

Consultee Comments for Planning Application DC/18/00861

Application Summary

Application Number: DC/18/00861

Address: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Gemma Pannell

Consultee Details

Name: Mrs Suzanne Eagle

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

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

The parish council objects to this application for the following reasons:-

1. Ely Road will be the only entrance to the development of 74 dwellings and it does get restricted by cars.

We are also very concerned regarding the siting of the traffic calming measures and would like to see these within the new development not on the current road. Actually we don't understand why these are required.

2. If the application for 300 dwellings at the bottom of Barham Church Lane goes ahead this, together with Ely Road for 74 dwellings, plus other small developments in Barham, traffic movements through Claydon village will increase dramatically. At present there are approximately 1600 properties in Claydon and Barham so all these developments represent a 30% increase. It is impossible to add infrastructure as the vast majority of traffic goes through filter roads on the estate down to the main road through the village and out to the A14 Junction 52 or off main village road to Great Blakenham.

3. We are very concerned that there will be three storey properties on this development which is out of character for the area, especially so close to properties on Ely Road.

4. There are environmental concerns but this will be covered more fully in other reports.

However, other than the items raised above, the parish council feels if development is required in Claydon and Barham this is the preferred option.

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Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Case Officer: Jo Hobbs

Consultee Details

Name: Mrs Charmaine Greenan

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

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

Claydon and Whitton Parish Council remain opposed to this development and strongly object for the reasons previously stated.

Ely Road and Thornhill Road (the only access to the development) are already extremely congested road. The attached photograph shows Thornhill Road at 11.39 on the 20.2.2019, demonstrating the lack of access due to parked vehicles. Buses are struggling to navigate their way through the estate as it is and with extra cars using this route, it will exacerbate the existing problem.

In conjunction with other developments proposed in Claydon and Barham, the cumulative effect on the villages will strip away the village identity and increase the amount of traffic dramatically.

This proposed development is an over-development of the plot of land. The recent plan has more properties packed together and it does not retain the village feel of the rest of the Claydon garden village. The new plan also mentions lots of 'private roads', and the Parish Council object to so many non-adopted roads.

There are concerns regarding water pressure, especially the cumulative effect if other planned developments are approved. There is currently insufficient water pressure for the houses already using the water and further development would impact water pressure adversely.

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Name: Mrs Charmaine Greenan

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

Email: claywhit@btinternet.com

On Behalf Of: Claydon And Whitton Parish Clerk

Comments

Claydon and Whitton Parish Council remain opposed to this proposal.

The minor changes made to the application to not have an impact on the problems with this proposal already highlighted by the Parish Council.

The latest proposal (in partnership with 1856/17) shows no improvement to the issues with the roads and excess traffic.

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Case Officer: Gemma Pannell

Consultee Details

Name: Mrs Joanne Culley

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

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On Behalf Of: Barham Parish Clerk

Comments

Barham Parish Council has mixed views about this development. While many in the Parish accept that housing on this site would be appropriate others have serious concerns over the impact of such a development on the local infrastructure and the environment.

On balance Barham Parish Council objects to this development unless our concerns listed below can be clearly mitigated.

1. Roads are very busy with the current population of the village; any additional vehicles will slow traffic flows during busy periods. What plans are in place to alleviate the village from the pressure of additional traffic?
2. The sewer running through Norwich Road has had its problems over recent years and will need upgrading to cope with the extra demand. Will the sewer be upgraded?
3. The Slade is a unique in the villages of Claydon and Barham and any development that encroaches will seriously impact this feature. How will the developers protect this area?
4. Although, often an eyesore, due to rubbish being dumped, the pit in the North East corner of the site is a haven for wildlife. With many residents asking if the burrowing that is currently taking place is a sign of badgers living locally. Will this area be protected and enhanced as part of the development?

PROPOSED RESIDENTIAL DEVELOPMENT

Land North West of Church Lane, Barham

(Planning Application Number 1856/17)

Updated Review of Transport and Access Issues

(addendum to our previous reports dated June 2018 and February 2019)

Prepared on behalf of:

Barham Parish Council
c/o Mr D Milward (Chair)
1 Lower Farm Cottages
Norwich Road
Barham
IP6 0NU

September 2020

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1 SCOPE OF THIS TRANSPORT NOTE

- 1.1 In summer 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with the following two planning applications:
- a proposal to construct up to 300 dwellings on land North West of Church Lane, Barham (application number 1856/17); and
 - a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861).
- 1.2 Our findings in respect of application number 1856/17 were presented in a report entitled “Review of Transport and Access Issues” dated June 2018.
- 1.3 In July 2018 we were instructed to extend the scope of our investigations to include application number DC/18/00861 (Ely Road). Our findings in respect of the Ely Road application and the cumulative impact of that scheme in conjunction with the larger scheme off Church Lane Barham were presented in a report entitled “Summary of Transport and Access Issues” dated July 2018.
- 1.4 In February 2019 we were instructed to update our previous advice to take in to account changes that had taken place since June 2018. Our updated advice was presented in a report entitled “Updated Review of Transport and Access Issues” dated February 2019.
- 1.5 In September 2020 we were instructed to update our previous advice in respect of Planning Application Ref 1856/17 (Land to the North West of Church Lane, Barham) to take in to account changes that have taken place since February 2019.
- 1.6 Our latest advice is presented in this report.

2 OUR PREVIOUS FINDINGS, CONCERNS AND RECOMMENDATIONS

- 2.1 The information presented in the applicants Transport Assessment clearly demonstrates that parts of the local highway network will be operating at, or over, capacity without the new development, the situation is significantly worse when the additional development generated traffic is taken into account.
- 2.2 The applicants do not propose any mitigation measures in the Transport Assessment.
- 2.3 In its consultation response dated 7 August 2017 Suffolk County Council which is the local highway authority (LHA) concluded that there would be a “detrimental impact on the road network” but did not take the matter any further at that time.
- 2.4 We subsequently recommended that the District Council and the LHA should facilitate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the numerous developments in the area were mitigated in a sustainable, safe and fair manner.
- 2.5 We were concerned that the Transport Assessment was based on July traffic count data because we would expect traffic flows in July to be below the annual average figure.
- 2.6 The applicants computer modelling identified capacity problems at the Station Road junction and at the Claydon Church Lane junctions.
- 2.7 We recommended that the development proposals should be subject to a Stage 1 Road Safety Audit (Stage 1 RSA) before planning permission is granted.
- 2.8 We recommended that this Stage 1 RSA should cover the following:
- the new and modified sections of highway infrastructure proposed as part of the development scheme
 - the sections of the existing highway network that are, or will be, operating close to, or above, capacity
 - the access routes between the application site and the existing schools
 - the access routes between the application site in the village centre

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- the route along Barham Church Lane between the application site and the northern outskirts of Ipswich
- 2.9 Following submission of our reports the LHA subsequently met with the developers of sites in Claydon, Barham, Bramford and Sproughton to discuss a cooperative approach to providing improvements to mitigate the highway impacts associated with the various proposed developments.
- 2.10 Barham Parish Council was not a party to these discussions.
- 2.11 We understand from the LHA's revised consultation response dated 11 January 2019 that the LHA concluded that only the Church Lane Barham scheme would have an impact on the Station Road/Norwich Road and Church Road/Norwich Road junctions. The LHA said *"The impact is during the peak hour in the growth year showing significant delays, these are not considered severe. To improve safety for the pedestrian and cyclist, highway improvement schemes are required at these junctions and will be included in the conditions below."*
- 2.12 There was no explanation as to how the LHA came to this conclusion. In our fabric 2019 report we requested that the LHA provide the information used to support the LHA's decision. We considered this particularly important given the number of proposed housing schemes being progressed through the planning system, and the fact that the emerging Local Plan had identified sites in the Barham in Claydon area that together total approximately 1900 dwellings.
- 2.13 In our February 2019 report we said:
- "Whilst the LHA's requirements that the Church Lane development should fund improved facilities for pedestrians and cyclists it is not clear how, or if, such improvements will address the traffic issues highlighted in the applicant's transport assessment."* (Para 4.20 That Consultancy Report, February 2019)
- "We therefore conclude that the fundamental issue identity in our previous two reports, this being cumulative traffic impact, has not been satisfactorily addressed."* (Para 4.22 That Consultancy Report, February 2019)

- 2.14 We also noted that the LHA's consultation response dated 11 January 2019 included a recommended planning condition requiring that "the highway element of the development shall not commence until the Road Safety Audit (stage 1 and 2) process has been carried out...".
- 2.15 In light of this recommendation from the LHA we reiterated our previous recommendation that:
- the Stage 1 RSA should encompass the wider highway network as documented above and not just the proposed site access and spine road design ; and
 - the RSA should be undertaken before, not after, planning permission is granted.

3 WHAT HAS HAPPENED SINCE FEBRUARY 2019?

- 3.1 An examination of the online planning system shows that our report dated February 2019 was uploaded on 28 February 2019 and again on 13 March 2019.
- 3.2 The next document on the portal is a report by TPA (the transport consultants acting for Pigeon Investment Management in respect of the Church Lane application) dated November 2019 and entitled “Barham and Claydon Highways Package Technical Note”.
- 3.3 We comment on this Technical Note later in this report.
- 3.4 By letter dated 4 December 2019 the LHA issued a revised consultation response. In this response the LHA concluded that *“The development would not have a severe impact on the highway network (NPPF paragraph 109) therefore we do not object to the proposal.”*
- 3.5 The LHA go on to set out 10 proposed conditions and then document the proposed S106 contributions (which relate to the travel plan, public transport, public rights of way and “village highway mitigation measures”).

4 ASSESSMENT OF THE “BARHAM AND CLAYDON HIGHWAYS PACKAGE TECHNICAL NOTE” (TPA, NOVEMBER 2019)

4.1 Paragraph 1.1 of the Technical Note states:

“The purpose of this technical note is to set out the collaborative approach between Suffolk County Council (SCC), Mid Suffolk District Council (MSDC), Pigeon Investment Management Ltd (Pigeon) and M Scott Properties Ltd (MSP) to assess the impacts of development proposals in Barham and Claydon and the delivery of a package of measures through financial contributions for the benefit of the local community.”

4.2 Paragraphs 1.15-1.18 of the Technical Note state:

“1.15 Discussions with SCC and MSDC have been supportive of a collaborative approach between the developers and their consultants which would deliver proportionate contributions towards the proposed package of junction, cycle and pedestrian safety improvement measures.

1.16 As a result Pigeon and MSP have reviewed the schemes and consider that there would be a benefit to Barham and Claydon if the pedestrian and cycle improvements and commitments were considered holistically, where proportionate contributions (based on the impact that each development has at each of the junctions) could be sought from the Norwich Road and Ely Road schemes to enable SCC to deliver a full package including potential pedestrian and cycle improvement works.

1.17 This note provides a summary of potential local infrastructure improvements, including:

- The current draft S.106 contributions for both sites;
- A proposed scheme at the Claydon Church Lane / Norwich Road junction;
- A proposed scheme at the Station Road / Norwich Road junction;
- A financial contribution to extend the current speed limit to the north of the village;

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- Financial contributions aimed at providing 'safer routes to schools' and key facilities; and
 - A financial contribution towards a package of village wide highway improvements.

1.18 Following extensive discussions with Barham & Claydon Parish Councils and Local Members it is recognised that the Financial Contributions proposed for a package of village wide highway improvements can be administered through SCC to be used in conjunction with Barham & Claydon Parish Councils to provide alternative measures which would equally benefit the local community."

THaT Consultancy Commentary

Section 106 Contributions

4.3 Public rights of way £115,500 (Barham Church Lane Site).

The LHA has identified where sections of the PROW network in the vicinity of the application site requires improvement. These works will improve the local PROW network primarily through surface improvement/repair. The geographical extent of the works is limited and is unlikely to lead to fundamental modal shift.

Pigeon Scheme (paragraphs 2.1-2.2)

4.4 The works described here are those needed to provide access to the proposed development. They are not "public benefits". They relate to the construction of the site spine road, providing bus stops on the spine road , providing pedestrian and cycle facilities, providing access to the church and providing a Travel Plan for the new development. In our opinion there is no significant public benefit arising from these measures: they are simply needed to provide access to the new development.

Station Road/Norwich Road junction (paragraph 2.4-2.6)

Estimated Cost £50,250

- 4.5 The proposed measures involve minor changes to the existing facilities for pedestrians and cyclists at the junction. In our opinion the proposed improvements/changes may bring about a minor improvement that will benefit pedestrians and cyclists should they choose to use these facilities. Our observations on site, however, suggest that it is unlikely that the cycle facilities will be well used.

Church Lane/Norwich Road junction (paragraphs 2.7-2.9)

Estimated Cost £24,000

- 4.6 The proposals involve minor footway widening, installing tactile paving, cutting back vegetation within highways land and, perhaps, removing the on street car parking bay and Church Lane close to the junction, or amending the Traffic Regulation Order to prevent parking during peak times.
- 4.7 Again, these are very minor changes to the existing situation which will only have a small beneficial effect and will not result in any significant change to the current situation.

Village Wide Cycle Infrastructure Improvement Works (paragraphs 2.10-2.12)

Estimated Cost £14,000

- 4.8 This relates to an unspecified “package of improvement works”.
- 4.9 At paragraph 2.11 the developer explains that:
- “The proposed financial contribution for infrastructure improvement works could be used to deliver the following benefits:*
- *to encourage walking and cycling;*
 - *to provide safer routes to school; and*
 - *to improve safety for pedestrians and cyclists.”*
- 4.10 It would appear from paragraph 1.18 of the report that the developers envisage that this money will be administered by the LHA in conjunction with the Parish Councils.

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- 4.11 Since we do not know what these works are it is difficult to understand how the LHA has estimated the figure of £14,000.

Extension of Speed Limit (Paragraphs 2.13-2.16)

Estimated Cost £10,000

- 4.12 In order to ensure reduced vehicle speeds on the southbound approach to the proposed new site access junction the developers proposed to move the existing 30-40 mph speed limit boundary 650 m north.
- 4.13 At paragraph 2.13 the developers acknowledge that this change is needed to accommodate the proposed new site access junction, but then go on to suggest that this “would have wider village benefits due to the reduction in vehicle speeds as they enter the village”.
- 4.14 It is necessary to move the 30 mph speed limit further north simply because the built-up area of the village has been extended further north. In our opinion there is no “wider village benefit” from making this change.

Apportionment of Costs

- 4.15 The estimated costs documented in TPA’s Technical Note and summarised above will be apportioned between the Barham Church Lane and Ely Road schemes.

Mitigation Measures (Paragraphs 3.1-3.11)

- 4.16 At paragraph 3.1 the developers say:
- “Through the finding [stet] of the transport work submitted in support of both the Norwich Road and Ely Road development proposals a mitigation strategy for the schemes has been addressed to minimise congestion caused by vehicle trips through a combination of localised highway infrastructure improvement works and encouraging alternative methods of transport to the private car.”*

4.17 Paragraph 3.2 goes on to say:

“The following four stage approach has been considered:

- *travel plan measures*
- *bus, cycle and pedestrian improvements*
- *Highway measures*
- *smarter choices”*

4.18 In our opinion the measures proposed by the applicant will do little, if anything, to promote sustainable travel choices in preference to the private car.

Conclusions (paragraphs 4.1-4.6)

4.19 At paragraph 4.5 of the technical note the developer states:

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

4.20 We fundamentally disagree with this statement. The “proposed package of benefits” as described in the developers Technical Note and commented on in this report will have minimal beneficial impact. The very small potential benefits arising from these measures have to be weighed against the very significant adverse impacts arising from the additional traffic that the development proposals will introduce onto the local highway network-a network that is already operating at or above capacity without additional development as is shown in the developers Transport Assessment.

5 CONCLUSIONS

- 5.1 We have reviewed the new information submitted since we prepared our previous report in February 2019. As part of these investigations we have assessed the developers proposed “infrastructure improvement schemes” against current guidance and best practice including undertaking a site visit.
- 5.2 Our overarching conclusion is that the concerns we have consistently raised since Summer 2018 have not been satisfactorily addressed.
- 5.3 In particular:
- the concerns and requests for information and clarification made previously have not been answered by either the County Council or the developers.
 - There seems to be a very close working relationship between the County Council and the developers. The developers’ reports and findings seem to have been accepted without any serious challenge by the County Council.
 - The developers’ latest proposals as presented in the Technical Note dated November 2019 will do little, if anything, to improve highway conditions in the village. They will certainly not mitigate the adverse impacts arising from the additional traffic that the proposed development will introduce onto the local highway network.
- 5.4 As congestion and delay increases so do the risks and dangers to all highway users, but particularly vulnerable groups such as pedestrians, cyclists and particularly schoolchildren. It is likely that drivers will seek out “rat runs” such as Barham Church Lane to avoid congestion and delay. Increased use of minor country lanes such as this will lead to an increased risk of accidents.
- 5.5 It should be noted that the “severity test” in Paragraph 109 of the NPPF relates to “residual cumulative impacts on the road network” and not to highway safety. The highway safety implications of a development proposal only have to be considered “unacceptable” by the decision-maker for the development to be refused on highway safety grounds. At present there is no clear guidance from Government as to what constitutes a “severe” or “unacceptable” impact. It is left to the “decision-maker” to make a judgement on a case-by-case basis.

- 5.6 It is clear from all the information we have reviewed in respect of the proposed development that the proposals will create a primarily car-based dormitory community that will introduce significant volumes of traffic on to a road network that is already operating at, or close to, capacity in the peak hours.

PROPOSED DEVELOPMENT OF UP TO 74 DWELLINGS

**Land to the East of Ely Road, Claydon
Planning Application Number DC/18/00861**

Summary Review of Transport and Access Issues

(addendum to our report relating to application number 1856/17 dated June 2018)

Prepared on behalf of:

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

July 2018

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1 INTRODUCTION

- 1.1 In June 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17).
- 1.2 Our findings and recommendations were presented in a report dated June 2018. Some of our findings and recommendations were site specific, others however related to the wider area; these are summarised below.

General Findings

- the emerging Local Plan and Strategic Housing and Economic Land Availability Assessment (SHELAA) has identified several potential residential development sites near Barham and Claydon. Together these total approximately 1900 dwellings.

[We understand that at present there are approximately 1600 properties in Claydon and Barham so the emerging residential development sites would more than double the size of the settlement.]

- The Transport Assessment submitted in respect of application number 1856/17 demonstrated that parts of the local highway network (particularly junctions in the village centre) will be operating at, or over, capacity without any additional development and that the additional traffic associated with the proposed development of up to 300 dwellings will significantly worsen the situation.
- The local highway authority commented that *“we have concerns regarding the number of trips created by the development [application number 1856/17] as this would create a considerable amount of additional traffic within a rural village location. The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area.”* [Our emphasis]
- The local highway authority also required a safe walking route to the existing primary school (Claydon primary school) to be assessed and identified in the travel plan to be produced in respect of the 300

dwellings scheme. It should be noted that the route referred to passes along Thornhill Road. We noted that a “serious” personal injury accident occurred on Thornhill Road in December 2015 and that Claydon Primary School is expected to expand by 25% in September 2019.

General Recommendation

- We recommended that the Parish Council should approach the District Council and the County Council to see if they will facilitate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the numerous developments in the area are mitigated in a sustainable, safe and fair manner.

Land to the East of Ely Road (Application No. DC/18/00861)

- 1.3 At its meeting on 4 July 2018 Mid Suffolk Development Control Committee A considered planning application number DC/18/00861. This application seeks permission to erect up to 74 dwellings on land to the east of Ely Road in Claydon. The application was submitted in outline with all matters except means of access reserved for subsequent approval. The local highway authority had no objection, subject to conditions, and the planning officer recommended that outline planning permission be granted subject to conditions. The Development Control Committee resolved to defer the application to the Referrals Committee.
- 1.4 Following the Development Control Committee’s decision Barham Parish Council instructed THaT Consultancy to review the planning application. Our observations are presented in this Statement.

2 OBSERVATIONS IN RESPECT OF APPLICATION NUMBER DC/18/00861

General Concerns

- 2.1 The application site lies within one of the areas identified in the emerging Local Plan as being potentially suitable for residential development. The 74 dwellings proposed therefore form a part of the approximately 1900 new dwellings identified in the Barham and Claydon area.
- 2.2 The traffic likely to be generated by this proposed development will be distributed on much the same local road network in much the same proportions as the 300 unit scheme to the north of Church Lane (application number 1856/17). We note that the applicant has estimated that approximately 10% of development generated traffic will travel via Thornhill Road (North) and the remaining 90% will use Thornhill Road (South). This means that approximately 90% of development generated traffic will travel through the village using the highway network that has been identified as operating at, or over, capacity without any additional development in the area.
- 2.3 Although this critical section of road network is evaluated in detail in the Transport Assessment submitted in respect of application number 1856/17 no such assessment has been undertaken in respect of application number DC/18/00861. The only junction modelling presented in the Transport Statement submitted in respect of application DC/18/00861 relates to the Thornhill Road/Ely Road priority junction. There is no assessment of the potential impact of development generated traffic beyond this junction.
- 2.4 This is perhaps not surprising given the relatively small number of additional vehicle movements involved. The local highway authority did not require the applicant to consider potential impacts beyond the Thornhill Road/Ely Road junction.
- 2.5 However, we know from the detailed computer modelling undertaken in the context of application number 1856/17 that parts of the local highway network are already operating at capacity. The relatively small amount of additional traffic on these critical sections of the local highway network arising from the proposed development of 74 dwellings will make an already poor situation slightly worse.
- 2.6 The likely effect of increasing traffic flows through the village, without any mitigation measures, will be to alter the character of the road network and give more importance to its “movement” function in preference to its “place” function.

- 2.7 When commenting on application number 1856/17 the local highway authority noted that:
- “The increase in trips and traffic would present a detrimental impact to the road network and landscape character of the area.”*
- 2.8 The computer modelling submitted in the context of application number 1856/17 shows how unstable traffic conditions can be when the highway network is operating at, or above, capacity. In these circumstances even small increases in traffic flow can have a disproportionately large impact.
- 2.9 This point is made, albeit in a different context, in Paragraph 6.1 of the Transport Statement submitted in respect of application number DC/18/00861, which states:
- “An RFC [ratio of flow to capacity] value greater than 1.0 means that a turning movement has a higher level of traffic flow than its theoretical capacity. As a result, flows breakdown and queues can be expected. An RFC below 0.85 is considered acceptable as there is still scope to accommodate future growth.”*
- 2.10 We suggest therefore that the District Council, in consultation with the local highway authority, has to decide whether or not it is prepared to permit new developments knowing that each development will have a small detrimental impact on the operation of the highway network in the village, but knowing that the cumulative impact of the various emerging housing developments is likely to be significant.
- 2.11 This is likely to be a particular cause for concern if the number of dwellings in the settlement doubles which seems possible given the emerging Local Plan and its supporting information.
- 2.12 It should be noted that the vehicle trip rates used in the Transport Statement in respect of application number DC/18/00861 are lower than those observed at Old Rectory Close and utilised in the Transport Assessment in respect of application number 1856/17. The trip rates used in respect of DC/18/00861 are only 76% of the observed figure in the AM peak and only 66% in the PM peak.
- 2.13 It is possible therefore that the Transport Statement submitted in respect of application DC/18/00861 has underestimated the likely number of vehicle movements that the proposed development will generate.

- 2.14 The survey at Old Rectory Close showed a daily trip rate of 5.394 vehicle movements per dwelling. If this daily trip rate is applied to the proposed development of 74 dwellings at Ely Road, then the proposed development can be expected to generate approximately 400 vehicle movements per weekday.

Site Specific Concerns

- 2.15 We note that the applicants are proposing a carriageway width restriction at the point where the proposed site access road meets Ely Road. This will be created by installing a 1 m wide buildout on each side of the carriageway. The buildout on the southern side of the carriageway will also act as a footway.
- 2.16 Based upon the information currently available to us it would appear that this arrangement is proposed because the applicants do not control sufficient land to provide a conventional highways layout at the point where the proposed new site access road meets the end of Ely Road.
- 2.17 The recommended minimum footway width is 2.0 m. This is what is proposed within the application site. A width of 1.0 m will enable an adult to walk on their own along this stretch of footway, but it is not wide enough to enable an adult to walk with a child by their side.
- 2.18 To address this concern the applicants intend providing an uncontrolled pedestrian crossing either side of the width restriction. The expectation, presumably, is that pedestrians walking along the south side of Ely Road/site access road will cross to the north side at the width restriction.
- 2.19 We think this is an unrealistic expectation, and that the reality is likely to be that pedestrians will step into the carriageway.
- 2.20 Given that the main pedestrian desire line is likely to be between the application site and Thornhill Road (south) i.e. the route to/from the schools and village centre, we suggest that the proposed site access arrangements are reviewed to ensure that the safety of vulnerable road users is not prejudiced.

2.21 Paragraph 4.5 of the Transport Statement states:

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

2.22 As well as implementing a 20 mph zone within the site we suggest that it would be beneficial in highway safety terms to introduce a 20 mph speed limit on Ely Road and Thornhill Road as well. This will serve to constrain vehicle speeds on an important route to/from the nearby schools. The 20 mph speed limit could, of course, be extended to include the wider residential area.

2.23 We note that the automatic traffic count surveys undertaken by the applicant and presented in the Transport Statement show average vehicle speeds on Thornhill Road to be 26 mph, and the 85th percentile speed to be 32 mph. The speed limit is 30 mph.

2.24 The maximum design speed for residential streets should normally be 20 mph. Clearly observed vehicle speeds on Thornhill Road are well above this figure. However, given the width of Thornhill Road, its relatively straight alignment and excellent forward visibility, the observed speeds are what would be expected.

2.25 Thornhill Road is an important route to/from the schools to the south and is used by pedestrians, cyclists and motorists.

2.26 Given the increased use of Thornhill Road that will result from the proposed new residential developments in the area, together with the increases that will result from the expansion at the primary school, we consider it appropriate to implement measures now to make the route safer and, more attractive, to pedestrians and cyclists.

3 SUMMARY

- 3.1 The proposed development of up to 74 dwellings on land to the east of Ely Road (application number DC/18/00861) is one of a series of housing schemes in the Barham and Claydon area that are at various stages in the planning process. When considered in isolation this scheme will have only a very small adverse impact on traffic conditions on the highway network in the settlement. However, when the cumulative impact of the various schemes is taken into consideration it is apparent that the impacts are likely to be severe and that the character of the area will change.
- 3.2 We therefore recommend that the various public bodies should formulate a coordinated approach to address the transport capacity issues in the locality to ensure that the transport impacts arising from the various developments are mitigated in a sustainable, safe and fair manner.
- 3.3 The proposed site access arrangements serving the Ely Road site will put pedestrians at risk. We therefore recommend that the access arrangements are revised to ensure that vulnerable road users are protected.
- 3.4 Vehicle speeds on Thornhill Road are relatively high (an observed 85th percentile design speed of 32 mph) compared to 20 mph which is the recommended maximum design speed for residential streets.
- 3.5 Thornhill Road is an important route to/from the nearby schools. Given the fact that the primary school schedule to expand by 25%, and the additional housing proposed in the area (including the site at Ely Road) it is likely that Thornhill Road will become significantly busier in the future. In order to make it a safe and attractive route for pedestrians and cyclists we recommend that consideration be given to implementing a 20 mph speed limit on Thornhill Road and the surrounding area.

PROPOSED RESIDENTIAL DEVELOPMENTS IN BARHAM AND CLAYDON

Land North West of Church Lane, Barham

(Planning Application Number 1856/17)

and

Land to the East of Ely Road, Claydon

(Planning Application Number DC/18/00861)

Updated Review of Transport and Access Issues

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

Prepared on behalf of:

Barham Parish Council

c/o Barham Parish Clerk

23 Old Rectory Close

Barham

IP6 0PY

February 2019

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1 SCOPE OF THIS TRANSPORT NOTE

- 1.1 In summer 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with the following two planning applications:
- a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17); and
 - a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861).
- 1.2 This Transport Note updates our previous advice to consider any new information, or changes, that have taken place since summer 2018.

2 BACKGROUND

- 2.1 In June 2018 THaT Consultancy were appointed by Barham Parish Council to review the transport and access issues associated with a proposal to construct up to 300 dwellings on land off Norwich Road in Barham (application number 1856/17). Our findings and recommendations were presented in a report dated June 2018. This report was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response on this planning application.
- 2.2 In July 2018 Barham Parish Council instructed THaT Consultancy to review the transport and access issues associated with a proposal to construct up to 74 dwellings on land to the east of Ely Road in Claydon (application number DC/18/00861). Our findings and recommendations were presented in a report dated July 2018 which was subsequently submitted to Babergh and Mid Suffolk District Councils as part of Barham Parish Council's consultation response in respect of this planning application.
- 2.3 Some of our findings and recommendations were site specific, others however related to the wider area and focused particularly on the cumulative traffic impact of the various development proposals that are being progressed through the planning system either by way of planning applications or via potential allocations in the emerging Local Plan.

3 WHAT HAS HAPPENED SINCE JULY 2018?

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

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

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

3.8 In this response the LHA explains that:

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

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

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

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

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

- 3.12 An examination of the local planning authority's online planning system shows that no further transport related information was provided by the applicant following submission of our previous report which was entered into the system on 13 August 2018.
- 3.13 By letter dated 28 November 2018 the LHA issued a revised consultation response in which they explained that:
- "Further analysis of the Barham and Claydon TAs showed the east of Ely Road application the predicted queue lengths on Station Road and Church Lane were 1 vehicle or below during the peak hour periods. Therefore, we do not consider any mitigation is required from this development."* [STET]
- 3.14 The LHA goes on to say:
- "Taking all the above into account, it is our opinion that this development would not have a severe impact (NPPF para 109) therefore we do not object to the proposal and advise the conditions and contributions previously given in our response dated 21st March 2018."*
- 3.15 It is not clear from the information publicly available how the LHA established the impact of the Ely Road scheme on the Station Road and Church Lane junctions because these were not modelled in the transport statement submitted by the applicants.
- 3.16 Revised illustrative proposals and supporting documentation were submitted by the applicant in February 2019. No detailed transport/highway information was submitted with the revised proposals other than a swept path analysis to show how a refuse vehicle could turn within the road network shown in the revised illustrative site layout.

4 THAT CONSULTANCY'S ASSESSMENT OF THE CURRENT SITUATION

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

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

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

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

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

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

Site Specific Concerns

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

Land to the East of Ely Road

- 4.24 We note that the applicants are proposing a carriageway width restriction at the point where the proposed site access road meets Ely Road. This will be created by installing a 1 m wide buildout on each side of the carriageway. The buildout on the southern side of the carriageway will also act as a footway.
- 4.25 Based upon the information currently available to us it would appear that this arrangement is proposed because the applicants do not control sufficient land to provide a conventional highways layout at the point where the proposed new site access road meets the end of Ely Road.
- 4.26 The recommended minimum footway width is 2.0 m. This is what is proposed within the application site. A width of 1.0 m will enable an adult to walk on their own along this stretch of footway, but it is not wide enough to enable an adult to walk with a child by their side.
- 4.27 To address this concern the applicants intend providing an uncontrolled pedestrian crossing either side of the width restriction. The expectation, presumably, is that pedestrians walking along the south side of Ely Road/site access road will cross to the north side at the width restriction.
- 4.28 We think this is an unrealistic expectation, and that the reality is likely to be that pedestrians will step into the carriageway.
- 4.29 Given that the main pedestrian desire line is likely to be between the application site and Thornhill Road (south) i.e. the route to/from the schools and village centre, we suggest that the proposed site access arrangements are reviewed to ensure that the safety of vulnerable road users is not prejudiced.
- 4.30 Paragraph 4.5 of the Transport Statement states:

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

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

Church Lane, Barham

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

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

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

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

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

Consultee Comments for Planning Application 1856/17

Application Summary

Application Number: 1856/17

Address: Land North West Of Church Lane Barham Suffolk

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

Case Officer: Jo Hobbs

Consultee Details

Name: Mrs Joanne Culley

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

Email: barhampc@outlook.com

On Behalf Of: Barham Parish Clerk

Comments

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

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

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

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

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

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

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

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

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

Lost Forever



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

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

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

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

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

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

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

Below extracts from the TPA report.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Try taking the developments I have mentioned above into consideration.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Report Highways England

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

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

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

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

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

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

Historic England Recommendation

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

Planning and Design Group report for Barham and Claydon Parish extracts

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

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

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

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

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

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

Summary

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

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

THaT consultants extract

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

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

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

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

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

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

The loss of grade 2 farming land.

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

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

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

THIS IS NOT SUSTAINABLE!

From: Melanie Thurston <barhampc@outlook.com>

Sent: 30 September 2020 09:10

To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>; Philip Isbell

<Philip.Isbell@baberghmidsuffolk.gov.uk>

Subject: Land North West of Church Lane, Barham (Planning Application Number 1856/17)

Dear Jo and Philip

Please find attached the updated review of the Transport and Access report which we have had had carried out on behalf of Barham Parish Council, in relation to the above proposed planning application.

Kind Regards

Melanie Thurston
Clerk to Barham PC

Sent from [Mail](#) for Windows 10

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: amanda.lyes@suffolk.nhs.uk
Telephone Number – 01473 770000

Your Ref: DC/18/00861/
Our Ref: IESCCG/SCDC/18/00861/AL

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

12 March 2018

Dear Sirs,

**Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.
Land To The East Of, Ely Road, Claydon, 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 and East Suffolk Clinical Commissioning Group (CCG) incorporating NHS England Midlands and East (East) (NHS England).

Background

2. The proposal comprises a development of up to 74 dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. Ipswich and East Suffolk CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

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

Healthcare Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. 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 and range of services within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment or extension, 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 reconfigure or extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

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

Ipswich and East Suffolk CCG and NHS England 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

Amanda Lyes

Chief Corporate Services Office

Ipswich and East Suffolk Clinical Commissioning Group



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

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

Your Ref: DC/18/00861

Our Ref: IESCCG/000219/CLA

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

19/02/2019

Dear Sirs,

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Location: Land To The East Of, Ely Road, Claydon, Suffolk

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

Background

2. The proposal comprises a development of up to 73 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

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

Healthcare Impact Assessment

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

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

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

Notes:

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

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

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

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

Yours faithfully

Chris Crisell

Estates Planning Support Officer

Ipswich and East Suffolk Clinical Commissioning Group

Date: 13 February 2019
Our ref: 272939
Your ref: DC/18/00861



Jo Hobbs
Mid Suffolk Council
planninggreen@baberghmidsuffolk.gov.uk

Customer Services
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Electra Way
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T 0300 060 3900

BY EMAIL ONLY

Dear Ms Hobbs

Planning consultation: Outline Planning Application (with means of access to be considered) - Erection of upto 73 dwellings, public open space and supporting site infrastructure including access.
Location: Land To The East Of, Ely Road, Claydon, Suffolk.

Thank you for your consultation on the above dated 06 February 2019 which was received by Natural England on 06 February 2019

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

Habitats Regulations Assessment - Recreational Impacts on European Sites

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'). It is anticipated that new housing development in this area is 'likely to have a significant effect', when considered either alone or in combination, upon the interest features of European Sites due to the risk of increased recreational pressure caused by that development.

As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission until such time as the implementation of this measure has been secured.

Notwithstanding this, Natural England's advice is that this proposed development, and the application of these measures to avoid or reduce the likely harmful effects from it, may need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment in view of the [European Site's conservation objectives](#) and in accordance with the Conservation of Habitats & Species Regulations 2017.

This is because Natural England notes that the recent [People Over Wind Ruling](#) by the Court of Justice of the European Union concluded that, when interpreting article 6(3) of the Habitats

Directive, it is not appropriate when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site. The ruling also concluded that such measures can, however, be considered during an appropriate assessment to determine whether a plan or project will have an adverse effect on the integrity of the European site. Your Authority should have regard to this and may wish to seek its own legal advice to fully understand the implications of this ruling in this context.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make.

Sites of Special Scientific Interest Impact Risk Zones

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

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

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

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

Yours sincerely

Alice Watson
Consultations Team

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.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

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

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

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

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

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where

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

appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Biodiversity duty

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

Date: 16 March 2018
Our ref: 240481
Your ref: DC/18/00861



Gemma Pannell
Mid Suffolk District Council
planninggreen@babberghmidsuffolk.gov.uk

Hornbeam House
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Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Gemma Pannell

Planning consultation: Outline Planning Application (with means of access to be considered) -
Erection of upto 74 dwellings, public open space and supporting site infrastructure including access.
Location: Land To The East Of, Ely Road, Claydon, Suffolk

Thank you for your consultation on the above dated 01 March 2018 which was received by Natural England on 01 March 2018

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

The Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2017

Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites - Further information required:
Habitats Regulations Assessment - Recreational Impacts on European Sites

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). It is anticipated that new housing development in this area is 'likely to have a significant effect' upon the interest features of the aforementioned designated site(s), when considered in combination, through increased recreational pressure. As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development to enable you to reach a conclusion of "no likely significant effect" whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMs is adequately funded. We therefore advise that you should not grant permission until such time as this mitigation measure has been secured.

Providing appropriate mitigation is secured to avoid impacts upon the European site(s) occurring there should be no additional impacts upon the SSSI interest features of Orwell Estuary and Little Blakenham Pit SSSIs.

Protected species

We have not assessed this application and associated documents for impacts on protected species. Natural England has published [Standing Advice](#) on protected species. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

Sites of Special Scientific Interest Impact Risk Zones

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

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

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

Yours sincerely
Hannah Bottomley
Consultations Team

Gemma Pannell
Planning Department
Mid Suffolk District Council
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info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

20/03/2018

Dear Gemma,

RE: DC/18/00861 Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access. Land to the East of Ely Road, Claydon

Thank you for sending us details of this application. We have read the ecological survey report (Geosphere Environmental, Jan 2018) and have the following comments on this proposal:

UK Priority Habitats

The site is crossed by a hedgerow, hedgerows are a UK Priority habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). Whilst the ecological survey report recommends that this hedgerow is retained, the Indicative Layout Plan (3484.05G) appears to show part of the hedgerow lost and the remaining part used to form the boundary between properties. Whilst we acknowledge that this is an Outline planning application, as proposed the level of development appears likely to result in the loss of this hedgerow. Loss of Priority habitats is contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk District Council's adopted Core Strategy policy CS5.

The site is also bounded on the eastern side by The Slade, this area includes deciduous woodland which is also a UK Priority habitat. Whilst this habitat is outside of the application site, it does form its eastern boundary. It is therefore important that this area is protected and suitably buffered from any development.

Protected and UK Priority Species

Bats

As identified in the ecological survey report, the site contains habitat suitable for roosting, commuting and foraging bats. The report goes on to state that if these habitats are retained then no further ecological survey or assessment is required, however from the drawings provided it appears that there will be some loss of these habitats (particularly hedgerow) and also the woodland on the eastern side of the site will not be buffered from the proposed development. We therefore consider that there is currently insufficient information available to be able to determine the likely impacts of the proposed development on bats.

Also, from the information available it is unclear what level of lighting will be required on the site. Insensitively designed lighting can have significant adverse impacts on biodiversity. It must therefore be ensured that any development in this location includes a lighting strategy which protects wildlife, particularly by ensuring that there is no lighting of habitat features such as woodland and hedgerows.

Great Crested Newts and Reptiles

The ecological survey report identifies that the site provides some suitable habitat for both great crested newts and reptiles, particularly along the hedgerows and in the areas of poor semi-improved grassland in the field margins. From the drawings provided it appears that a number of these areas will either be lost or fragmented by the proposal. We therefore consider that there is currently insufficient information available to be able to determine the likely impacts of the proposed development on great crested newts and reptiles.

Badgers

The ecological survey recorded evidence of badgers on site but did not find any evidence of sett building. However, suitable habitat for sett building is present immediately to the north-east of the site within the pit area. Mitigation measures for this species will therefore be required should it be determined that some development in this location is acceptable.

Greenspace

Whilst we acknowledge that this application is for Outline planning consent, from the Indicative Layout Plan (3484.05G) provided it appears that the potential development layout only includes a small amount of greenspace in the centre of the site. In order to mitigate for some of the impacts identified above it appears that a greater area of greenspace is required, particularly bordering the existing hedgerows and woodland. Consideration should therefore be given to reducing the number of dwellings proposed on the site to enable a greater proportion of greenspace to be delivered.

Habitats Regulations Assessment

The application site is within 13km of the Stour and Orwell Estuaries Special Protection Area (SPA). Work along the Suffolk coast has identified that new developments within this distance of such designated sites have the potential result in adverse impacts on these sites. This application must therefore be subject to a Habitats Regulations Assessment (HRA) to assess the likely impacts that will result from it. In particular, consideration must be given to the level of contribution required under the emerging Recreational Disturbance Avoidance Mitigation Strategy (RAMS).

Ecological Enhancements

Notwithstanding the above, the proposed development offers the opportunity to secure a range of ecological enhancement measures within its design. In addition to the measures identified in the ecological survey report (section 6.3), new buildings can also include integrated nesting opportunities for swifts. We recommend that, should it be determined that some development in this location is acceptable, an ecological enhancement plan is secured for the site detailing all of the ecological mitigation measures which will be implemented.

Conclusion

As set out above, we consider that as currently presented this application fails to demonstrate that the proposed development will not result in an adverse impact on UK Priority habitats and protected and/or UK Priority species. We therefore **object** to this application.

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

Yours sincerely

Jill Crighton
Conservation Planner

Consulting the Environment Agency

On Planning Consultations

October 2015

This form is designed to be completed by a Local Planning Authority and sent to the Environment Agency with a planning application or pre-application enquiry. The form should be used to explain why we are being consulted.

We will only respond to consultations that fall into one or more of the categories on this form.

Pre-application and planning application consultations

Category	Description	Reason for consulting EA
Cemeteries	Development relating to using land as a cemetery, including extensions.	<input type="checkbox"/>
Coastal erosion	Development (excluding minor development) located within Coastal Change Management Areas, as defined by the LPA.	<input type="checkbox"/>
Environmental Impact Assessment (EIA)	Development requiring an EIA, including scoping opinions and the environmental statement.	<input type="checkbox"/>
Flood risk	Development, other than minor development or as defined in our FRSA , which is carried out on land: <ul style="list-style-type: none"> • within Flood Zone 2 or 3, or • in an area within Flood Zone 1 which has critical drainage problems as notified by the Environment Agency. 	<input type="checkbox"/>
Groundwater protection	Potentially contaminating development ^{1 2} located in Source Protection Zones.	<input type="checkbox"/>
Hazardous waste/Control of Major Accident Hazard Regulations (COMAH) Sites	Development: <ul style="list-style-type: none"> • of new establishments, or • modifications to existing establishments which could have significant repercussions on major accident hazards, or • within 250 metres, where the siting or development would increase the risk or consequences of a major accident. 	<input type="checkbox"/>
Intensive farming	Development of intensive animal farming (such as pig or poultry) that may require an Environmental Permit ³ .	<input type="checkbox"/>
Pollution from land contamination	Development on land where a previous use ¹ of the site may have caused contamination.	<input type="checkbox"/>
Mineral Extraction	Development involving or including mineral and mining operations and restoration schemes relating to such development.	<input type="checkbox"/>
Oil and fuels	Development for the purpose of refining or storing non-domestic oils and their by-products.	<input type="checkbox"/>

Refuse or waste	Development that includes: <ul style="list-style-type: none"> the storage or spreading of sludge or slurry, or the storage, transfer, process, treatment and / or use of refuse or waste. 	<input type="checkbox"/>
Non-mains drainage	Major development proposing to use non-mains foul drainage.	<input type="checkbox"/>
Works affecting a watercourse	Development involving carrying out works or operations in the bed of or within 20 metres (or other distance as advised by your local Environment Agency Area Sustainable Places team) of the top of the bank of a Main River.	<input type="checkbox"/>
Discharge / variations of Conditions	Only consultations where the Environment Agency has requested the condition be attached to the planning permission.	<input type="checkbox"/>
Planning appeals –	Only appeals related to an Environment Agency objection or recommended condition.	<input type="checkbox"/>

Endnotes -

¹ - As defined on gov.uk, [Land contamination DoE industry Profiles](#)

² - This type of development also includes the storage of potentially contaminating substances as defined in DoE industry profiles

³ - An environmental permit is required for the development of or expanding of, an existing facility with more than 750 sows or 2,000 production pigs over 30kg or 40,000 poultry



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00026911
Local Planning Authority:	Babergh District
Site:	Ely Road, Barham
Proposal:	Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.
Planning Application:	DC/18/00861

Prepared by: Pre-Development Team

Date: 20 March 2018

If you would like to discuss any of the points in this document please contact me on 0345 606 6087 or email planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

- 3.1 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 – Surface Water Disposal

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).

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

Section 5 – Trade Effluent

- 5.1 Not applicable

Section 6 – Suggested Planning Conditions

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

Surface Water Disposal (Section 4)

CONDITION

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

REASON

To prevent environmental and amenity problems arising from flooding.

FOR THE ATTENTION OF THE APPLICANT:

Next steps

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

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

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

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

Foul water:

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

Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
 - Development hectare size
 - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website - <http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation>. For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
 - Connecting manhole discharge location
-

- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)

Your Ref: DC/18/00861
Our Ref: 570\CON\0843\18
Date: 21st March 2018



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

Email: planningadmin@babberghmidsuffolk.gov.uk

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

For the Attention of: Gemma Pannell

Dear Gemma

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN DC/18/00861

PROPOSAL: Outline Planning Application (with means of access to be considered) -
Erection of up to 74 dwellings, public open space and supporting site
infrastructure including access.

LOCATION: Land east of, Ely Road, Claydon, Ipswich, IP6 0BT

ROAD CLASS:

Notice is hereby given that the County Council as the local highway authority does not object to the proposal subject to the imposition of the conditions shown below on any permission to be granted and the completion of a S106 planning obligation to its satisfaction:

Conditions

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

1 ER 1

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

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

2 ER 2

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

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

3 HGV – CONSTRUCTION CONDITIONS

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

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- i) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- k) Details of deliveries times to the site during construction phase

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

4 P 2

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

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

5 B2

Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

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

6 TRAVEL PLAN

Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP) as identified in the Transport Statement (dated February 2018). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised travel planning and a multi-modal travel voucher.

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

NOTE - SCC can design and produce a travel pack on behalf of the applicant provided that a suitable Section 106 contribution can be agreed.

7 PROW

Condition: The definitive line of the public footpath must be physically marked out on site at the start of the development, and remain open, unobstructed and undisturbed for as much of the construction phase as possible. If crossed by construction traffic, then that crossing point must be maintained in a good state of repair and be safe and fit for use at all times.

Reason: In the interests of the amenity of the public.

8 NOTE 01

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

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. For further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

9 NOTE 07

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

10 NOTE 12

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

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

SECTION 106 REQUIREMENTS

Public Transport

There is a desire to upgrade the existing bus stops on Thornhill Road which will benefit residents and visitors to the site. Real time passenger information display screen is requested at a cost of £13,000 for installation.

Travel Plan

On reviewing the Transport Statement (dated February 2018) the proposed Travel Pack that was mentioned in paragraph 4.14 would be suitable to provide some highway mitigation for a residential development of 74 dwellings in accordance with paragraphs 32, 34, 35 and 36 of the NPPF. To secure the Travel Pack the condition 6, as shown above (with justification) will be required.

Public Rights Of Way

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

The anticipated increased use of the PROW network as a result of the development will require the offsite improvement works by resurfacing and widening of Barham Bridleway 009, Claydon FP13 & FP14 (approx. 750m length) therefore total s106 funding requested from this development, will be a total of £58,125.00.

Yours sincerely,

Sam Harvey

Senior Development Management Engineer

Strategic Development

From:Sam Harvey
Sent:11 Apr 2018 12:29:06 +0100
To:Gemma Pannell;BMSDC Planning Mailbox
Subject:18/00861 Land East of Ely Road, Claydon

Hello Gemma

The access arrangements into the site shown on the drawing received 29/04/18 are acceptable.

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, Suffolk

IP1 2BX

Email sam.harvey@suffolk.gov.uk

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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Jo Hobbs

Dear Jo

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN:**

PROPOSAL: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

LOCATION: Land east of, Ely Road, Claydon, Ipswich, IP6 0BT

ROAD CLASS:

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

Following the decision from the Planning Committee to defer the application to the Referrals Committee to consider the cumulative impact on highways from the proposed developments in the area. Suffolk County Council (SCC) carried out an analysis of the application's Transport Assessments on the following sites:

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

The data indicates there are significant delays at a number of junctions in Claydon and Sproughton and all applicants were asked to enter into a cooperative approach to consider any mitigation measures.

Following analysis of TAs to determine cumulative impact and various meetings with the planners and the applicants, it was decided that the sites in Claydon and Barham do not give significant impacts on the junctions in Bramford/Sproughton, nor Bramford and Sproughton Sites have impact on Claydon/Barham junctions.

Further analysis of the Barham and Claydon TAs showed the east of Ely Road application the predicted queue lengths on Station Road and Church Lane were 1 vehicle or below during the peak hour periods.

Therefore, we do not consider any mitigation is required from this development.

Taking all the above into account, it is our opinion that this development would not have a severe impact (NPPF para 109) therefore we do not object to the proposal and advise the conditions and contributions previously given in our response dated 21st March 2018.



Public Rights Of Way Improvements

The proposed development will have an impact on the local public rights of way (PROW) network. They are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism. The above plan shows the footpaths and bridleway that require improvements and we are requesting s106 funding for widening and resurfacing costing £58,125.00.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Jo Hobbs

Dear Jo,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION REF: DC/18/00861

PROPOSAL: Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

LOCATION: Land To The East Of, Ely Road, Claydon, Suffolk

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

COMMENTS

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

- The proposal for 73 dwellings would create approximately 43 vehicle movements within the peak hour (1.3 vehicles every minute) therefore the additional vehicles from the development will not affect the capacity of the highway network in the area.
- There are bus stops within 200m of the site with good public transport services
- The catchment primary school is approximately 650m from the site. The mitigation measures for footway improvements between the site and the primary school to create a safer route for the vulnerable user.
- the proposed mitigation measures to be funded by this and Norwich Road, Claydon application will provide highway improvements for cyclists and pedestrians in Claydon Village.
-

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

CONDITIONS

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

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

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

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

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

ER 1 - Condition: Prior to commencement of any works, (save for site clearance and technical investigations) details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

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

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

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

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be in accordance with Suffolk Parking Guidance 2015 and carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

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

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

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

B 2 - Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

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

NOTES

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

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

S106 CONTRIBUTIONS

Public Transport

There is a desire to upgrade the existing bus stops on Thornhill Road which will benefit residents and visitors to the site. Real time passenger information display screen is requested at a cost of £13,000 for installation.

Travel Plan

On reviewing the Transport Statement (dated February 2018) the proposed Travel Pack that was mentioned in paragraph 4.14 would be suitable to provide some highway mitigation for a residential development of 74 dwellings in accordance with paragraphs 32, 34, 35 and 36 of the NPPF. To secure the Travel Pack the condition 6, as shown above (with justification) will be required.

Public Rights Of Way

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

The anticipated increased use of the PROW network as a result of the development will require the offsite improvement works by resurfacing and widening of Barham Bridleway 009, Claydon FP13 & FP14 (approx. 750m length) therefore total s106 funding requested from this development, will be a total of £58,125.00.

Village Highway Mitigation Measures

The package of measures include:

Station Road / Norwich Road Junction and footway improvements

Church Lane / Norwich Road Junction and footway improvements

Village Wide Cycle Infrastructure Improvement Works

Norwich Road extension of Speed Limit on Norwich Road

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

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Your ref: DC/18/00861
Our ref: Claydon – land to the east of Ely Road
00052360
Date: 12 March 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Gemma,

Claydon: land to the east of Ely Road – developer contributions

I refer to the proposal: outline planning application (with means of access to be considered) – erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

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

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

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

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

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

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

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

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

Community Infrastructure Levy

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

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

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

As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. The requirements being sought here would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

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

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

sustainable development, which is the golden thread running through the NPPF. There are numerous 'hooks' within the NPPF which support the County Council's position.

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

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

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

The current planning application in Barham & Claydon under reference 1856/17 being promoted by Pigeon Investment Management is for outline consent for up to 300 homes and includes a reserved site for a new pre-school and a new primary school. This position reflects the strategic requirement for a new primary school in the locality.

Schemes in the locality currently on our radar include:

- a) Reference DC/18/00233/OUT – application in Bramford for 225 dwellings.
- b) Reference 1856/17 – application on land off Norwich Road at Barham & Claydon for 300 dwellings.
- c) Reference 1832/17 – scheme for 315 dwellings in Claydon. Recently refused but may go to appeal.
- d) Reference DC/17/04720 – this scheme in Claydon for 74 dwellings.
- e) Great Blakenham – Blakenham Fields scheme – approved scheme of 426 dwellings currently being built out by Bellway Homes.
- f) Great Blakenham, land west of Stowmarket Road – approved scheme of 130 dwellings.
- g) Great Blakenham, Kingfisher Drive – approved scheme for 10 dwellings.
- h) Bramford, Paper Mill Lane – approved scheme of 176 dwellings.
- i) Bramford, land east of The Street – approved scheme of 130 dwellings.

- j) Bramford, Clarice House – pre-application enquiry under references 3520/16 & IP/16/00096/PREAPP for 122 dwellings.
- k) Refer to the SHELAA.
- l) The above gives a cumulative total of at least 1,908 dwellings in the locality. Based on our standard methodology of 25 primary-age pupils for every 100 dwellings that generates the need for a 420-place primary school.

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

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

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

SCC anticipates the following minimum pupil yields from a development of 74 dwellings, namely:

- a) Primary school age range, 5-11: 17 pupils. Proportionate contribution towards land and build costs of a new primary school.
- b) Secondary school age range, 11-16: 12 pupils. Cost per place is £18,355 (2017/18 costs).
- c) Secondary school age range, 16+: 3 pupils. Costs per place is £19,907 (2017/18 costs).

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

Based on existing forecasts SCC will have no surplus places available at the catchment secondary schools for which CIL funding of at least £279,981 (2017/18 costs) will be sought.

At the primary school level, the current thinking is the emerging need for a new primary school in the locality taking into consideration housing growth. This need will become clearer when overall housing numbers and likely locations are identified by the District. Ideally this would be identified in a plan-led approach but at present there is a large amount of developer-led growth.

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

- a) The current Claydon Primary School is forecast to be at capacity taking into account pupils arising from basic need and those arising from schemes with planning permission.
- b) Whichever strategy is the most appropriate a site of a minimum size of 2 hectares will need to be identified and secured – refer to application reference 1856/17. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
- c) Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 17 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school.
- $\text{£6.9m} / 420 \text{ places} = \text{£16,429 per pupil place.}$
- From 74 dwellings it is forecast that 17 primary age pupils will arise.
- Therefore $17 \text{ pupils} \times \text{£16,429 per place} = \text{£279,293 (2017/18 costs).}$

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £494,200 for a 2-hectare site and equates to £1,177 per pupil place. For the proposed development, this equates to a proportionate land contribution of $17 \text{ places} \times \text{£1,177 per place} = \text{£20,009.}$

Use of the developer contributions – to be used towards the site acquisition and build costs of a new primary school in the locality to serve the new pupils of the proposed development. The developer contributions will be secured for a period of up to 10 years and returned if not spent. A clause included in the planning obligation that will enable the full developer contributions to fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development. A clause included in the planning obligation that will enable the full or a relative proportion of developer contributions to fall away, or be returned in full, if in the interim the existing Claydon Primary School is expanded up to 630 places (three forms of entry).

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

This proposed development is in the Claydon & Barham ward, where there is an existing surplus of 99 places.

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

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

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

5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £15,984, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, SCC would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the local planning authority's housing team to identify local housing needs.
8. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

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

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

The changes set out in the MWS took effect from 06 April 2015. A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

9. **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
10. **Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

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

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

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

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

Yours sincerely,

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

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

Your ref: DC/18/00861
 Our ref: Claydon – land to the east of Ely Road
 52360
 Date: 06 August 2020
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

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

Dear Jo,

Claydon: land to the east of Ely Road – developer contributions

I refer to the proposal: outline planning application (with means of access to be considered) – erection of up to 73 dwellings, public open space and supporting site infrastructure including access.

Reason(s) for update: previous advice, which was time-limited to six months, has now expired and the Department for Education have recently published new pupil scorecard costs.

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

Updated summary of infrastructure requirements:

CIL	Education	
	- Secondary school expansion	£285,300
	- Sixth form expansion	£71,325
CIL	Libraries improvements & resources	£15,768
CIL	Waste disposal improvements	£8,030
S106	Education	
	- Primary school new build	£348,636
	- Primary school land cost	£20,009
S106	Highway improvements	£15,542
S106	Public rights of way	£58,125

1. Education.

The most recent scorecard is 2019 and the national average school new build cost per pupil for primary schools is £20,508 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national new build cost (£20,508/1.00) produces a total of £20,508 per pupil for new build of primary schools.

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 (£23,775/1.00) 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”*.

- Primary school new build cost is 17 pupils x £20,508 = £348,636 (S106)
- Primary school land cost is 17 pupils x £1,177 = £20,009 (S106)
- Secondary is 12 pupils x £23,775 = £285,300 (CIL)
- Sixth form is 3 pupils x £23,775 = £71,325 (CIL)

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

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

Yours sincerely,

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

From:RM Floods Planning

Sent:Mon, 5 Mar 2018 10:00:07 +0000

To:BMSDC Planning Area Team Green

Cc:Gemma Pannell

Subject:2018-03-05 JS Reply Land To The East Of, Ely Road, Claydon, Suffolk Ref DC/18/00861

Dear Gemma Pannell,

Subject: Land To The East Of, Ely Road, Claydon, Suffolk Ref DC/18/00861

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/00861.

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

- Trial Pit Soakage Tests trial pits 1 to 4, Trial Pit Log & location Plan
- Indicative Layout for 74 Dwellings Ref 3484.05G
- Flood Risk Assessment & Appendices Ref CCE/U261/FRA-03
- Site Location Plan

The applicant has demonstrate that they have two methods for the disposal of surface water a) infiltration b) discharge to a public surface water sewer. The proposed discharge to ground is an option, but the applicant would need to demonstrate that they can accommodate two stages of treatment rather than a direct discharge to the chalk/source protection zone (outer zone 2) before this option is utilised.

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters applications a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;

- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
2. The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

3. Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

4. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

5. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:
 - a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 - i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton

Flood & Water Engineer, Flood & Water Management

Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Rd, Ipswich, Suffolk IP1 2BX

Telephone: 01473 260411

Email: jason.skilton@suffolk.gov.uk

Website: www.suffolk.gov.uk

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

From: planninggreen@baberghmidsuffolk.gov.uk [mailto:planninggreen@baberghmidsuffolk.gov.uk]

Sent: 01 March 2018 09:46

To: RM Floods Planning <floods.planning@suffolk.gov.uk>

Subject: MSDC Planning Consultation Request - DC/18/00861

Please find attached planning consultation request letter relating to planning application - DC/18/00861
- Land To The East Of, Ely Road, Claydon, Suffolk

Kind Regards

Planning Support Team

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From: Graham Gunby <graham.gunby@suffolk.gov.uk>
Sent: 07 February 2019 11:05
To: Jo Hobbs <Jo.Hobbs@baberghmidsuffolk.gov.uk>
Cc: Cameron Clow <Cameron.Clow@suffolk.gov.uk>
Subject: RE: Planning applications in Barham and Claydon

Hi Jo

I have looked at these applications within the context of both the Suffolk Minerals Core Strategy (MCS) Adopted 2008 and the Submission Draft Minerals & Waste Local Plan 2018 (SMWLP), which is now a material consideration. All of the sites are shown to be within Minerals Consultation Areas under the higher resolution SMWLP Minerals and Waste Safeguarding and Proposed Sites map. The corner of 1856/17 also clips the SMWLP safeguarding area for the Barham Quarry.

The closeness of these sites to existing housing precludes the quarrying of the underlying sand and gravel to a large extent although as sustainable alternative developers should use where possible the underlying sand and gravel in the construction of the sites. In addition 1856/17 should include any mitigation required to protect residents from the existing quarry and also not prejudice the development of the proposed extensions to the quarry (consideration in this instance should include potential noise, dust and visual impacts although may not be very significant. Further information can be found on the SCC website by following the link provided below. Look under previous consultations to find the Submission Draft SMWLP.

<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/>

Regards

Graham Gunby

Development Manager
Growth, Highways & Infrastructure Directorate
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
Suffolk IP1 2BX

Tel: 01473 26**4807**

E-mail: graham.gunby@suffolk.gov.uk

Website: www.suffolk.gov.uk

For more information about our minerals and waste planning service go to:
<http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/>

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

Our Ref: 2018_00861
Date: 8th March 2018

For the Attention of Gemma Pannell

Dear Mr Isbell

Planning Application DC/18/00861/OUT – Barham, Claydon, Land east of Ely Road,:
Archaeology

This site has high archaeological potential. It is situated in a topographically favourable location for archaeological activity overlooking the River, and in an area of light, sandy soils which tended to attract early occupation. To the north, in a similar topographic location and soils, Prehistoric, Roman and Anglo-Saxon settlement has been identified and recently confirmed during archaeological investigations (BRH 016).

Although nothing has to date been recorded from this site itself it has never been the subject of either amateur or systematic archaeological investigation and there is high potential for previously unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.

Given the high potential, lack of previous investigation and size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should below-ground heritage assets of significance be identified, will be based upon the results of the evaluation.

In order to establish the archaeological potential of the site, both geophysical and metal detecting surveys will be required in the first instance. The survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:

<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Faye Minter

Senior Archaeological Officer
Conservation Team

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

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

Enquiries to: James Rolfe
Direct Line: 01284 741225
Email: James.Rolfe@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_00861
Date: 12th February 2018

For the Attention of Jo Hobbs

Dear Mr Isbell

**Planning Application DC/18/00861/OUT – Barham, Claydon, Land east of Ely Road,:
Archaeology**

This site has high archaeological potential. It is situated in a topographically favourable location for archaeological activity overlooking the River, and in an area of light, sandy soils which tended to attract early occupation. To the north, in a similar topographic location and soils, Prehistoric, Roman and Anglo-Saxon settlement has been identified and recently confirmed during archaeological investigations (BRH 016). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

As recommended in our earlier advice metal detecting and geophysical surveys have taken place. Based upon the results of these surveys, 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 Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2018).

INFORMATIVE:

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

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

James Rolfe

Senior Archaeological Officer
Conservation Team



Phil Kemp
Design Out Crime Officer
Community Safety Unit
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street, Bury St Edmunds, Suffolk, IP33 2AP
Tele: 01284 774141 Fax: 01284 774130
www.suffolk.police.uk

PLANNING APPLICATION: DC/18/00861 Outline Planning Application
PROPOSAL: Outline Planning Application for up to 74 residential dwellings
LOCATION: Land east of Ely Road, Claydon, Suffolk
APPLICANT: Mr Richard Clews, Strutt & Parker for Mr Rob Scott, M. Scott Properties Ltd,
PLANNING OFFICER: Mr Alex Scott

Dear Mr Alex Scott

Thank you for allowing me to comment on the above Outline Planning Application for up to 74 dwellings at land east of Ely Road, Claydon.

I take on board that this is an initial outline planning application and that further details will be forwarded by the developers at the Reserved Matters stage, along with any possible amendments. As a result I feel that at present I do not have the full level of detail I require to make in depth specific individual comments in relation to 'designing out crime' for this outline application.

With this in mind, I strongly recommend that the applicant applies for ADQ and Secure by Design accreditation for Homes 2016. **Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75% and achieve ADQ.**

1.0 SITE SPECIFIC RECOMMENDATIONS

- 1.1 I have serious concerns regarding parking for the whole development, I realise that further details have yet to be supplied. From the plans offered so far, I would like to know how many garages will be incorporated and how many car ports. I note too that there will be at least two areas that will incorporate rear car parking by the north and to the south of new Ely Road access area as it comes in from the already established area of this road (pictured right). The police strongly discourage the sighting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, anti-social behaviour and graffiti. As these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties.
- 1.2 I hope the developers will reconsider and look at alternative areas for parking, where the vehicles will be observed from active windows within their respective properties and from neighbouring properties too. I would prefer it if as many lockable garages can be incorporated.



1.3 The police discourage the use of car ports, as they too do not provide security for parked vehicles. If car ports are to be implemented then I strongly recommend they are not designed to overhead undercroft standards as such designs not only hamper any form of surveillance they are more susceptible to Arson. These areas should allow for surveillance from active windows situated either at the front or to the side of the property, as well as from neighbouring properties and not set back, as is the case here. I also strongly recommend that photocell dusk to dawn lighting that meets BS5489:2013 lighting standards are placed on the side of buildings looking onto such areas and to provide some form of protection they are securely gated.

1.4 Further details recommending on parking can be found within "Secure By Design (SBD) New Homes 2016" section 1, at para 16 entitled "Car Parking", para 16.1- 16.7, pages 22-23. Along with section 3 at para 52, also entitled "Car Parking", para 52.1-52.2, pages 62-63.

1.5 I have concerns the number of foot paths envisaged will make the area too permeable for offenders to come and go and make the rear of properties on the south western and southern sides more vulnerable to crime (pictured right). I would prefer it if there was only one foot path,



linked to the new road system for the development. If the foot path on the south western side has to be incorporated I strongly recommend that the property pictured left, is repositioned 90 degrees to the east so that the front of the building will look onto this area and provide valuable surveillance.



1.6 I am also particularly concerned with the footpaths on the eastern side that flow past the sides of properties, making these too more vulnerable to crime (pictured right).



1.7 The northern side will be very open and allow offenders free reign. The southern side will back onto nearby playing fields. However, I am glad to see the eastern side will have ample vegetation and defensive vegetation such as blackthorn. I hope that there will be no substantial gaps within this planted area that would allow anyone access from the Slade to the rear of any of these properties, or allow anyone to make their own access points in order to create short cuts and further unauthorised paths.

1.8 Further details on the layout of foot paths can be found within "Secure By Design (SBD) New Homes 2016" section 1, at para 16 entitled "Layout of roads and footpaths", para 8.1- 8.19, pages 14-17. Lighting for footpaths should meet BS5489:2013 standards.

1.9 I would like to know more about how the perimeters of all properties will be secured. I hope that the rear and side of all perimeters will comprise of at least 1.5m close boarded fencing, supplemented with 300cm trellis, or preferably 1.8m close boarded fencing. SBD New Homes 2016 "Dwelling Boundaries" refers at paras 10.1-10.8.4 refer, at pages 18-21.

1.10 I would like to know more with regard to bin storage and how all bins can be moved in order for waste collection.

1.11 I would like to know how the attenuation area on the south western side will be perimetered off. I trust it will be secured by either high defensive vegetation or secure fencing, so no one will be able to access this area.

1.12 I would like to have more details on how the whole of the development will be perimetered off, especially on the western side where it will border the current properties in situ? I would also like to know more regarding projected proposals for the undeveloped area to the south east that will border the playing fields (pictured right). Will this



footpath link up with the current footpath along Lancaster Way that leads out onto York Crescent?

- 1.13 I trust none of the properties will have recessed front doors, as they hinder the surveillance a house holder can obtain to observe who is at the front of their property.
- 1.14 I trust that all parking spaces will be within short distance from their respective properties.
- 1.15 I would like to have more details on how the rear gates will be positioned to allow householders to take out their bins and how the rear gates will comprise.
- 1.16 I note there will be a number of prominent gable end walls. I strongly recommend that as these areas are a focal point that they are perimetered off to prevent groups congregating, graffiti and ball games. The perimeter could either consist of hedge planting or picket fencing. SBD New Homes 2016 refers under "Gable End Walls" at para 12.1-12.2.2, page 21.
- 1.17 I trust there will be a management programme to maintain and keep in check the vegetation for the area.
- 1.18 I would like to know how the whole area will be lit. In particular I would like to know how the main focal perimeter footpaths will be lit.
- 1.19 I would also like to see 1 metre metal hooped railings around the communal areas.
- 1.20 Play equipment should be installed to meet BS EN 1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.
- 1.21 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 1.22 All litter bins should be of a fire retardant material.
- 1.23 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.
- 1.24 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 1.25 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).
- 1.26 Communal parking facilities should be lit to the relevant levels as recommended by BS5489:2013. See section 16 SBD Homes 2016 for the specific lighting requirements.

2.0 SECURE BY DESIGN (SBD)

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments

by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'.

It is worth noting that **Pre-build agreements** can also be applied for and if granted can be used in any marketing or promotion of the development. Application forms can be found on the Secured by Design website (www.securedbydesign.com).

Further information can be found at www.securedbydesign.com .

3.0 REFERRALS

3.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.

3.12 The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.

3.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

3.3 Department for Transport – Manual for Streets (Crime Prevention)

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police Architectural Liaison Officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

Safer Places highlights the following principles for reducing the likelihood of crime in residential areas (Wales: also refer to Technical Advice Note (TAN 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.
- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

4.0 CONCLUSION

- 4.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 4.2 **SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards it is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>**
- 4.3 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
- a) All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
 - b) All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
 - c) Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible)

windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

4.4 As stated I am unable to fully comment in specific detail on this application, as I would require more in depth information from any forthcoming Reserved Matters application.

4.5 To reiterate, my main concerns are:

- a) To know how the parking for residents and visitors will be implemented, preferably without any rear parking. (including what garages and/or car ports/parking spaces will be incorporated).**
- b) To know how the plots will individually be laid out and in particular how the rear of properties will be developed, in order to avoid any alleyways and where rear gates will be sighted and how they will comprise.**
- c) To know more on the designs of each property, in order to be able to deduce what areas provide active surveillance for where.**
- d) To know more regarding the layout for foot and cycle paths and if they can be reduced in number and how much permeability will be incorporated with these pathways.**
- e) To know how the perimeter for the rear of all properties will be secured, along with sides of properties that border nominated footpath areas.**
- f) To know more about how the attenuation area will be secured.**
- g) To know more as to how gable end walls will be protected to prevent ball games and youths congregating in such places.**
- h) To know more about the play area how, it will comprise and what equipment will be sourced.**

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely

Phil Kemp
Designing Out Crime Officer Western and Southern Areas
Suffolk Constabulary,
Raingate Street,
Bury St Edmunds,
Suffolk, IP33 2AP

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines.

Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

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/F216223
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 20/03/2018

Dear Sirs

Land to the east of Ely Road, Claydon
Planning Application No: DC.18/00861

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Continued/

OFFICIAL

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

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

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: PDL1

Copy: Richard.clews@struttandparker.com

Enc: Sprinkler information

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

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

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

Date: 20 March 2018

Planning Ref: DC/18/00861

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING

ADDRESS: Land to the east of Ely Road, Claydon

DESCRIPTION: 74 Dwellings

NO: HYDRANTS POSSIBLY REQUIRED: Required

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

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen
Water Officer

OFFICIAL



22 March 2018

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

By email only

Dear Gemma,

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

Application: DC/18/00861

Location: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Thank you for consulting Place Services on the above application.

Holding objection due to

- a) Insufficient information to enable the LPA to prepare a Habitats Regulation Assessment in relation to recreational disturbance on Natura 2000 sites.**
- b) Insufficient ecological information to provide certainty of impacts to protected species and priority species/habitat.**

The site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SSSI and SPA/Ramsar. Natural England's Impact Risk Zones require consultation on residential development within the 13 km ZOI specified to ensure mitigation for designated site impacts from recreational disturbance to be compliant with the Habitats Regulations 2017.

The LPA will need to prepare a project level HRA to assess potential impacts from the development (either alone or in combination with other plans and projects) and formulate any necessary mitigation measures. This is "typically a combination of 'on-site' informal open space provision and promotion (i.e. in and around the development site) and 'off-site' visitor access management measures (i.e. at the Natura 2K site)". A 2.6km daily walking route will need to be demonstrated and a proportionate financial contribution towards visitor management measures will need to be secured from the developer for in combination impacts in line with the emerging Recreational disturbance Avoidance and Mitigation Strategy (RAMS) for residential development within the 13 km ZOI specified.



This gap in ecological information for impacts on designated sites, Protected species, Priority habitats and species needs to be filled before determination of this application to enable the Local Planning Authority to demonstrate it has met its statutory duties for wildlife and biodiversity.

In addition, it is considered there is currently insufficient information to determine the impacts on bats, great crested newts and reptiles. This is because the Preliminary Ecological Appraisal (Geosphere Environmental Ltd, January 2018) highlights habitat features which potentially may be used by these species, but they are showed to be removed within the indicative site layout. As there are likely impacts, it is considered that an Ecological Impact Assessment is therefore required to support this proposal, with further surveys where appropriate and effective mitigation and compensation measures identified prior to determination.

It is recommended that an appropriate buffer to the adjacent broadleaved woodland (Priority habitat) is provided. This will reduce the potential impacts to these protected species, particularly bats. Any hedgerows which are proposed to be removed should be adequately compensated for within the development.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection.

Please contact me with any further queries.

Regards,

Hamish Jackson GradCIEEM BSc (Hons)

Junior Ecological Consultant

Place Services at Essex County Council

Hamish.Jackson@essex.gov.uk

Place Services provide ecological advice on behalf of 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.



18 October 2018

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

By email only

Dear Mark,

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

Application: DC/18/00861

Location: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

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

Holding objection due to

- a) Insufficient information to enable the LPA to prepare a Habitats Regulation Assessment in relation to recreational disturbance on coastal Habitats Sites.**
- b) Insufficient details to ensure an appropriate buffer of the Mixed Lowland Deciduous Woodland**

We have reviewed the submitted documents provided by the applicant by Geosphere Environmental Ltd, relating to the likely impacts of development on Protected & Priority species / habitats. This includes the Preliminary Ecological Appraisal (January 2018), Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018).

The submitted documents provide sufficient information on Protected & Priority species subject to securing a European Protected Species Mitigation Licence for Great Crested Newts and mitigation and enhancement measures as a condition of any consent.

However, as highlighted in Place Services initial response (March 2018), the LPA needs to prepare a Habitat Regulations Assessment for this application, as the site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA & Ramsar.



This application falls within Annex 1 (larger scale residential developments) of Natural England's integrity test for HRA Stage 2: Appropriate Assessment¹. Therefore, Mid Suffolk District Council will need to prepare a HRA Appropriate Assessment to be approved by Natural England. This will assess potential impacts from the development (either alone or in combination with other plans and projects) to the Stour & Orwell Estuaries SPA & Ramsar and formulate any necessary mitigation measures which need to be delivered at the coastal Habitats Site.

To inform the necessary mitigation measures, the applicant must provide a map of a circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PROW) to the Local Planning Authority to demonstrate that adverse effects on site integrity from the development alone can be avoided. A proportionate financial contribution in line with the emerging Suffolk Coast RAMS will also need to be secured, towards visitor management measures at the coastal Habitats Sites. This will need to be provided prior to first commencement of house building, to avoid in combination impacts from other plans and projects.

In addition, we still need to ensure that a functional buffer zone to the Mixed Lowland Deciduous Woodland (Priority Habitat) is secured. The submitted Mitigation Strategy and Enhancement Plan highlights that a three to five metre buffer of rough grassland will be maintained around the site margins on the northern, eastern and southern boundaries of the site and a 10m construction exclusion zone will also be installed around a badger sett. These plans provide suitable recommendations to mitigate Protected and Priority species. However, they don't provide sufficient details that an appropriate buffer will be provided, to avoid negative impacts to the Mixed Lowland Deciduous Woodland.

These negative impacts are primarily caused when gardens are situated towards woodlands. This is because it can often cause increased garden waste dumping, which can result in non-native plant species encroaching on the woodland. It can also result in garden encroachment of individual properties towards the woodland and creation of personal household pathways into the woodland.

Therefore, to minimise these potential risks and ensure a functional buffer zone for Priority Habitat woodland, it is recommended that a revised layout plan should be submitted. This should show the positions of the houses on the eastern boundary facing towards the woodland with a road in between to increase the distance of the woodland. The rough grassland buffer should still be provided for Protected and Priority species (Gt Crested newts and reptiles) which should be retained within public ownership to ensure appropriate management.

If the above recommendations are not feasible then a revised layout plan at minimum should include the houses on the eastern boundary being set back the equivalent height of the mature trees on the eastern boundary. This measure will guarantee the future safety of the properties from potential falling trees. This boundary should be planted with scrub habitat to provide a barrier to the Priority Habitat woodland from garden waste dumping, while providing a suitable habitat for the highlighted Protected and Priority species.

¹ In line with the recent Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Habitats Site. Therefore, all proposals which are within the scope of the emerging Suffolk Coast RAMS must proceed to HRA Stage 2 (Appropriate Assessment).



Consequently, until the recommended additional information has been submitted for this application, we are unable to remove our holding objection to this application.

We look forward to working with the LPA and the applicant to overcome the above concerns.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)

Place Services at Essex County Council

Hamish.Jackson@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



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

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

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km² within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated ‘dogs-off-lead’ areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

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

However, the unique draw of the above Habitats Sites means that, even when well-designed, ‘on-site’ provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together ‘in combination’. We therefore advise that consideration of ‘off-site’ measures (i.e. in and around the relevant Habitats Sites) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases.

As such, in the interim period before the RAMS is adopted, a financial contribution should also be agreed with and collected from the developer, prior to commencement, on the basis that it can be used to fund strategic ‘off site’ measures (i.e. in and around the relevant Habitats Sites). These measures should be targeted towards increasing the relevant Habitats Sites resilience to recreational pressure and be in line with aspirations of the emerging RAMS. As an example in this interim period, this could include funding towards existing wardening schemes at the relevant Habitats Sites. A suitable delivery mechanism for the measures must be agreed to secure them and ensure they are implemented from the first occupation of dwellings. Alternatively, we understand that it may be acceptable at the outline planning stage to include a suitably-worded planning condition which secures full adherence with the emerging Suffolk Coast RAMS at the Reserved Matters stage.

Once the RAMS has been adopted, a financial contribution should be secured from these developments prior to commencement.

² Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*



20 February 2019

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

By email only

Dear Jo,

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

Application: DC/18/00861

Location: Land To The East Of Ely Road Claydon Suffolk

Proposal: Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

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

No objection subject to conditions to secure:

- a) Mitigation towards visitor management measures at the Stour & Orwell Estuaries SPA & Ramsar site, from the development alone and in combination of other plans and projects;**
- b) ecological mitigation and enhancements.**

Summary

We have reviewed the submitted documents provided by the applicant by Geosphere Environmental Ltd, relating to the likely impacts of development on Protected & Priority species / habitats. This includes the Preliminary Ecological Appraisal (January 2018), Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018).

In addition, we have reviewed the map to demonstrate that a circular dog walking route of 2.7 km or more is present within links to surrounding public rights of way (PRoW), which was provided to enable the LPA to have sufficient information to prepare a Habitats Regulation Assessment for this application.

We have also reviewed the details to ensure an appropriate buffer to the Mixed Lowland Deciduous Woodland will be present for this proposed development.



After review of the submitted information, we are satisfied that there is sufficient ecological information available for determination of this application.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We support the reasonable biodiversity enhancements, which should also be secured by a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

The ecological mitigation and enhancement measures identified in Preliminary Ecological Appraisal (January 2018), Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018) should be secured and implemented. This is necessary to conserve Protected and Priority species.

As highlighted within Place Services previous ecological responses and Natural England's Consultation response (Ref: 272939, February 2019), this site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA & Ramsar site. Therefore, Mid Suffolk District Council will need to prepare a HRA Appropriate Assessment to be approved by Natural England. This is undertaken to avoid likely 'adverse impacts' to these coastal Habitats sites by securing mitigation measures for the development (either from the development alone or in combination with other plans and projects).

The developer has now provided sufficient information to support the provision of the Habitats Regulations Assessment by Mid Suffolk District Council and overcome Place Services initial holding objection. Therefore, mitigation measures included within the HRA will need to be agreed and secured by legal agreement prior to commencement, to ensure implementation of mitigation measures prior to occupation.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Great Crested Newt and Amphibian Survey (June 2018), Bat Detector Survey (July 2018), Badger Survey and Outline Mitigation Strategy (September 2018), Mitigation Strategy and Enhancement Plan (September 2018) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.



This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. CONCURRENT WITH RESERVED MATTERS: SUBMISSION OF A COPY OF THE EPS LICENCE FOR GREAT CRESTED NEWTS

"Works shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorizing the specified activity/development to go ahead; or*
- b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence."*

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 and s17 Crime & Disorder Act 1998.

3. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

"A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.

The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed.*
- b) Ecological trends and constraints on site that might influence management.*
- c) Aims and objectives of management.*
- d) Appropriate management options for achieving aims and objectives.*
- e) Prescriptions for management actions.*
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) Details of the body or organization responsible for implementation of the plan.*
- h) Ongoing monitoring and remedial measures.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."



Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

4. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

"A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory."

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Junior Ecological Consultant
Hamish.Jackson@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



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

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

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

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

However, the unique draw of the above Habitats Sites means that, even when well-designed, 'on-site' provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together 'in combination'. We therefore advise that consideration of 'off-site' measures (i.e. in and around the relevant Habitats Sites) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases.

As such, in the interim period before the RAMS is adopted, a financial contribution should also be agreed with and collected from the developer, prior to commencement, on the basis that it can be used to fund strategic 'off site' measures (i.e. in and around the relevant Habitats Sites). These measures should be targeted towards increasing the relevant Habitats Sites resilience to recreational pressure and be in line with aspirations of the emerging RAMS. As an example in this interim period, this could include funding towards existing wardening schemes at the relevant Habitats Sites. A suitable delivery mechanism for the measures must be agreed to secure them and ensure they are implemented from the first occupation of dwellings. Alternatively, we understand that it may be acceptable at the outline planning stage to include a suitably-worded planning condition which secures full adherence with the emerging Suffolk Coast RAMS at the Reserved Matters stage.

Once the RAMS has been adopted, a financial contribution should be secured from these developments prior to commencement.

¹ Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*



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

21/03/2018

For the attention of: Gemma Pannell

Ref: DC/18/00861 Land to the east of, Ely Road, Claydon, Suffolk

Thank you for consulting us on the outline application for the erection of up to 74 dwellings, public open space and supporting site infrastructure including access (with means of access to be considered).

This letter sets out our consultation response on the landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

Recommendations

The following points highlight our key recommendations for the submitted proposals:

- 1) The Landscape and Visual Impact Assessment (LVIA) refers to the views from the dwellings on the western boundary as 'highly sensitive', yet little is being proposed in terms of mitigation. Therefore, more information is required within the LVIA to address the relationship and mitigation between the proposed development site and surrounding buildings, in particular Hereford Drive. Specific scaled sections, which identify how the visual impact is mitigated would be useful to justify the analysis within the LVIA.
- 2) The LVIA fails to highlight the neighbouring current outline planning application (ref. 1856/17) for up to 300no. dwellings. Consequently, it also fails to provide any analysis of the cumulative impact that the development will have on the landscape and how the proposals will mitigate any negative visual effects of this both within and beyond the village settlement edge.
- 3) It would be advised that the total dwelling numbers are reduced to allow for a landscape buffer on the northern and north eastern boundary. This would allow for further visual mitigation and landscape enhancements along the PRoW and woodland parcel, which in turn will reduce the impact on the existing settlement boundary.
- 4) A landscape strategy needs to be produced to demonstrate what landscape principles will be applied to the proposal if the application is approved. The submitted landscape strategy should include the following sections:
 - a. Context and character
 - b. Landscape masterplan (Inc. visuals/perspectives)
 - c. Public open space
 - d. SUDs strategy
 - e. Boundary treatments (Inc. sections)
 - f. Hard landscape Strategy

g. Soft landscape (Trees and Shrubs) Strategy

- 5) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 5 years, to support plant establishment. SuDS features such as attenuation basins should also be built into the landscape management plan to ensure they maintain their functionality as well as aesthetic.
- 6) A detailed boundary treatment plan and specification will need to be submitted, if the application is approved.

The proposal

The application plan sets out the outline application for the erection of up to 74 dwellings, public open space and supporting site infrastructure including access (with means of access to be considered). The proposal site lies on the eastern edge of the village of Claydon, to the east of Ely road. The Site inhabits an area of approximately 3.5 hectares and currently comprises of two rectangular arable fields divided by a mature, native hedgerow running east to west, with a large hedgerow gap to the west where existing dwellings are situated.

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape and Visual Impact Assessment, Design and Access Statement and Indicative layout.

As part of the outline application submission the concept masterplan shows the areas designated for residential development and open space including an attenuation pond, which is located on the southern boundary of the site. The current layout fails to suitably demonstrate how an appropriate and connected drainage system responds to the layout. Therefore as the proposal develops, a greater level of detail will be required. This could include the use of swales on road verges or buffer zones, as well as rain gardens and other balancing ponds.

Considering the proposals location outside the current Claydon built envelop, and the cumulative impact this proposal and outline planning application (ref. 1856/17) would have on the character of the settlement, it would be advised that that the dwelling numbers are reduced where possible. This would also allow for further landscape mitigation on the northern and north eastern boundary, which would provide visual mitigation and landscape enhancements, which in turn will reduce the impact on the existing settlement built envelope.

The LVIA has been produced to the appropriate guidance with suitable viewpoints shown. However, the report suggests that “the greatest visual impact identified was upon users of Public Footpath E120 009/X” and “occupants of Winchester Gardens and Hereford Drive”, yet the proposed layout has not applied suitable mitigation methods to alleviate this. Currently, the indicative layout has proposed a small landscape buffer between Hereford Drive and the proposed development dwellings, but due to the sloping topography it is not felt that this will have any considerable mitigation benefit. Moreover, there is no landscape buffer between dwellings and the PRow on the northern boundary which would diminish the PRow user experience. Because of this, it is advised that more information is required within the LVIA to address the relationship and mitigation between the proposed development site and surrounding buildings and PRowS. Specific scaled sections, which identify how the visual impact is mitigated, would also be useful to justify the analysis within the LVIA.

It would also be recommended that more information is sort to understand the cumulative impact of this proposal and outline planning application (ref. 1856/17) on Claydon and how any negative visual impacts can be mitigated through this development site, therefore visual representations of the proposal sited within the landscape would help to visualise the degree the proposal affects the existing landscape.

The Design and Access statement only provides descriptive information on the landscape, and does not provide sufficient principles of how the landscape will be designed as the application develops. Therefore it would be suggested that a Landscape Strategy is provided, which looks at setting principles for landscape features and implies how the sites character and context is going to be

applied and enhanced. Suggested document sections should include; context and character, public open space, SUDs, boundary treatments (Inc. sections), hard landscape and soft landscape.

Likely impact on the surrounding landscape

The proposed development will inevitably have an impact on the existing built envelope of Claydon and therefore it is important that the existing landscape setting and character is protected, and where possible, enhanced. The Mid Suffolk Core Strategy picks up on this principle: "Objective SO 4: To protect, manage, enhance and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character." It is felt that even though the proposed development is enclosed by large woodland parcels, it is important to identify that the development will negatively impact on nearby dwellings and heritage assets. Therefore landscape enhancements should be at the forefront of the scheme. This should include the implementation of large landscape buffers and improvements to the villages overall green infrastructure, which in turn will help set a precedent for any future development.

The application site is located within the Rolling Estate Farmlands Landscape Character Area (LCA). The key characteristics of this LCA include gently sloping valley sides and plateau fringes, generally deep loamy soils, an organic pattern of fields modified by later realignment and important foci for early settlement. Due to the enclosure pattern in the area there is an expectation that landscape areas are enhanced, and estate features and woodland planting is safeguarded throughout the development of this proposal. This should be evidenced in the recommended landscape strategy.

Proposed mitigation

The indicative proposal shows an area of water attenuation and green open space on the south western edge of the proposed development. As part of this feature, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting. This should be referred to in the proposed landscape strategy.

If approved, an appropriately detailed landscape and boundary plan will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal, suitable to limit any negative visual effect the proposal may have on the existing settlements.

Please feel free to contact me with any queries, questions or clarifications.

Yours sincerely,

Ryan Mills LMLI BSc (Hons) MSc
Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



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

13/02/2019

For the attention of: Jo Hobbs

Ref: DC/18/00861 Land to the east of, Ely Road, Claydon, Suffolk

Thank you for re-consulting us on the outline application for the erection of up to 73 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works (with some matters reserved).

This letter sets out our recommendations relating to the revised sketch layout (Dwg no. SK 01 Rev. H) and Landscape and Visual Impact Assessment (LVIA) (Document ref: 17-1199 rev. 7).

We welcome the changes that have been made to the sketch layout. Since we were last consulted the public open space (POS) has been amalgamated into one larger space, houses now provide passive surveillance onto POS and generally the arrangement responds to the existing settlement layout well.

The revised LVIA has sought to address the concerns relating to cumulative impact. The assessment is considered acceptable and has concluded that the only visual receptor likely to experience cumulative effects was the users of Public Footpath E120/009/X through a sequential experience of both developments. However, it's thought that by amending the layout there are more opportunities for landscape enhancements along this route. Whereas in terms of landscape, there is a slight adverse cumulative landscape effect upon the arable character of the Site and Claydon.

If minded for approval I recommend that the following landscape and design aspects are considered:

- 1) A landscape strategy has still not been produced. This should illustrate the landscape principles that will be adhered to as part of any future reserved matters application. This should include the following sections:
 - a. Context and character
 - b. Landscape Design strategy
 - c. Landscape masterplan (Inc. visuals/perspectives)
 - d. Public open space
 - e. SUDs strategy
 - f. Boundary treatments (Inc. sections)
 - g. Hard landscaping Strategy
 - h. Tree Strategy
 - i. Planting Strategy
- 2) SUDs should be explored in greater detail as there are many opportunities to include these as part of the streetscape and landscape design due to the sites topography. Assurance is also

needed that the indicative drainage pond area is sufficient for its purpose and is easily accessed for long term management.

In the event that approval of this application is forthcoming then the following reserved matters conditions should be considered:

1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING

Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other construction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

3. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting. Tree pit details will also need to be provided for the different planting environments proposed i.e. planted in hard landscaping, close to road boundaries and within the public open space (POS).

4. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

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

Yours sincerely,

Ryan Mills BSc (Hons) MSc CMLI
Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

From: David Pizzey
Sent: 02 March 2018 10:38
To: Gemma Pannell
Cc: BMSDC Planning Area Team Green
Subject: DC/18/00861 Land To The East Of, Ely Road, Claydon, Suffolk

Gemma

I have no objection in principle to this application as there appears to be little conflict between the development, based upon the indicative layout, and any significant trees/hedges on site. The accompanying Tree Survey provides a generally accurate appraisal of existing trees although a detailed Arboricultural Impact Assessment has not yet been undertaken to indicate any specific losses or areas requiring precautionary measures and/or mitigation. This should be provided as part of the application if a final layout design is available.

If you are minded to recommend approval we will also require other information including a detailed Arboricultural Method Statement and Tree Protection Plan in order to help ensure appropriate protection measures for trees scheduled for retention. Ideally this should be submitted as part of the application but can be dealt with under condition if necessary.

Regards

David Pizzey FArborA
Arboricultural Officer
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Babergh and Mid Suffolk District Councils – Working Together

Planning Application – Consultation Response

Planning Application Reference:	DC/18/00861
Site:	Land To The East Of Ely Road Claydon
Proposal:	Outline Planning Application (with means of access to be considered) - Erection of up to 73 dwellings, public open space and supporting site infrastructure including access.
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	15/01/2020

1. Policy position

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA003.

2. Infrastructure Delivery Plan (IDP) position

The IDP (July 2019) sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 22nd July 2019 as evidence which supports the Joint Local Plan and is an iterative document which will change over time dependent on changing infrastructure capacity, requirements and priorities.

The application site is part of the proposed site allocations of the emerging Joint Local Plan, policy reference LA003. For the purpose of this response, and to understand the impact on infrastructure capacity, the content of the IDP has been considered together with the existing planning permissions and responses from infrastructure providers.

Set out below are the current planning applications (over 10 dwellings) and emerging Joint Local Plan land allocations in Barham & Claydon:

Existing Permissions

- 0928/17 Land At Norwich Road, Barham – Full permission for 10 dwellings
- 0191/17 Land Rear Of De Saumarez Drive, Barham – Full permission for 23 dwellings
- 0085/17 Land Between Norwich Road And Pesthouse Lane, Barham – Outline permission for 20 dwellings
- 1832/17 Land To The West Of Old Norwich Road And To The East Of The A14 Claydon – Outline permission for 190 dwellings. Emerging Joint Local Plan allocation reference LA102, for 190 dwellings.

Planning applications awaiting determination (other than this application)

- 1856/17 Land Off Norwich Road Barham And Claydon – Outline application for 269 dwellings. Emerging Joint Local Plan allocation reference LA002, for 270 dwellings.

Other emerging Joint Local Plan site allocations

- LA001 - Land to the east of Norwich Road, Barham – 325 dwellings

There are several essential infrastructure needs for Barham & Claydon that are identified:

- Education

The IDP states that within Barham & Claydon a new pre school setting for 60 places is needed with proposed land allocation on LA002. A new primary school is also to be provided, also on site LA002, to supply growth of Claydon & Barham. This new primary school would have the potential to provide for this development together with the committed growth and other Joint Local Plan proposed allocations. For the secondary school provision, the expansion of Claydon High School from 818 to 900 places is planned, to provide for this development together with committed and planned growth of the Joint Local Plan.

- Transport

The IDP states that within Barham & Claydon, contributions towards the new footway links and bus stops would be required as well as highway mitigation measures. Specific site details and required contributions are provided through the County Council Highway response.

- Health

The local practice is the Barham & Claydon Surgery, where the IDP refers increased capacity for this locality being required as a result of committed and Joint Local Plan growth. Therefore, developer contributions via the Community Infrastructure Levy (CIL) may be required to meet the cost of additional health provision arising.

3. Summary

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

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA003.

The scheme is therefore supported by the Strategic Planning Team.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

From:Nathan Pittam
Sent:Tue, 13 Mar 2018 08:50:10 +0000
To:Gemma Pannell
Cc:BMSDC Planning Area Team Green
Subject:DC/18/00861: EH - Air Quality

Dear Gemma

EP Reference : 238597

DC/18/00861: EH - Air Quality

Land To The East Of, Ely Road, Claydon, IPSWICH, Suffolk.

Outline Planning Application (with means of access to be considered) - Erection of up to 74 dwellings, public open space and supporting site infrastructure including access.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I believe that the proposed scale of development is unlikely to result in a deterioration of the existing good air quality experienced in and around Claydon.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Consultation Response Pro forma

1	Application Number	DC/18/00861 Land to the East of, Ely Road, Claydon	
2	Date of Response	13/03/18	
3	Responding Officer	Name:	Karolien Yperman
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	The Heritage Team has no comments to make on this proposal.	
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.		
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		

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.

From: Iain Farquharson
Sent: 21 March 2018 15:10
To: BMSDC Planning Area Team Green
Subject: M3 238598: MSDC Planning Consultation Request - DC/18/00861

Dear sir/Madam

This department does not object to the proposal but we request a suitably worded condition is included should permission be granted to ensure the best possible standards in terms of sustainability can be achieved

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

Thank you

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027
//iain.farquharson@baberghmidsuffolk.gov.uk

From: Nathan Pittam
Sent: 03 April 2018 09:34
To: Gemma Pannell
Cc: BMSDC Planning Area Team Blue
Subject: DC/18/00861: EH - Land Contamination

Dear Gemma,

EP Reference : 238596
DC/18/00861: EH - Land Contamination
Land To The East Of, Ely Road, Claydon, IPSWICH, Suffolk.
Outline Planning Application (with means of access to be considered) -
Erection of up to 74 dwellings, public open space and supporting site
infrastructure including access.

Many thanks for your request for comments in relation to the above application. I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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