 - c) Details of how construction and worker traffic and parking shall be managed.
 - d) Details of any protection measures for footpaths surrounding the site.
 - e) Details of any means of access to the site during construction.
 - f) Details of the scheduled timing/phasing of development for the overall construction period.
 - g) Details of dust control and any wheel washing to be undertaken, management and location it is intended to take place.
 - h) Details of any lighting, including position and luminance/direction.
 - i) Details of the siting of any on site compounds and portaloos.
 - j) Haul routes for construction traffic on the highway network.
 - k) Monitoring and review mechanisms.

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

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

Consultation Response Pro forma

1	Application Number	DC/20/05046	
2	Date of Response		
3	Responding Officer	Name:	James Fadeyi
		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>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.</p> <div style="text-align: center;">  ELITE 6 - 8x4MS (Mid Steer) Wide Track Dat </div> <p>See the latest waste guidance on new developments.</p> <div style="text-align: center;">  SWP Waste Guidance v.21.docx </div> <hr style="width: 20%; margin: 10px auto;"/> <p>The road surface and construction must be suitable for an RCV to drive on.</p> <p>To provide scale drawing of site to ensure that access around the development is suitable for refuse collection vehicles.</p> <p>Please provide plans with each of the properties bin presentations plotted, these should be at edge of the curtilage or at the end of private drive and there are suitable collection presentation points. These are required for approval.</p>	

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

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.

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

From: BMSDC Public Realm Consultation Mailbox

<consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 18 November 2020 16:05

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

Subject: RE: MSDC Planning Consultation Request - DC/20/05046

Public Realm Officers have no objections to this development as shown on the plans. There are generous areas of public open space indicated within the development and opportunities to enhance these for recreational use and biodiversity. It would be expected that formal play areas are included in the detailed designs and we would welcome the opportunity to provide further comments at the detailed planning stage

Regards

Dave Hughes

Public Realm Officer

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

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 11 November 2020 16:37

To: BMSDC Public Realm Consultation Mailbox

<consultpublicrealm@baberghmidsuffolk.gov.uk>

Subject: MSDC Planning Consultation Request - DC/20/05046

Please find attached planning consultation request letter relating to planning application - DC/20/05046 - Land On The North West Side Of, Barking Road, Needham Market, 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.

Planning Application – Consultation Response

Planning Application Reference:	DC/20/05046
Site:	Land on The North West Side of Barking Road, Needham Market, Suffolk
Proposal:	Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	22/12/2020

1. Policy position

The proposed development site is not part of the planned growth of the Pre-Submission Regulation 19 Babergh and Mid Suffolk Joint Local Plan (November 2020).

The NPPF section on Determining Applications, Paragraph 47, states that '*Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.*' Paragraph 48 refers to the weight that Local planning authorities may give 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).*

The Babergh and Mid Suffolk Joint Local Plan has now reached the Pre-Submission Regulation 19 consultation until the 24th December 2020.

It should also be noted that the District has a positive 5 Year Housing Land Supply position.

The relevant Development Plan context to consider is:

- the National Planning Policy Framework (2019)
- the Pre-Submission Regulation 19 Babergh and Mid Suffolk Joint Local Plan (November 2020)
- the saved policies of the Mid Suffolk District Local Plan (1998)
- the First Alteration to the Mid Suffolk Local Plan (2006)
- the Mid Suffolk District Core Strategy Development Plan Document (2008)
- the Mid Suffolk District Core Strategy Focused Review (2012)

Further to the above, it is important to note that the Needham Market Neighbourhood Plan is currently at Regulation 16 Submission stage, with consultation between the 2nd December 2020 to the 27th January 2021. The submission version of the Neighbourhood Plan (October 2020) refers to the Babergh and Mid Suffolk Joint Local Plan for the planned growth identified for Needham Market, and does not propose the allocation of this site.

2. Infrastructure Delivery Plan (IDP) position

The IDP of September 2020 provides an updated position from the previous IDP of July 2019, and it sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 12th November 2020 as evidence which supports the Pre-Submission Regulation 19 Joint Local Plan. The IDP is an iterative document which is updated annually to reflect the changes in infrastructure capacities, requirements and priorities.

The proposed development is not part of the proposed site allocations of the Joint Local Plan and therefore there are no site-specific infrastructure needs set out for this site in the IDP. The infrastructure required to support it are assessed through the planning application consultation process.

For the purpose of this response, and to understand the impact on infrastructure capacity, the content of the IDP has been considered together with the existing planning commitments and responses from infrastructure providers.

Set out below are the current major residential planning applications and recent permissions (over 10 dwellings), and Joint Local Plan land allocations in the Needham Market area:

- 3153/14, Needham Chalks Ltd, Ipswich Road – Site under construction with permission for 266 dwellings.
- DC/19/02363/RES and 3679/13/OUT, Land West of Anderson Close Hill House Lane – Full permission for 38 dwellings
- DC/17/05549, Land North West of Hill House Lane – Outline permission for 66 dwellings. This site is part of the Joint Local Plan allocation LA030.
- DC/19/03729/RES and DC/18/02050/OUT, Land Accessed from Luff Meadow – Site under construction with permission for 28 dwellings.
- DC/18/05104, Former Mid Suffolk District Council Offices & Associated Land 131 High Street - Site recently under construction with permission for 94 dwellings. This site is part of the Joint Local Plan allocation LA032.
- DC/18/04811, Site at Needham Market Middle School, School Street - Site recently under construction with permission for 41 dwellings. This site is part of the Joint Local Plan allocation LA031.

Infrastructure considerations are:

- Education
For Early Years provision, the IDP refers to the planned growth and existing commitments and anticipated mitigation through expansion of existing facilities. However, this unplanned proposal is of the scale that would require a new on-site setting, as detailed in the County Council response of the 27/11/2020. This new setting would require Section 106 developer contributions towards the build costs and land (0.1ha) to be provided within the development site itself.

In terms of primary school education, the local catchment school is Bosmere County Primary. The IDP refers to Bosmere School in Needham Market as needing to expand from 315 to 360 places to provide for the committed and planned growth, and that it is able to expand to 420 places. As explained in the County Council response of the 27/11/2020, the strategy to provide for this unplanned growth would be to expand the primary school to 420 places, and a financial contribution towards the delivery of the primary school expansion in the form of CIL is required.

In terms of Secondary and Post 16 education, Stowmarket High School is the catchment school. Stowmarket High School recently benefited from an expansion however this unplanned growth would necessitate a further expansion, and consequently developer contributions are requested (in the form of CIL) from the County Council response of the 27/11/2020. A contribution towards the secondary school transport is also required, in the form of Section 106.

- Transport

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

The latest response of the 15/12/2020 from the County Council as Highway Authority is requiring two permanent access points, where one of these must not be within the floodplain. The County Council has made clear that this site cannot be accommodated by a main access point and an emergency access point.

In addition, the County Council is requiring further investigation for the provision of wider footways along Barking Road and provision for cyclists. Further to this requirement by the County Council, the Regulation 19 Pre-Submission Joint Local Plan policy LP32 concerning the strategy for Safe, Sustainable and Active Transport, also requires that all developments are to maximise the uptake in sustainable and active transport.

The severe impact of the issues raised above are such that the County Council has recommended that planning permission is refused on highway grounds.

- Health

The Needham Market Country Practice is adjacent to the proposed development site. As referred in the response from the Clinical Commissioning Group (CCG) of the 26/11/2020, this proposed growth has not been assessed for impact on health provision as part of the Infrastructure Delivery Plan and the Joint Local Plan policies. The CCG therefore expect that any impact will be mitigated through developer contributions which would need to be secured through CIL, to meet the cost of additional capital funding for health service provision arising. It is understood that the existing practice would not have the capacity to provide for this site, and therefore alternative provision would need to be looked at for the overall A14 corridor growth to find a suitable solution.

- Flood risk

The holding objection of the 01/12/2020 by the Environment Agency is of concern. The Environment Agency state that the majority of the site sits within Flood Zone 1, and that the South of the site is located in fluvial Flood Zones 2 & 3, medium & high probability zone. The submitted flood risk assessment of the planning application is not compliant with the latest national policy guidance and the Environment Agency are pointing to important matters that are the subject of their holding objection, such as the site access route which could be flooded to unknown depths, putting unacceptable risk to the health and safety of the occupants in a flood event, as well as the assessment of the impact of climate change using appropriate climate change allowances, and the impacts of fluvial flood risk.

- Waste

During the preparation of the IDP, Suffolk County Council who is responsible for the provision of Household Waste Recycling Centres (HWRC), has highlighted the needs and priorities for the Stowmarket catchment area. A new site for Stowmarket is to be identified by the County Council, for which developer contributions will be required towards this new provision. The IDP also refers to the developer contributions which

will be expected to fund this priority project, in the form of CIL. This is also reflected in the County Council response of the 27/11/2020.

- Libraries

The IDP refers to the need for libraries contributions from residential development as additional population will create additional demand for library services. Therefore, where capacity is not present at existing libraries, new development should make a contribution to the improvement and expansion of the existing library network, through the CIL process. This is reflected in the County Council response.

3. Summary

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

The proposed development site is contrary to paragraph 11 of NPPF. The development proposal does not accord with the adopted and emerging Development Plan policies and it should be noted that the District has a positive 5 Year Housing Land Supply position.

There is also identified harm to local infrastructure as set out above, consequently, taking account of the primary consideration, i.e. the Development Plan and where assessed against the policies of the NPPF as a whole, the adverse impacts of the proposal, the Strategic Planning Team therefore cannot support the proposal and recommends that planning permission is refused.

Jennifer Candler, Senior Policy Strategy Planner
Anik Bennett, Infrastructure Officer
Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

From: Paul Harrison <Paul.Harrison@babberghmidsuffolk.gov.uk>

Sent: 13 November 2020 10:43

To: Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: DC 20 05046 Needham Market

Heritage consultation response

Jasmine

I do not wish to offer comment on behalf of Heritage team on this proposal.

Paul

Paul Harrison

Heritage and Design Officer

T 01449 724677 | 07798 781360

E paul.harrison@babberghmidsuffolk.gov.uk

E heritage@babberghmidsuffolk.gov.uk

W www.babergh.gov.uk | www.midsuffolk.gov.uk

For our latest Coronavirus response please visit our website via the following link:

<https://www.midsuffolk.gov.uk/features/our-covid-19-response/>

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



From: Paul Harrison <Paul.Harrison@baberghmidsuffolk.gov.uk>
Sent: 21 January 2021 13:08
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>
Subject: DC 20 05046 Needham Market

Jasmine

Further to our conversation this morning, you have asked for clarification as to why in responding to your consultation request I offered no comment on behalf of Heritage team.

The proposal has potential to affect the setting of any nearby heritage assets. The only one likely to be affected, in view of its location and character is Kennels Farm, a listed farmhouse on the rising ground to the south of Barking Road which I have visited in connection with a previous application. Its setting is predominantly rural with the urban edge of the town to the north. The proposal would bring that edge closer, increasing the quantum of residential development and slightly widening its arc as viewed from the listed building. But as the development would not fundamentally change the character of land in the setting, I concluded that a formal assessment of significance and impact by myself was not necessary in this instance.

I trust this is helpful.

Regards

Paul

Paul Harrison
Heritage and Design Officer
T 01449 724677 | 07798 781360
E paul.harrison@baberghmidsuffolk.gov.uk
E heritage@baberghmidsuffolk.gov.uk
W www.babergh.gov.uk | www.midsuffolk.gov.uk

From: David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>
Sent: 12 November 2020 12:15
To: Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/20/05046 Land On The North West Side Of, Barking Road, Needham Market

Jasmine

I have no objection in principle to this application as any arboricultural impact would appear negligible, no trees are proposed for removal. However, some of the development in the south west corner of the site looks to be in close proximity to the important woodland W48 and this requires clarification. If you are minded to recommend approval we will require further information including a detailed arboricultural method statement and tree protection plan to help ensure the proposed safeguarding measures are effective, this can be dealt with under condition.

Please let me know if you require any further input.

Regards

David Pizzey FArborA
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



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

15/12/2020

For the attention of: Jasmine Whyard

Ref: DC/20/05046; Land on the north west side of, Barking Road, Needham Market

Thank you for consulting us on the application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

The following landscape and visual observations have been made following a desktop study and a site visit by a Chartered Landscape Architect and Member of the Landscape Institute. The site visit was undertaken on a bright and clear day in early December 2020, when deciduous trees had minimal leaf cover and visibility was good.

The existing site (16.2ha) is a large-scale sloping open arable fields with field boundaries marked by hedgerows in varying condition. The eastern boundary abuts existing residential development, the western boundary by agriculture fields and priority habitat deciduous woodland, the north by the football ground adjacent to 'the Drift' PRow and the south by Barking Road.

This site was also identified as potentially suitable land for residential development in the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA 2017) (Site SS1070). However, landscape was one of the identified constraints that required further investigation. Since then, a Landscape Sensitivity Assessment (LUC, 2020) was produced, which identifies the site as having moderate landscape sensitivity to residential development. It states "*The landscape makes a positive contribution to the rural setting and character of Needham Market and provides a rural backdrop to existing settlement...The development of the site is likely to be perceived as encroachment into the countryside. Other sensitive features including the sloping landform, undeveloped backdrop provided to existing settlement, open views and deciduous woodland habitat*".

The site is adjacent to a Special Landscape Area (SLA). Policy CL2 Special Landscape Areas of the Mid Suffolk Local Plan (1998) Saved Policies states that development proposals in Special Landscape Areas "*will only be permitted where they maintain or enhance the special landscape qualities of the area and ensure that the proposal is designed and sited so as to harmonise with the landscape setting.*" Although not located within the SLA, it's important that the setting of the SLA is also protected.

Policy CS 5 Mid Suffolk's Environment (Mid Suffolk Core Strategy 2008) states that; *“All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area. To protect, manage and enhance Mid Suffolk's biodiversity and geodiversity based on a network of:*

- *Designated Sites (international, national, regional and local)*
- *Biodiversity Action Plan Species and Habitats, geodiversity interests within the wider environment*
- *Wildlife Corridors and Ecological Networks*

and where appropriate increase opportunities for access and appreciation of biodiversity and geodiversity conservation for all sections of the community....”

In regards to Landscape: *“ 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.”*

The Suffolk Landscape Character Assessment defines the landscape character types (LCT) for the site and the surrounding landscape. The Rolling Valley Farmlands LCT defines the eastern part of the site, whilst the western edge of the site is defined by Ancient Plateau Claylands LCT. Key features of both LCT include; distinct areas of regular field patterns, flat or gently rolling arable landscape, small patches of straight-edged fields associated with the late enclosure of woods and greens and hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees. The assessment states that due to rolling landform, settlement expansion will have a significant visual impact and adversely affect the character of the landscape. While the outline proposal looks to mitigate its impact on the landscape setting and character by enhancing the existing field boundaries and the provision of additional green infrastructure/structural planting too, there is still a concern that the development is disconnected from the existing settlement, encroaching into the countryside, and impacts on the landscape setting and character will be adverse.

Review of submitted information

The submitted Landscape and Visual impact Appraisal (LVA) (Document ref: LFM/PPL/NEE/LA01) has been prepared following the principles set out in the third edition of the "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) including an assessment of both landscape and visual sensitivity, magnitude of change and impact.

The submitted LVA is accurate and appropriately describes the range of views that are available surrounding the site. However, we consider the assessment underestimates the likely effects of the proposed development on landscape character and visual amenity. For instance,, in terms of visual amenity, the LVA is supported by visual receptor photography following a summer site visit in 2018. We would have expected all visual representation with any submitted LVA to be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.

For a development of this scale and in such an open location, the site survey should have been supported by winter views to ensure a 'worst case scenario' is being appraised. The appraisal format is convoluted with representative viewpoints and the residual effects not clearly identified. Instead, 'development effects' both negative and positive are described and an overall summary of the residual effects on visual receptors is provided. Views such as those from the 'drift' PRow and Barking Road should be considered and appraised individually so visual impact is not misjudged and undervalued.

In regards to the landscape appraisal, the report refers to the quality of the landscape, stating that *“The site has also been excluded from the designation of SLA which surrounds the site to the West, East and South and the quality of the landscape is therefore considered ordinary.”* The use of the word ‘ordinary’ is unusual and given the rural setting this landscape provides to Needham Market, sloping topography and open views, we would consider this landscape to be of good quality. In regard to residual effects, we understand that there will be mitigation planting proposed as part of the development, along with enhancements to existing vegetation, however this does not detract from the impact that additional housing, infrastructure and lighting will have on this rural landscape edge, encroaching into the countryside and impacting on the setting of the SLA. These negative effects don’t seem to have been considered with the same weight as the proposed positive effects.

It’s also worth noting that the landscape is classed as Grade 2 agricultural land, which means its very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting. This land is given a higher status when considering development as NPPF paragraph 170 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by [...] recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.”

Policy CS 5 (Mid Suffolk Core Strategy 2008) also refers to geodiversity, and how it should be protected, managed and enhanced.; *“All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area. To protect, manage and enhance Mid Suffolk’s biodiversity and geodiversity”*. Therefore, consideration for its geodiversity quality, as well as its landscape and visual quality should be a key factor in determining the suitability for development on this site.

For these reasons above, we cannot be supportive of this outline planning application. In this response, we have highlighted a number of suggested amendments which would need to be reviewed and considered. The submitted Landscape and Visual Impact Appraisal includes some mitigation proposals, however the principal of development in this landscape will have an adverse impact on the geodiversity, as well as the rural setting and character of Needham Market and the SLA, all of which are contrary to Policy CS 5.

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

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant
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.



1st December 2020

Jasmine Whyard
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this outline 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/20/05046
Location: Land On The North West Side Of Barking Road Needham Market Suffolk
Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Dear Jasmine,

Thank you for consulting Place Services on the above outline application.

Holding objection due to insufficient ecological information on European Protected Species (Hazel Dormice & bats), Protected species (reptiles) and Priority species farmland birds (Skylark)

Summary

We have reviewed the Ecological Impact Assessment (Parker Planning Services Ltd, December 2018), provided by the applicant, relating to the likely impacts of development on designated Sites, protected and Priority species & Habitats.

We are not satisfied that sufficient ecological information is currently available for determination of this application.

This is because the Ecological Impact Assessment to support this application is out of date, following CIEEM¹ and Government Guidance² (Protected species and development: advice for local planning authorities).

¹ [Advice note on the Lifespan of Ecological Reports and Surveys \(CIEEM, April 2019\)](#)

² <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#standing-advice-for-protected-species>



Therefore, a professional ecologist will need to undertake a further site visit and may also need to update desk study information, to inform a revised Ecological Impact Assessment. The professional ecologist will then need to provide a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

We do not consider that the Dormouse or reptile surveys are up to date or fit for purpose. This is because the surveys were conducted in 2016 by Southern Ecological Solutions Ltd for the refused application (3506/16) and were only carried out on the southern part of the site. Therefore, it is recommended that these surveys are updated to support this application, unless reasonable justification can be provided why no further surveys are required. In particular, it is highlighted that Hazel Dormice are a notoriously difficult species to survey and a lack of evidence within 2016 does not necessarily mean that the species is likely absent from the site if the habitat is suitable and connectivity across the wider landscape is present.

Furthermore, it is considered likely that development could impact upon foraging and commuting bats. Therefore, we recommend that a Bat Activity Survey should be carried out to assess the likely impacts upon these European Protected Species. This is necessary to determine whether masterplans will impact upon key bat flightpaths and will help inform appropriate Wildlife Sensitive Lighting Strategies for the scheme. Any additional recommendations should follow guidance provided by BCT & ILP (2018)³.

All necessary further surveys must be undertaken by suitably qualified ecologists at the appropriate time of year using standard methodologies. This is required prior to determination because the Local Planning Authority must consider the guidance under paragraph 99 of the ODPM Circular 06/2005. This advises that the presence or otherwise of protected species, and the extent to which they might be affected by the proposed development, must be established before planning permission is granted. Therefore, if there is a reasonable likelihood of protected species being present and affected by the development, the surveys should be completed and any necessary measures to protect the species should be in place before the permission is granted.

We also note that the Ecological Impact Assessment has identified that development will result in the loss of between 1.4 and 4.2 estimated nesting territories of Skylark within the site based on average nesting densities on arable farmland. Therefore, it is recommended that a Farmland Bird Mitigation Strategy will be required to secure offsite compensation for the maximum number of nesting territories that could be present on the site. Therefore, the proposed offer to provide nesting opportunities for other BoCC Red listed species is not considered appropriate as it involves no measures for Skylark, a Priority Species.

The Farmland Bird Mitigation Strategy would require the delivery of two Skylark plots for every Skylark territory lost or displaced, following the methodology for the Agri-Environment Scheme option: '[AB4 Skylark Plots](#)'. The Skylark plots should be secured in nearby agricultural land for a period of 10 years.

³ [Bat Conservation Trust and Institution of Lighting Professionals \(2018\) Guidance Note 08/18: Bats and artificial lighting in the UK Bats and the Building Environment Series. BCT, London.](#)



This could include correspondence with [Whirledge & Nott](#) who may be able to secure delivery of the bespoke mitigation strategy under a stand alone agreement or alternatively, if appropriate nearby agricultural land within the applicant's control can be provided, details for the Skylarks plots can be included in the Farmland Bird Mitigation Strategy.

Therefore, further information is required to provide the LPA with certainty of impacts on protected and Priority species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

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

Please contact us with any queries.

Yours sincerely,

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

placeservicesecology@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.

17 December 2020

Jasmine Whyard
Planning Officer
Mid Suffolk District Council
Endeavour House, 8 Russell Rd,
Ipswich, IP1 2BX

Dear Ms Whyard,

DC/20/05046 Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access. Land on The North West Side Of Barking Road Needham Market Suffolk

I am writing on behalf of the Suffolk Preservation Society (SPS) to object to the above application for the erection of 279 dwellings on a greenfield site on the western edge of Needham Market. Development of the southern portion of this site for 152 dwellings was previously refused (application ref: 3506/16) on the basis of the singular vehicular access point onto Barking Road and the considerable distance of the site from school and community facilities. Whilst SPS defers to the SCC Highway authority on highway issues, it does not appear that these fundamental reasons for refusal have been adequately addressed in the current application.

Moreover, we have concerns regarding the landscape impact of these proposals on the increased site which will introduce a large number of new dwellings, lighting and vehicular movements into the countryside edge of the town. The topography of the land rises away from Barking Road which will result in the development being particularly prominent when approaching Needham Market from the west. Therefore, although a degree of landscape mitigation through enhanced hedgerows has been proposed, this will have limited effect on the visual impact particularly in the winter months. The Suffolk Landscape Character Assessment defines the landscape character types as Rolling Valley Farmlands and Ancient Plateau Claylands and states that due to rolling landform of both areas, *settlement expansion will have a significant visual impact and adversely affect the character of the landscape.*

The 2020 SHELAA raises landscape as one of the potential constraints of developing this site and we note that this site has not been brought forward in either the emerging joint local plan or Needham Market Neighbourhood Plan. Whilst the development would represent a significant contribution to the housing needs of the district, taking into account the landscape and access and sustainable location issues, we see no justification in approving this application and urge that it is refused.

We trust that you will find these comments helpful in the consideration of this application.

Yours sincerely,

Bethany Philbidge
BSc (Hons) MSc (Town Planning)
Planning Officer

Cc: Needham Market Town Council
Phil Butler, SPS Mid Suffolk District

From: Stowmarket Ramblers

Sent: 01 December 2020 17:42

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

Subject: RE: DC/20/05046 - Land On The North West Side of Barking Road, NeedhamMarket

 **EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Thank you for your message. I will not be commenting on this planning application.

Bob Boardman, Stowmarket Ramblers



Needham Market Society

19 Steggall Close NEEDHAM MARKET IP6 8EB

27 November 2020

Babergh & Mid Suffolk District Councils

Endeavour House

8 Russell Road

IPSWICH

IP1 2BX

Dear Sirs

[Planning Application DC/20/05046](#)

The Society has been considering the outline planning permission for housing on a block of land along the Barking Road.

The Society was established over 60 years ago when another enormous increase in dwellings threatened the town, and it still aims to ensure that any development of Needham Market should be consistent with the preservation of its present character in the interest of its present residents.

The proposed development would deeply affect the present residents. NHS England, according to the Parker Planning Services document, have stated that the "development is likely to have an impact on the services of the GP practice nearby which does not have capacity for additional growth". The primary school has no further capacity either. We all need reasonable access to a doctor, notoriously difficult even before the pandemic, and our children need educating.

The additional traffic from workers and school runs would clog up an already very busy B road running through the town as well as the residential streets. The Barking Road B1078 where the main access/egress for the site is proposed is another cause for concern. Speeding traffic has historically caused accidents along that stretch. As for public transport the train station is a long walk from the site, along unlit paths from the proposed pedestrian entrance/exit to The Drift, and the only bus service travels along the B1113, the High Street. There is no longer a bus service along Foxglove Avenue even though the stop signs remain.

The flood risk does not seem to have been adequately addressed. The Gipping Flood plain is nowhere near the site, the flood problem is to do with the lie of the land. To apply concrete and tarmac to that land will increase flood risk particularly at times of heavy rain which, even in this dry region, are on the increase.

The combined Mid Suffolk/Babergh Local Plan states that there were 497 dwellings planned for Needham Market, including 311 outstanding planning permissions granted as at 1 April 2018, 245 of which relate to the Chalk Pit development. The Joint Local Plan allocated a further 186 dwellings comprising LA030, 66 on land west of Stowmarket Road, LA031 40 on the Middle School site and LA032 80 on the former MSDC offices and car park site. These numbers were subsequently changed in 2018/9 to 64, 41 and 94 respectively bringing the total to 199. Add to this permissions granted for a further 24 dwellings on Luff Meadow, 4 at The Institute and 9 on the Stowmarket Road and it is quite clear that no more new homes are required by the Local Plan.

We consider the planned target of utmost importance. No more new homes are required by the Local Plan. A development of the size proposed for Barking Road is totally disproportionate to the scale of amenities available to Needham Market residents. The character of the town and the enjoyment of it by those currently living here will be seriously affected by such a development.

The Needham Market Society objects to the proposal.

Yours faithfully

Mrs A K Davies

Chairman

Patron Her Majesty The Queen

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

Tel 02476 840500

Kenilworth,

Fax 02476 840501

Bringing Horses and People Together

Warwickshire CV8 2XZ

The
British
Horse
Society

Jasmine Whyard
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX
Via email

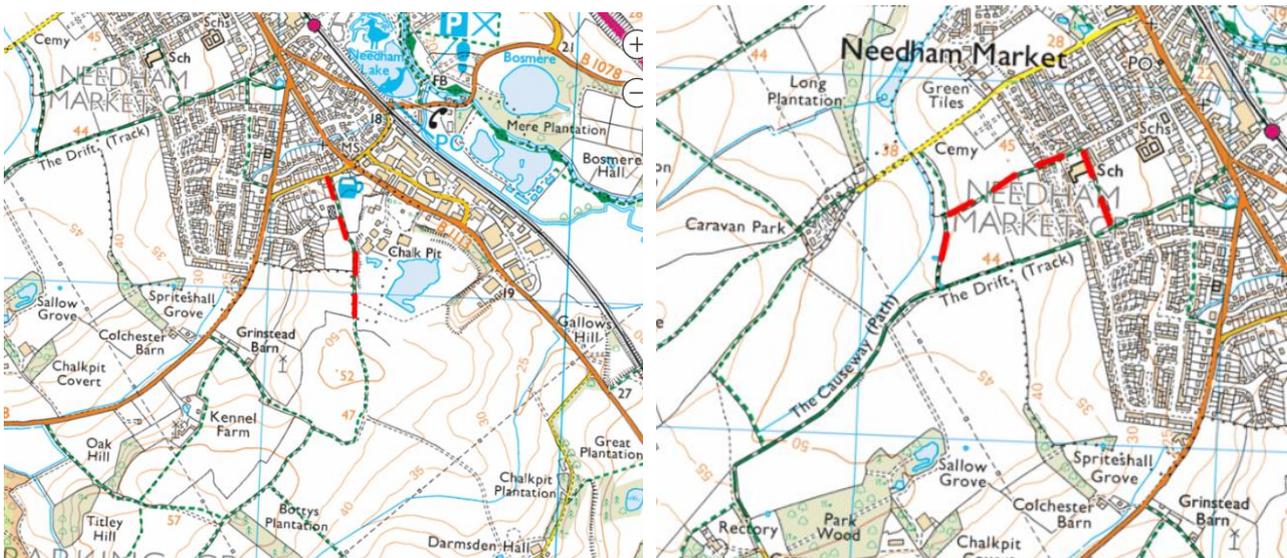
13th November 2020

Dear Ms Whyard,

RE: DC/20/05046 | Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access. | Land On The North West Side Of Barking Road Needham Market Suffolk

I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity which represents the 3 million horse riders in the UK. Nationally equestrians have just 22% of the rights of way network. In Suffolk, they have just 18% of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County. It is therefore important that these public rights are protected.

The British Horse Society has no objection to this application in principle but believes that historical evidence indicates that Needham Market Footpath 1 and Needham Market Footpath 11 are under recorded as a footpaths outside of the red line of the location plan, these routes can be reasonably alleged to subsist at a minimum of bridleway status. This public right should be asserted and an application to the County Council to have them recorded as such is likely to be forwarded in due course. These routes shown on the map below should be upgraded to at least Bridleway status if not Restricted Byway status as a condition of the permission being granted.



The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Limited who are authorised and regulated by the Financial Conduct Authority.

Registered Charity Nos. 210504 and SC038516. A company limited by guarantee. Registered in England & Wales No. 444742

Nationally, it is estimated that there are **3.5 million people** in the UK who ride or who drive a horse-drawn carriage. We estimate that 220,000-270,000 are employed in equine industries and the equine industry is estimated to be contributing at least **£7 billion each year** to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which **315 horses and 43 people were killed**. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, **3,863** horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (*NHS Hospital Episodes Statistics*).

The Society would argue that to fail to give proper consideration to their needs is a breach of the Equality Act 2010 and the Equal Opportunities Act 2010, as this failure can be seen to be both sexist and ageist, given that the majority of riders are female (over 90%) and many of them are over 45 (37%)¹. This group is one that is generally more inactive than their male counterparts (for example only 62% of women aged 45-54 meet recommended physical activity levels compared to 70% of men²) and so encouraging activity in this group meets important health objectives.

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/our-work/safety/dead-slow> – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.

Therefore the BHS asks that as part of the off-site network connections that Barking Footpaths 43, 44,45 and 46 are upgraded to at least Bridleway status to create safe off road routes which would link to the previously mentioned rights on Needham Market Footpath 11. The BHS would like to see the indicative footpath as shown with blue dashes on the plans to be instead a public bridleway allowing access for pedestrians, cyclists and equestrians, this would provide an essential link from Barking Public Bridleway 26 and Needham Market Public Bridleway 15 to Barking Footpath 46 which would create circular routes for users.

If Needham Market Public Bridleway 15 is going to be used for access then the Applicant MUST also take the following into account, and should note that regardless of whether planning permission is granted, separate permission for works on or over a Public Right of Way MUST be requested from Suffolk County Council’s Rights of Way Team prior to any work commencing, and that permission may be refused. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a Public Right of Way other than a Byway Open to All Traffic. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a Public Right of Way resulting from works must be made good by the applicant.

¹ British Horse Society Health Benefits of Horse Riding (research undertaken by University of Brighton and Plumpton College)

² British Heart Foundation Physical Activity Statistics

Yours sincerely

Charlotte Ditchburn (Miss.)
Access Field Officer, East Region

Comments for Planning Application DC/20/05046

Application Summary

Application Number: DC/20/05046

Address: Land On The North West Side Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (some matters reserved, access to be considered). Town and Country Planning Act 1990. - Erection of 279No dwellings (including 100 affordable dwellings) and access.

Case Officer: Jasmine Whyard

Customer Details

Name: Mrs Linda Hoggarth

Address: 26 Gipping Way, Bramford, Ipswich, Suffolk IP8 4HP

Comment Details

Commenter Type: Amenity Group

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: The Mid Suffolk Disability Forum would like to see a commitment to ensuring that all dwellings will meet Part M4 of the Building Regulations in an outline planning application.

Additionally, all dwellings should be visitable and meet Part M4(1), and 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2). It is our view that, in housing developments of this size, a proportion of the dwellings should be built to wheelchair standard Part M4(3).

The indicative mix of dwellings implies that a reasonable number of bungalows will be included in the development to assist people with mobility problems and to assist people who wish to downsize from larger dwellings.

Every effort should be made to ensure all footpaths are wide enough for wheelchair users, with a minimum width of 1500mm, and that any dropped kerbs are absolutely level with the road for ease of access.

Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used.

A development of this size will have a significant impact on the GP surgery and other facilities nearby.

The Railway Station is only partially accessible to wheelchair users and those with mobility

problems but your report does not take note of this.