

**Advice for Needham Market Town Council in formulating their  
formal response to Planning application DC/21/06882 – Land  
northwest side of Barking Road, Needham Market**

**January 2022**

***Needham Market Town Council has commissioned Compasspoint Planning and Rural Consultants to assist with the response to planning application reference Number DC/2021/06882.***

## **Section 1: Application Details and Description**

- 1.1 The application comprises 279 dwellings (including 100 affordable dwellings) on the north-west side of Barking Road, Needham Market. The application is submitted in outline with all other matters, save for access, reserved for future applications.
- 1.2 The application is a resubmission of an application submitted to Mid Suffolk District Council on 10<sup>th</sup> November 2020 and refused on 18<sup>th</sup> February 2021 under Ref No: DC/2020/05046. The resubmission is made on behalf of the same applicants - a small consortium of landowners - by Parker Planning Services. The application is made in outline and includes an indicative masterplan which provides some detail of the potential layout. Many of the details supporting the application are the same as those, which supported the previous application although they have been updated. It should be noted that there was an additional previous refusal on the site in August 2017 (Reference No: 16/3506)
- 1.3 The current use of the site is agricultural. The application requires the creation of a new access into the site from Barking Road. The site will be served off this single point of access with an 'emergency/tertiary' access shown from Quinton Road. The application provides for 558 parking spaces – 2 per dwelling. There appears to be no signs of land contamination and no diversions of any existing Public Rights of Way are proposed. It proposes a Sustainable Urban Drainage System. Part of the site is within Flood Zone 3 and part is within Flood Zone 2. The site is not specifically allocated for residential development or any other purpose and in policy terms falls within 'countryside.'
- 1.4 The mix of housing proposed is as follows.

**Market Housing**

3 x 1 bed

30 x 2 bed

88 x 3 bed

58 x 4+ bed

**Affordable Home Ownership**

9 x 1 bed

49 x 2 bed

37 x 3 bed

5 x 4+ bed

The overall housing numbers are the same as the previous application although the sizes of the properties have been adjusted. The current application provides more

smaller 2 bed open market houses, less 3 bed and more 4+ bed dwellings. In the case of affordable housing – all are proposed to be affordable home ownership with no social rented: the mix has been adjusted to provide more 3-bedroom properties and less 2-bedroomed properties.

- 1.5 There does not appear to have been any pre-application discussion between the applicants and the District Council to clarify whether the revised application and supporting documents would overcome the reasons for the two previous refusals. As with the previous application there does not appear to be evidence in this outline application that there is developer involvement.
- 1.6 This time the application is accompanied by a concept Master Plan, a Design and Access Statement, Transport Assessments, Floodrisk assessment, an ecology report, Landscape and Visual Appraisal and a Planning Supporting Statement in addition to the submitted form and plans.
- 1.7 The proposed layout of both the 2020 and 2021 applications are shown below for comparison.



*Extract from Landscape and Visual Impact Appraisal (Parker Planning Services) – 2020 Application*



- 2.3 The site was assessed through the SHELAA, which was updated in October 2020 ahead of the publication of the Pre-Submission (Regulation 19) Version of the Babergh Mid Suffolk Joint Local Plan (Site SS0028). The SHELAA identifies the site as suitable for development in principle subject to further work to be undertaken to investigate the following issues:
- Safety of access through a flood zone
  - Part of the site lies within a Mineral Safeguarding Area
  - Potential for Floodrisk impacts on nearby Site of Special Scientific Interest
- 2.4 The application submitted in November 2020 (DC/2020/05046) was refused on 18<sup>th</sup> February 2021 for the following reasons:
- Principle of development – site is within open countryside and outside of the settlement boundary
  - Single point of access and poor pedestrian and cycle connections to the rest of the town and to community facilities
  - Landscape impact
  - Access is at risk of flooding
  - Insufficient information in respect of air quality
  - Insufficient information in respect of ecology
  - Insufficient information in respect of light and noise pollution
  - Insufficient information around minerals.

### **Section 3: Current Planning Policy context**

- 3.1 The site lies outside of the Settlement Boundary for Needham Market and for Barking as identified in the Adopted and Emerging Local Plans and the emerging Needham Market Neighbourhood Plan. This has not changed since the previous application was submitted.
- 3.2 The site lies outside of the Conservation Area for Needham Market and there are no formal wildlife designations on site. This position remains unchanged since the previous application.
- 3.3 The site is not allocated for residential development in the Adopted Local Plan, or the emerging Local Plan or the emerging Neighbourhood Plan. This position remains unchanged however both the emerging BMSJLP and the Needham Market Neighbourhood Plan have progressed since the previous application was determined.
- 3.4 The Pre-Submission Version of the BMSJLP was submitted for Examination to the Secretary of State on 31<sup>st</sup> March 2021. Examination hearings began in June 2021 and were paused in July 2021. They were resumed in September 2021 and further paused in December 2021. It may be that the timing of the resubmission of the application is to take advantage of the current pause in the Local Plan progress.

- 3.5 As part of the BMSJLP examination programme, in September 2021, the District Council published their updated housing and spatial distribution information. This included information since the base date of the Plan – 1<sup>st</sup> April 2018 up to 1<sup>st</sup> April 2021. This information reveals that there had been 301 dwellings completed in the parish between 2001 and 2020, In terms of outstanding permission in the parish i.e. those dwellings with permission that have not been constructed this had changed from 363 at 01/04/18 to 459 at 01/04/21.
- 3.6 Since the previous application was determined, the Needham Market Neighbourhood Plan has been successfully examined and the Independent Examiner’s report was published in May 2021. The Neighbourhood Plan Referendum is due to take place on 24<sup>th</sup> February 2022. Given that the Neighbourhood Plan has been examined, it is a technically correct planning document and therefore can be given some weight in the consideration of this application by the District Council. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a post-examination draft Neighbourhood development plan, so far as material to the application.
- 3.7 Should the Needham Market Neighbourhood Plan be successful at Referendum on 24<sup>th</sup> February, and that this falls before the application is determined, it can be given full weight in the decision-making process and indeed will be the most up to date part of the development plan. The Neighbourhood Plan does not make any additional allocations for dwellings within the Neighbourhood Plan area. The reason for this is because of the high level of existing commitments and the level of change that will occur within the town as those commitments and allocations come forward during the plan period (2037). The Neighbourhood Plan policies instead provide guidance for applications that may come forward as windfall sites within the existing built-up area boundary as well as any detailed applications that may be submitted in respect of the allocations mentioned above.

## **Section 4: Other Consultation responses**

- 4.1 A number of responses from statutory consultees have already been received in respect to the application as follows:
- SCC (Floodrisk) – holding objection until further information is received to address previous concerns.
  - SCC – recommending refusal due to previous concerns not being addressed
  - Place Services (Landscape) – recommend refusal on the basis of adverse impact on the landscape
  - Strategic Housing – the revised schedule of house sizes meets previous concerns

- Suffolk Preservation Society – objection on landscape grounds – previous concerns have not been addressed; lack of weight given to Neighbourhood Plan
- No objections from Natural England, Anglian Water

There are currently a handful of objections from local residents, the majority of which are objecting on the following grounds:

- Flood risk
- Traffic and Highway issues relating to Barking Road, Chainhouse Road, Quinton Road, and the town centre; rat running.
- Pressure on schools and GP surgery

## **Section 5 : Key Issues**

5.1 The key issues in respect of this application are the same as those cited in the previous refusals; a number of which appear not to have been addressed by the revised application. These are as follows:

- Floodrisk – principally at the access to the site which is a single point of access
- Highways – traffic generation and impacts on Barking Road and junction of Barking Road and High Street; single point of access; emergency access from Quinton Road
- Accessibility of site and connections to the rest of the town for pedestrians and cyclists
- Consistency with adopted and emerging development plan policy – Local Plan and Neighbourhood Plan
- Housing Land Supply – Mid Suffolk can demonstrate an appropriate housing land supply
- Impact on landscape; erosion of landscape buffer between Needham Market and Barking

## **Section 6 – Assessment against the Adopted Development Plan and Emerging Development Plan policies**

6.1 The adopted Development Plan for the area is the Mid Suffolk Core Strategy (2008) and the Mid Suffolk Core Strategy Focussed Review (2012) and the saved policies of the Mid Suffolk Local Plan (1998).

6.2 As noted earlier, the replacement for the Core Strategy – the Babergh Mid Suffolk Joint Local Plan – is currently at Examination Stage. The Needham Market Neighbourhood Plan was successfully examined in May 2021 and will be the subject of a local referendum on 24<sup>th</sup> February 2022. It may therefore become part of the statutory ‘Development Plan’ for the area before the application is determined.

- 6.3 The application site lies within an area designated as countryside in the adopted Mid Suffolk Core Strategy and lies outside the defined settlement boundary of Needham Market. The Adopted Development Plan policies seek to restrict residential development in the countryside as set out in Core Strategy policies CS1 and CS2 which state that only development for rural exception housing will be permitted. The proposal includes both open market and affordable housing and does not represent a rural exception site for the purposes of the Core Strategy, Therefore, the erection of up to 279 dwellings on the site would be directly contrary to the adopted development plan.
- 6.4 As noted earlier, at the time of the previous outline application for 152 dwellings which was refused in 2017, the District Council could not demonstrate a 5-year housing land supply and therefore the “tilted balance” approach outlined in the National Planning Policy Framework (NPPF) paragraph 11 (d) i. was engaged. Paragraph 11 d) requires that where there are no relevant development plan policies or the policies that are most important for determining the application are out-of-date, that planning permission should be granted unless policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF when taken as a whole. The District Council felt that due to a shortfall in the housing supply that they could not refuse the application on the grounds that the development fell outside the settlement boundary and in the countryside. The site was recommended for approval by officers on this basis; but refused by the Planning Committee.
- 6.5 When the 2020 application was determined in February 2021, Mid Suffolk District Council’s Annual Monitoring Report published in November 2020, indicated that Mid Suffolk had a 7.67-year supply of adequate housing land against the five-year requirement with a surplus of housing across the district of over 1,500 homes. Given that Mid Suffolk were able at that time to demonstrate a five-year supply of housing in accordance with the NPPF, adequate housing could be achieved without having to develop this site. Therefore, Mid Suffolk’s adopted policies with regards to development in the countryside outlined above were engaged. Indeed an objection to the principle of the application was justified on these grounds and was one of the reasons for the application’s refusal.
- 6.6 In November 2021, Mid Suffolk published its most recent Housing Land Supply Position Statement . The statement has been produced by independent consultants. Lichfields. The statement indicates that the District had a 9.57-year land supply with a surplus of 2,446 housing units. The applicant’s planning statement fails to address this issue in any detail. Given that the housing land supply exceeds 5 years, as the emerging Plan is not yet adopted, the existing adopted Local Plan can be attributed some weight and is still a relevant policy consideration, which includes Policies CS1,



CS2 and H7 all of which seek to restrict housing development outside of settlement boundaries and in the open countryside and therefore the application site. Even if more weight was attributed to the emerging Local Plan, the application is still in conflict with its policies – specifically SP03 and SP04 which seek to direct new development within existing settlements boundaries and through specific allocations.

- 6.7 The housing target for Needham Market to 2037 as identified in the emerging Local Plan has already been met. There will also no doubt be other individual permissions granted for individual dwellings since the base date of the plan or other windfall sites that will come forward within the built up area of the town over the plan period which will be added to this commitment. Whilst it is accepted that the housing requirement is a minimum figure and does not automatically preclude further development from taking place, an additional 279 units as proposed by the application results in significant additional development in Needham Market which has not been strategically allocated and puts considerable strain on the existing infrastructure of the town (specifically schools and GP provision).
- 6.8 The Needham Market Neighbourhood Plan makes it clear at paragraph 6.1.7 of the Referendum version that *“The Needham Market Neighbourhood Plan does not anticipate making further allocations for new development given the high levels of outstanding commitment and the level of change that will occur as those commitments and allocations come forward during the plan period. The Neighbourhood Plan policies will instead provide guidance for applications that come forward on the sites identified in the emerging BMSJLP plus any windfall sites that may come forward within the existing built-up area boundary (settlement boundary).”*
- 6.9 The proposal therefore clearly conflicts with the both the adopted and emerging local and neighbourhood planning policy covering the area. The principle of development on this site is in clear conflict with the relevant policies for the reasons given above.
- 6.10 Whilst the matter of the principle of development in this location, which was the primary reason for the previous refusal, is still not satisfied by the revised application there were a number of other reasons for refusal that the revised application should seek to address. As described in Sections 7-12 below, there are also several other key issues which the application as proposed presents.

## Section 7: Highway Safety and Access

- 7.1 Concerns over highway safety and access resulted in a reason for refusal of the two previous applications. The issue was raised by a number of local residents who have objected to the 2020 and 2016 applications. The 2020 application for 279 dwellings was refused on the basis of a single point of access which was considered to be inadequate to serve the number of dwellings and additionally that point of access was at risk of pluvial and fluvial flooding. The current application represents a slightly revised layout but with still with a single point of access and with that access still at risk of flooding. A second emergency or tertiary access is proposed to Quinton Road which joins up with a public bridleway at The Causeway. The bridle way status of the route would allow the public to use it on foot, horseback or by cycle but does not confer any vehicular access or use. Therefore it is unclear whether the proposed tertiary/emergency route is actually achievable.
- 7.2 No detailed information has been provided and it is considered that this could result in a significant danger to highway safety, as the egress onto Quinton Road does not provide for the required visibility due to the existing bends in the road in both directions. There are properties on Quinton Road who use on street parking, narrowing it for passing traffic and its proximity to the school also results in congestion in this area. It is believed that the track to the football training ground is in third party ownership and therefore it is unclear how realistic a prospect this access really is. Whilst the potential for access onto Quinton Road is described as an emergency access only, there are no firm details in the application about how this would be achieved and regulated. It is therefore highly likely that an unregulated access in this location would be used by residents and visitors to any dwellings located on the northern part of the site as their main entrance and exit point rather than Barking Road, causing highway safety issues and congestion. Therefore, the proposal potentially remains reliant on a single point of access that is within flood zone 3 and therefore has a high probability of flooding. The SCC Highways objection noted that their previous concerns have not been addressed and are recommending refusal.
- 7.2 The previous application was also considered to be inadequate in terms of the pedestrian and cycle connection between the site and the rest of the town – specifically the town centre and also facilities such as the school. Although the housing layout has been slightly amended it still does not provide for new connections between the site and the town and pedestrians and cyclists will still need to use the Barking Road access or possibly the Quinton Road access depending upon any agreed access arrangements. The revised application fails to adequately address this reason for refusal.
- 7.3 Therefore, it can only be concluded that the proposal is not a sustainable location for new housing and residents of this development would still be reliant on a private car for day to day needs which is not a sustainable form of development which

promotes walking, cycling and public transport. The proposal is therefore in conflict with local and national policy and the presumption in favour of sustainable development.

## **Section 8: Landscape**

- 8.1 The previous application was refused on the basis of unacceptable impact upon the landscape and the landscape would be irreparably and detrimentally altered through its development. This area provides an important landscape buffer and gap between Needham Market and Barking, through the transition of an urban area to a rural area. The site slopes and is in a visually prominent and elevated position on the approach into Needham Market. The District Council's landscape advisors Place Services has indicated that the revised application still has not addressed their concerns and that their original objection on landscape grounds still stands. This would bring the proposal into conflict with Core Strategy policy CS5, Local Plan policies CL2 and GP1 and paragraph 174 (b) of the NPPF, undermining the character and appreciation of the intrinsic value of the landscape in isolation and within its wider context.

## **Section 9: Floodrisk**

- 9.1 Flood risk was another key consideration in the determination of the previous application. Part of the site – the access - is located in flood zone 3, which indicates an extremely high risk of flooding. Consultation responses received as part of the preparation of the Neighbourhood Plan, indicated that houses along Foxglove Avenue have experienced flooding in the past due to the slope of the land. The flooding was caused by surface water runoff down the slope. Suffolk County Council as Lead Local Flood Authority still have concerns with the application and have a holding objection whilst awaiting further information. The Environment Agency is yet to respond to the application however, they did object to the previous application. Technical objections to the previous application indicated that the level of development would need to be reduced for an acceptable drainage solution to be found. The level of development proposed is still the same and therefore this concern does not appear to have been addressed. The application as proposed would not constitute sustainable development.

## **Section 10: Ecology**

- 10.1 The previous application was refused on the basis of insufficient ecological information. The revised application is supported by an ecological assessment. The site is not a designated site for conservation. Natural England has indicated it has no objections.

## **Section 11: Pollution – Air, Light and Noise**

11.1 The previous application was refused on the basis of insufficient information about air pollution and also light and noise pollution from the nearby Needham Market Football Ground. The application still does not address these points. In fact the planning statement completely dismisses concerns in respect of light and noise pollution.

## **Section 12: Minerals**

12.1 The previous application was refused on the basis of insufficient mineral information which was required as the site lies within a Minerals Protection Area. The revised application is supported by some site investigation reports. Suffolk County Council as Minerals Authority will determine whether this is satisfactory.

## **Section 13: Conclusion**

- 13.1 It is concluded that that there are still fundamental planning policy and technical issues with the application and that it is contrary to adopted and emerging development plan policies.
- 13.2 The revised proposal has failed to address a number of the previous reasons for refusal and therefore the revised proposed development still does not constitute sustainable development as required by the NPPF.
- 13.3 In addition, the supporting information that accompanies the application has erroneously overlooked the progress of the Needham Market Neighbourhood Plan which has been examined since the last application was determined and is awaiting referendum. The Neighbourhood Plan is a material consideration in the determination of the application by virtue of having been examined . Depending upon the timing of the determination of this application the Needham Market Neighbourhood Plan may be the most up to date part of the development plan and therefore the most important for determining the application.

Needham Market Town Council are advised to consider the following when formulating their formal response to the application.

1. Principle of development: The site lies outside of any defined settlement boundary and within open countryside where there is a policy presumption against residential development in both the Needham Market Neighbourhood Plan and the Adopted Mid Suffolk Core Strategy

2. As of November 2021, Mid Suffolk District Council is able to demonstrate a 9.57-year housing land supply which is in excess of the required 5-years. The development is therefore not required to meet any housing shortfalls.
3. The revised application has failed to address previous highway concerns and will have a significant adverse impact on the existing highway network.
4. The site is not the most sustainable location for new housing, has poor accessibility and pedestrian and vehicular connections to the town and is remote from local services and facilities. Future residents would inevitably have reliance on private vehicles and the application does not propose alternative sustainable transport modes.
5. The previous refusal on the grounds of Floodrisk in relation to the access on Barking Road has not been overcome and there is a clear objection to the principle of development in this location on the grounds of maintaining an adequate access.
6. There remains uncertainty around the proposed 'tertiary/emergency access' on to Quinton Road and the impacts of such an access in terms of highway safety and traffic congestion have not been addressed. It is also unclear whether vehicular access would be permitted given the bridleway status of The Causeway.
7. The application would result in landscape harm and erode the existing landscape buffer between Needham Market and Barking.
8. The revised application has not addressed issue of air pollution
9. The revised application has not addressed the issue of noise and light pollution from Needham Market Football Ground.
10. The site is not allocated for development in any emerging or adopted development plan document. Mid Suffolk has in excess of a 5-year land supply and therefore there is no overriding need for the development as housing requirements for the area have been met.
11. The application does not constitute a form of sustainable development and there is no overriding need for an exception to be made for it to be granted.

# Consultee Comments for Planning Application DC/21/06882

## Application Summary

Application Number: DC/21/06882

Address: Agricultural Land North Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Case Officer: Jasmine Whyard

## Consultee Details

Name: Mr Kevin Hunter

Address: Needham Market Community Centre, School Street, Needham Market Ipswich, Suffolk IP6 8BB

Email: Not Available

On Behalf Of: Needham Market Town Council

## Comments

The Town Council objects to the Planning Application.

A document has been uploaded and submitted, that forms the main part of the Town Council's submission to this application.

Further to that document the Town Council submits the following addition to Section 7 of the uploaded document:

Concerns over highway safety and access resulted in a reason for refusal of the two previous applications.

The 2020 application for 279 dwellings was refused on the basis of a single point of access which was considered to be inadequate to serve the number of dwellings and additionally that point of access was at risk of pluvial and fluvial flooding. The current application represents a slightly revised layout but with still with a single point of access and with that access still at risk of flooding. A second emergency or tertiary access is proposed to Quinton Road which joins up with a public bridleway at The Causeway. The bridle way status of the route would allow the public to use it on foot, horseback or by cycle but does not confer any vehicular access or use. Therefore it is unclear whether the proposed tertiary/emergency route is actually achievable.

Furthermore SCC Highways have indicated in their representations that a second permanent access is required to serve a development of this scale and because the primary access remains at risk of flooding. The proposal includes a secondary access but identifies it as an

emergency/tertiary access . No detailed information has been provided that would prove that this second access would be 1) permanently available 2) or that it would adequately meet highway safety standards. Therefore it is still unclear if it would be suitable to be used as the second access as requested by SCC Highways. Until it can be proven that the access is safe and available for permanent use then the issue of the primary access, subject to flooding is still unresolved and therefore the application should be refused again on that basis.

Therefore, the proposal potentially remains reliant on a single point of access that is within flood zone 3 and therefore has a high probability of flooding. The revised application fails to adequately address this reason for refusal.

The Town has held public consultation on this application which has attracted significant public objection. 74 local residents attended a public consultation meeting held on 7th February at Needham Market Community Centre. This demonstrates the high scale of public concern and objection.

Barking Parish Council wishes to object to Application No DC/21/06882 for Outline Planning Permission (access points to be considered, appearance, landscape, layout and scale to be reserved) Town and Country Planning Act 1990, erection of up to 279 No dwellings (including 100 affordable homes) re submission of DC/20/05046 - Land to the north west side of Barking Road Needham Market for the following reasons:

#### *Access to the site*

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

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

#### *Flood risk*

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

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

#### *Traffic*

Barking Parish Council's Speed Indicator device shows a consistent 35,000 vehicles travelling along the B1078 each week and the 279 houses will probably add a further 40,000 weekly vehicles at this point of the road. This will cause congestion and add to poor air quality. These extra vehicles will be joining the many accessing the A14 and A140 each day under the narrow bridge that floods, is closed at least each month due to incidents thus causing people to travel to Stowmarket or Claydon to join the A14. This railway bridge is the most frequently hit bridge in Britain and has to be closed each time until inspected and traffic allowed to use it again. It was hit 19 times in 12 months in 2021. The farthest point of the development is just over 1km from the nearest Co-op and involves walking along a narrow busy roadside that will be even busier if this development goes ahead. Most probably people will drive here – however there is only limited parking provision in Needham Market.



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

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

**Evidence – Consultee Environment Agency Air Quality Management – HOLDING OBJECTION**

comment “With 500 + vehicle movements per day screening and assessment is needed. The Institute of Air Management says the development has not demonstrated the impact is reasonable, and/or manageable. Also the applicant is expected to demonstrate that the increased vehicle movements will not significantly impact on air quality within Needham Market High Street and also demonstrate that the additional vehicle movements do not add to queues at width restricted bridge (which is the most hit bridge in England 19 times in 12 months in 2021) under the Norwich/London mainline resulting in long delays for queuing traffic and resultant impacts on air quality. **Holding objection** until such a time as applicant can demonstrate the impact of the development is acceptable and/or manageable.

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

*Listed Buildings*

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

*Visual Impact*

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

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

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

### *Biodiversity*

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

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

### *Agricultural Land*

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

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

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

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

There have been no material changes since this application or the original application and this third application for 279 houses will exacerbate any such problems. Overall, the problem is the sheer scale of the development which in turn leads to a very large impact on an already enlarged town with stretched facilities. It will negatively impact on the character of the surrounding area.

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

The emerging Needham Market Neighbourhood Plan does not allocate this site, neither does the Mid Suffolk emerging joint local plan which demonstrates that the authority has a 9.4 year land supply.

# Consultee Comments for Planning Application DC/21/06882

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Application Number: DC/21/06882

Address: Agricultural Land North Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Case Officer: Jasmine Whyard

## Consultee Details

Name: Miss Parish Clerk

Address: 69 Gardeners Road, Debenham, Stowmarket, Suffolk IP14 6RX

Email: Not Available

On Behalf Of: Offton And Willisham Parish Clerk

## Comments

Following the meeting of Offton & Willisham PC on Thursday 20th January the comment son this application are as follows:-

Offton and Willisham Object to the application.

It was agreed the objection should be supported by the below points:

1. We supported the comments of the preservation society. Regarding detrimental impact on the surrounding area.
2. The local council have reached their land supply so why would they consider further green field development.
3. No suitable access to highway and major trunk roads. i.e. A14 Infrastructure not sufficient. Health centre at capacity and middle school is closed



# Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 07929 786955 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site Reference: 183873/1/0137821

Local Planning Authority: Mid Suffolk District

Site: Agricultural Land North Of Barking Road  
Needham Market Suffolk

Proposal: Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of D)

Planning application: DC/21/06882

**Prepared by:** Pre-Development Team

**Date:** 7 January 2022

## ASSETS

### Section 1 - Assets Affected

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

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

## WASTEWATER SERVICES

### Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Needham Market Water Recycling Centre that will have available capacity for these flows

### Section 3 - Used Water Network

This response has been based on the following submitted documents: Flood Risk Assessment & Site Strategy dated November 2020. Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. The site strategy indicates that a pumped solution is required to drain the foul water flows from the development however, further information including the proposed peak pumped rate have not been detailed. We therefore request a condition requiring an on-site drainage strategy. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (3) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (4) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

### Section 4 - Surface Water Disposal

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

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

### Section 5 - Suggested Planning Conditions

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

#### Used Water Sewerage Network (Section 3)

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

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

### **Next steps**

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

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

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

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

### **Foul water:**

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

Our Ref: 21\_05848\_P  
Your Ref: DC/21/06882

04/01/2022

Dear Sir/Madam

**RE: Application for outline planning permission (access points to be considered, appearance, landscape, layout and scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046) at Agricultural Land North Of Barking Road Needham Market Suffolk**

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

As outlined in our initial correspondence for application DC/20/05046, I note that the applicant still intends to discharge surface water to a watercourse within the watershed catchment of the Board's IDD. We request that this discharge is facilitated in line with [the Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 167 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Kind Regards,

Ellen

Ellen Moore  
Sustainable Development Officer  
Water Management Alliance

Jane Marson (Chairman) Michael Paul (Vice-Chairman)

Phil Camamile (Chief Executive)

Constituted by The East Suffolk Internal Drainage Board Order 2008  
Statutory Instrument 2008 No 750





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

**Our ref:** AE/2021/126752/01-L01  
**Your ref:** DC/21/06882  
**Date:** 14 February 2022

Dear Sir/Madam

**APPLICATION FOR OUTLINE PLANNING PERMISSION (ACCESS POINTS TO BE CONSIDERED, APPEARANCE, LANDSCAPE, LAYOUT AND SCALE TO BE RESERVED) TOWN AND COUNTRY PLANNING ACT 1990 - ERECTION OF UP TO 279NO DWELLINGS (INCLUDING 100 AFFORDABLE) (RE-SUBMISSION OF DC/20/05046).**

**AGRICULTURAL LAND NORTH OF BARKING ROAD, NEEDHAM MARKET, SUFFOLK**

Thank you for your consultation. We have reviewed the application as submitted and are raising a holding objection on flood risk grounds. If you would like to seek further advice on the emergency planning implications of this proposal please pass the application to the Suffolk Resilience Forum Partnership Manager, who will ensure that it is discussed at the next Suffolk Resilience Forum (SRF) meeting. Please see the "Guidance for Local Planning Authority" section of the [SRF website](#) for more detail on the agreed process between the Environment Agency and SRF. This process covers planning applications that are subject to the Exception test.

### **Flood Risk**

Whilst the majority of the site sits within Flood Zone 1, our maps show the South of the site is located in fluvial Flood Zones 2 & 3, medium & high probability zone. The proposal is for Outline Planning Permission for the erection of up to 279No dwellings (re-submission of DC/20/05046), which is classified as a 'more vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification](#) of the Planning Practice Guidance (PPG). Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site specific Flood Risk Assessment (FRA).

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

The submitted flood risk assessment (FRA), undertaken by JMS, referenced EX 1807704 and dated November 2021, does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference ID: 7-030-

Environment Agency  
Iceni House Cobham Road, Ipswich, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..



20140306. This FRA does not, therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development and we are raising a holding objection. In particular, the submitted FRA fails to:

- Identify the impacts of fluvial flood risk from the Ordinary watercourse which joins the main river Lion Barn Drain and determine floodplain extents up to the 0.1% (1 in 1000) annual probability flood event including allowance for climate change.
- Assess the impact of climate change using appropriate climate change allowances. Please note that the new Peak River Flow Climate Change Allowances were published on the gov.uk website on 20<sup>th</sup> July. The guidance on accessing and using the data can be viewed here:-  
<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

It may be appropriate to consider the peak rainfall allowance if the catchment is <5km.sq

- The site/access route would be flooded by unknown depths in the 1% (1 in 100) annual probability event with climate change flood event so the flood hazard on the access route is currently unknown. The FRA does not include details of a Flood Response Plan to adequately mitigate this. Consequently, there would be an unacceptable risk to the health and safety of the occupants in a flood event.

### **Overcoming our Objection**

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

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

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

Further advice can be found in the technical appendix at the end of this letter.

### **Foul Drainage**

The application form does not state the method of foulwater disposal. However the location of the site puts it at the edge of the sewerage catchment of Needham Market WRC. Our records (2020) indicate this WRC is at 60.8% capacity, and has treatment capacity for the flows from this development.

The developer needs to be made aware of the importance of early consultation with Anglian Water with regards to foul drainage from the site. They need to confirm the foulwater disposal method and check that there is still sufficient treatment capacity at the Needham Market WRC. This is to prevent any detrimental impacts on the receiving water environment.

We trust this advice is useful.

Yours faithfully

**Mr Liam Robson**  
**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8923

Direct e-mail [Liam.Robson@environment-agency.gov.uk](mailto:Liam.Robson@environment-agency.gov.uk)

## **Flood Risk Technical Appendix**

### **Access/Egress**

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

Section 5.3 of the FRA states that:-

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

However, no further detail has been provided of how safe access will be achieved, for example the flood hazard ( depth/velocity ) or the height of the road above flood depths nor mitigation for any potential loss of flood storage or flow routing under the road to prevent displaced flows.

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

### **Reason for Refusal**

We note that previous plans here have been refused for the following reason:

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

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

### **Informative – Needham Market flood risk management project**

You should also be aware that the Needham Market flood risk management project is investigating ways of reducing the risk from fluvial and surface water flooding in the town. This project will not benefit the development site in question, but highlights the importance of ensuring that this development proposal does not increase flood risk to the town and ideally reduces the risk of flooding.

## **Modelling Guidance**

The extent on the drawing in the FRA and Site Layout - masterplan P3-14/09/21 is not based upon any depths nor compared to topography. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk. There is an opportunity to sequentially site the development by moving it back away from the watercourse.

### **JFLOW**

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

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

In order to have fully considered all forms of flooding and their influence on the site, it will be necessary to identify the fluvial flood risk. Fluvial flood levels will be required for the main river to the South of the site. It may be appropriate to undertake some flow analysis such as FEH and 1D modelling to establish the level. Any revised FRA will need to consider this source of flooding and demonstrate appropriate mitigation against fluvial flood risk. If the upstream catchment is less than 5km in length the applicant should consider the peak rainfall rather than peak fluvial river flows.

### **Modelling**

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

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

Please refer to the attached documents:

- OI 379\_05 Computational modelling to assess flood and coastal risk
- Flood Estimation Guidelines
- 'Using Computer River Modelling as Part of a Flood Risk Assessment - Best Practice Guidance' for further advice regarding modelling submissions.

We acknowledge that some of the documents above refer to outdated planning policy. However, the technical guidance and our requirements regarding computer modelling remain relevant.

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

Paragraph 163 of the NPPF states:-

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

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

### **Guidance for Local Council on Safety of Inhabitants – Emergency Flood Plan**

The Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The [Planning Practice Guidance](#) to the National Planning Policy Framework states that those proposing developments should take advice from the emergency services when producing an evacuation plan for the development as part of the flood risk assessment.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your Emergency Planners and the Emergency Services to determine whether the proposals align with the guiding principles of the Planning Practice Guidance (PPG).

If you would like to seek further advice on the emergency planning implications of this proposal please pass the application to the Suffolk Resilience Forum Partnership Manager, who will ensure that it is discussed at the next Suffolk Resilience Forum (SRF) meeting. Please see the “Guidance for Local Planning Authority” section of the

[SRF website](#) for more detail on the agreed process between the Environment Agency and SRF. This process covers planning applications that are subject to the Exception test.

## **Other Sources of Flooding**

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

## **Surface Water Attenuation Pond**

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

## **Informative - Ordinary Watercourse Consent**

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

## **Flood Risk Climate Change Guidance: Detailed Allowance**

### Peak river flow allowances

Peak river flow allowances show the anticipated changes to peak flow by management catchment. Management catchments are sub-catchments of river basin districts.

The range of allowances is based on percentiles. A percentile describes the proportion of possible scenarios that fall below an allowance level. The 50th percentile is the point at which half of the possible scenarios for peak flow fall below it, and half fall above it.

The:

- central allowance is based on the 50th percentile
- higher central allowance is based on the 70th percentile
- upper end allowance is based on the 95th percentile

An allowance based on the 50th percentile is exceeded by 50% of the projections in the range. At the 70th percentile it is exceeded by 30%. At the 95th percentile it is exceeded by 5%.

### Select the peak river flow allowances to use for your assessment

For flood risk assessments and strategic flood risk assessments, the Environment Agency, as a statutory consultee, uses the management catchment climate change allowances from the [peak river flow map](#) as benchmarks.

To work out which management catchment allowances to use, you need to:

- access the climate change allowances for [peak river flow map](#)
- search for your location by postcode, national grid reference or town in the 'find address or place' search box
- select the management catchment for your location – the allowances appear in a pop-up box

In some locations the dominant source of flooding will be from a neighbouring management catchment. If so, use the allowances from the neighbouring management catchment to assess the risk for your development or site allocation. [Contact the Environment Agency](#) if you are unsure which allowance to use.

The Environment Agency also provide these allowances in the [peak river flow climate change allowances by management catchment](#) table – you have to know your management catchment to get the information you need.

You also need to know the flood zone your development is located in.

In flood zones 2 or 3a for:

- essential infrastructure – use the higher central allowance
- highly vulnerable – use central allowance (development should not be permitted in flood zone 3a)
- more vulnerable – use the central allowance
- less vulnerable – use the central allowance
- water compatible – use the central allowance

In flood zone 3b for:

- essential infrastructure – use the higher central allowance
- highly vulnerable – development should not be permitted
- more vulnerable – development should not be permitted
- less vulnerable – development should not be permitted
- water compatible – use the central allowance
- Use the **central allowance** for most assessments and to use the **higher central** for essential infrastructure and the **upper end** for credible maximum scenarios (this is a change to how we currently apply the peak river flow allowances for FRAs/spatial planning proposals)

enhancing... improving... cleaning... restoring...  
changing... tackling... protecting... reducing...  
create a better place... influencing... inspiring...  
advising... managing... adapting...

## **Using computer river modelling as part of a flood risk assessment**

Best Practice Guidance - Version 1 April 2006



We are The Environment Agency. It's our job to look after your environment and make it **a better place** - for you, and for future generations.

Your environment is the air you breathe, the water you drink and the ground you walk on. Working with business, Government and society as a whole, we are making your environment cleaner and healthier.

The Environment Agency. Out there, making your environment a better place.

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# Notes:

This document concentrates on computer river modelling. However, many of the principles apply equally to coastal modelling.

The principles also apply to Flood Consequence Assessments carried out in Wales.

Whilst allowances should be made for Climate Change, these have not been quantified in this Guidance. These should be assessed at the time of modelling using the latest Environment Agency standards.

For all contact with the Environment Agency you should ensure that you are speaking to the office that covers the area of land in question. For further details of Environment Agency office locations please refer to our website [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

You should read our Standard Notice which details our terms and conditions. If this has not been supplied to you, you can get by calling us on 08708 506 506 or from our [website](#) (search for 'types of licence').

If you have any queries about the content of this document or suggestions for improvement please e mail [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

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## **1. INTRODUCTION**

### **1.1 Purpose of this Document**

This document is guidance for carrying out a flood risk assessment where computer river modelling is necessary. Flood risk assessments are carried out by individuals, developers, consultants or Local Planning Authorities for a variety of reasons (e.g. for development purposes).

The Environment Agency's Policy is to take a risk-based approach to managing flood risk using an approach consistent with that commonly applied to other hazards. This means that flood risk management decisions are informed by flood risk assessment. It is recommended that others take the same approach.

The purpose of this document is to give general best practice guidance on the standards that should be used when carrying out computer modelling of watercourses in order to complete a flood risk assessment. Further details about undertaking Flood Risk / Consequence Assessments for the construction industry are given elsewhere, in particular in CIRIA Report C624<sup>1</sup>.

Further information may be required for land use development purposes as detailed in PPG25 (also having regard to draft PPS25) or TAN15.

It is only intended to give an overview of best practice to be considered when carrying out modelling in order to increase awareness and understanding. Further more detailed guidance for modelling for specific purposes is contained elsewhere. When starting / procuring modelling works you should always ensure you have used the appropriate detailed specification.

### **1.2 Modelling and Flood Risk Assessment**

It should be recognised that it is not always necessary to produce a hydraulic model for all flood risk assessments. A decision on whether to construct a model should be made based on the scale and nature of the potential flood risk, as well as the scale of the project and the existing information available on flood risk. In many less complex assessments simple hydrological and hydraulic analysis may be all that is required. CIRIA Report C624 recommends a staged approach to Flood Risk Assessment. Following such a staged approach allows the need for a model, and the extent of such a model, to be determined. If there is any doubt whether a model is required, this should be discussed with local Environment Agency Staff (Development Control Teams for Land Use Planning, Flood Risk Mapping & Data Management Teams for other) at the earliest opportunity. Suitable information to assist with the modelling may also be available so early dialogue is recommended.

However, even if a model is not constructed, an assessment of the impact of any proposed development on runoff should be carried out using Flood Estimation Handbook<sup>2</sup> (FEH) techniques in almost all cases. DEFRA/Environment Agency R&D Technical Report W5-074/A "Preliminary Rainfall Run-off Management for Developments"<sup>3</sup> provides further information on runoff assessment for developments.

### **1.3 Appropriate Modelling Staff Involved**

Suitably qualified and experienced personnel should be used to carry out the work described in this document.

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<sup>1</sup> Lancaster, J., Preene, M. and Marshall, C. 2004, CIRIA Report C624, Development and Flood Risk – Guidance for the Construction Industry, CIRIA, London.

<sup>2</sup> Centre for Ecology and Hydrology, 1999. Flood Estimation Handbook. Wallingford, CEH. Further details are available at <http://www.nwl.ac.uk/feh/> or from CEH on 01491 838800

<sup>3</sup> HR Wallingford (2004) Preliminary rainfall runoff management for developments: Users Guide. Defra / EA R&D Technical Report W5-074/A, HR Wallingford, Wallingford.

## 1.4 Requirements at Specific Locations

Requirements at specific locations should always be discussed with local Environment Agency staff to ensure that any site-specific factors are identified, which may require special treatment when carrying out the modelling.

## 2.0 OBJECTIVES OF THE MODEL STUDY

The objectives and the required outputs of the modelling exercise should be defined at the outset. These should be reviewed at regular intervals and at completion.

At an early stage, the design condition should be clarified. This may, for example, include a freeboard and an allowance for climate change. Further information on freeboard is in R&D W187<sup>4</sup>.

## 3.0 MODEL BUILDING

A one-off request for information held by the Environment Agency at the very beginning of the project is recommended since this affects selection of method etc, and could prevent further information coming to light at a later stage and complicating matters.

### 3.1 Choice of Model

The modelling software chosen should be capable of producing the required output. It will generally be appropriate to choose commercial hydraulic/river modelling software that is in widespread use. In certain circumstances, for example where the applicability of a model to a specific situation has not been previously demonstrated, it may be necessary for those conducting the flood risk assessment (FRA) to have independent benchmarking tests carried out to demonstrate model performance using standard data. Examples of how this may be achieved under a range of scenarios are provided in the Defra/Environment Agency R&D Report 'Benchmarking of hydraulic river modelling software packages' (W5-105) which is available via the Joint Defra/Environment Agency Flood and Coastal Erosion Risk Management R&D Programme [website](#).<sup>5</sup>

In reporting on any hydraulic modelling carried out as part of the FRA, a technical description of the model should be provided, including the name and version of the software used, referring to published papers/reports where appropriate to provide technical detail and to demonstrate the applicability of the model(s) to the situation in question. These references may need to be provided to the Environment Agency if required. If no publications are available then a more detailed technical description should be provided within the FRA, along with examples of relevant previous applications and/or the results produced by applying the model to standard tests (as outlined above, or similar).

Also, at this stage, the choice should be made between a fully hydrodynamic 1D or 2D model or a steady-state backwater model, flood routing model or combination of methods.

A full hydrodynamic model must be used if the study area contains either structures whose operation varies with time (e.g. pumps, sluices, and tidal outfalls) or a tidal estuary where tidal water levels increase going up the estuary<sup>6</sup>. This should also be employed in complex tidal/fluvial situations and where the watercourse is subject to rapid increases and decreases in flow. If there is significant floodplain storage and complex flow routes on the floodplain then 2D modelling of the floodplain may be more representative. In other cases, either a steady-state or hydrodynamic model may be chosen. It should be noted that a steady-state model is unlikely to give a reasonable estimation of water levels where storage is present.

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<sup>4</sup> Environment Agency: Fluvial Freeboard Guidance Note. Technical Report W.187.2000.

<sup>5</sup> Flood & Coastal Defence R&D Programme, Benchmarking Hydraulic River Modelling Software Packages, R&D Study: W5-105/TR1, Defra / EA, March 2004.

<sup>6</sup> This is typically the case in estuaries of significant rivers and can be seen by inspection of the tide tables.

### 3.2 Survey Data

The model should be based on a topographic survey of the watercourse. The upstream and downstream limits should be defined by the objectives of the flood risk assessment, rather than to the limits of the project / study area (see Section 3.7). The lateral extent of the survey should be sufficient to include the full extent of flooding. Guidance on this extent may come from flooding records and from the Flood Map. The extent of the survey work should be defined jointly by those undertaking the river modelling and those undertaking the survey in conjunction with advice from Environment Agency Flood Risk Mapping & Data Management staff.

The survey (and the model on which the survey is based) should continue far enough downstream so that uncertainty in the boundary condition does not significantly influence the estimated flood levels.

The cross sections surveyed should be representative of the channel and floodplain and the spacing between cross sections and orientation should be determined from the appropriate software documentation and textbooks<sup>7</sup>. Consideration shall be given to the additional survey information that may be required between cross-sections in areas where detailed flood depths or extents are needed. This can be achieved by either adding further cross sections or surveying additional spot levels.

During the survey, information on structures, flood routes, potential blockages / obstructions to the channel and channel roughness should also be gathered.

Survey data should be obtained using dual frequency GPS equipment, however, some minor and low risk developments do not justify the cost and time required to produce this type of survey. In these cases it **may** be acceptable to base the survey on OSBMs and this is at the discretion of the Agency's Development Control Officer based on the appropriateness 'test' in PPG25.

All levels must be based on Ordnance Survey Datum (further guidance on survey standards should be obtained by reference to the Environment Agency [National Survey Specification](#)). All cross sections and other survey information shall be located in plan relative to the National Grid. It is considered best practice that an insured and Chartered Land Surveyor complete the Survey.

### 3.3 Hydrometric Data

The Environment Agency may hold existing hydrographic and floodplain survey data which may be of use in a flood risk assessment. Environment Agency staff may be able to provide further information on the appropriateness of survey.

River flow, river level and rainfall data relevant to the model should be collected where these exist. The prime source of this data will be the Environment Agency. An understanding of the uncertainty and confidence within this data should be developed.

Another source of hydrological data is data contained within the [Flood Estimation Handbook](#). The [UK HiFLOWS Project](#) also provides up to date information.

### 3.4 Historic Information

Information on historic flooding (e.g. newspaper articles, photos, flood marks) should be collected and utilised to guide the survey extent and to aid the modelling process. Such data is particularly valuable as it can provide information on historic flooding prior to the periods covered by hydrometric data. A search of the Internet can often provide useful information<sup>8</sup>. However, the effect of any alterations and additions to the watercourse and associated structures since the date

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<sup>7</sup> For example, the online manuals supplied with modelling software

<sup>8</sup> The Chronology of British Hydrological Events, <http://www.dundee.ac.uk/geography/cbhe>, may contain some useful information

of the recorded event needs to be considered. Historic information is likely to be held by the Environment Agency Area office.

### **3.5 Previous Modelling**

The Environment Agency may hold existing river models that may be of use in a flood risk assessment. Such models may, for example, have been produced during previous flood risk mapping studies, the design of flood alleviation schemes and/or previous flood risk assessments in the area.

Where existing models are available, consideration should be given as to whether these could be used as part of the flood risk assessment. You should be aware that there may be cost, licensing and intellectual property rights (IPR) issues associated with the use of models which will need to be resolved before any previous modelling is used.

If models or survey data are provided by the Environment Agency or third parties it is recommended that check surveys are undertaken at key locations to ensure that the data provided is compatible with current conditions.

The Environment Agency may not own the Intellectual Property Rights to hydraulic models that it holds. We therefore may not be able to release information with a licence for its use.

Ownership of the IPR or an approved IPR licence will be required by the Environment Agency if it is planned to use the modified model to update the Environment Agency's flood risk mapping products and risk assessment products to represent the as built situation.

### **3.6 Hydrological Assessment**

A hydrological assessment of the flood flows should be made using the methodology described in the Flood Estimation Handbook and the Environment Agency's Guidelines on use of the Flood Estimation Handbook<sup>9</sup>.

The hydrological assessment should use, wherever available, local data to improve the estimation of flood flows.

If a hydrodynamic model is used for the modelling, the hydrological assessment should include consideration of peak flows, flood volumes and shape of the flood hydrograph. If the problem includes storage (e.g. reservoir storage or a tide-locked watercourse) it is essential that the critical duration storm for storage (which often differs from the critical duration for peak flow) is identified. If a steady-state model is used, this may be limited to just consideration of peak flows.

Hydrological inputs should be estimated for a range of return periods up to and including the design flow (typically the flow with an annual probability of exceedence of 1%), and should include an appropriate allowance for climate change.

### **3.7 Model Building**

It may be appropriate to speak to Area Environment Agency staff prior to commencing any model building.

#### **(a) General**

The model should be built to represent the key flood flow routes, flood storage and structures in the study area. The defined study area should be sufficient to demonstrate the effects of any development on locations away from the site of the proposed development.

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<sup>9</sup> Environment Agency, 2000. *Flood Estimation Handbook Guidelines (Parts 1 and 2)* Bristol, Environment Agency

## **(b) Upstream Boundaries (Inflows)**

The upstream boundary or boundaries should be developed under the hydrological assessment described in Section 3.6. For some models, one single upstream inflow per flood event may be sufficient, whilst for others, many upstream boundaries may be needed if a number of tributaries or other inflows are present. The choice of location of the upstream boundaries should be based on hydraulic considerations, not on the upstream limit of the development. The upstream boundary should be far enough upstream to allow the full impact of the development on upstream water levels to be identified.

## **(c) Downstream Boundary (Levels)**

The downstream boundary should be at a location where the relationship between level and flow is well defined, e.g. a weir. Where this is not possible, it should be sufficiently downstream of the area of interest so that any errors in the boundary will not significantly affect predicted water levels at the proposed development site. For a typical fluvial river, a rule of thumb is that a backwater effect extends a length  $L=0.7D/s$ , where  $D$  = bankfull depth and  $s$  = river slope. Hence if the downstream boundary is greater than  $L$  from the site it is likely that any errors in the rating curve at the boundary will not affect flood levels at the site. If the downstream boundary is tidal, it should be a location where a tidal curve can be accurately defined. Any tidal boundary should take into account both the astronomical tide (i.e. the tide caused by the gravitational effects of the Moon and the Sun and reported in published tide tables) and storm surges (i.e. the elevation of tidal levels caused by weather conditions). Careful consideration of combined probabilities<sup>10</sup> may be required in such cases. The Environment Agency holds extensive extreme tide information from Flood Risk Mapping Studies.

## **(d) Hydraulic Coefficients**

The coefficients used in the model (e.g. channel roughness, weir coefficients) should be determined with guidance from standard textbooks. These texts should be referenced in the modelling report. Work is ongoing to produce guidance relevant to the UK, but in the meantime standard works such as Chow<sup>11</sup> and Hicks & Mason<sup>12</sup> can provide some guidance. Further information on roughness can also be obtained from the Defra / Environment Agency Conveyance Estimation System (CES) – <http://www.river-conveyance.net/>.

## **4. MODEL CALIBRATION, VERIFICATION AND SENSITIVITY TESTING**

### **4.1 Calibration**

Wherever practicable, the hydrological assessment and the hydraulic model should be calibrated against recorded flows and/or water levels from observed flood events. If calibration data is available, the model should be calibrated using at least three separate events. If no calibration data is available, a 'reality check' on the predicted levels and flows can often be carried out from photographs, historic information and anecdotal accounts of flooding.

The coefficients used in the calibration process should only be varied within the possible ranges suggested in the standard textbooks. The calibration of steady-state models should consider flow and flood levels. Calibration of hydrodynamic models should also consider the timing of the flood peak, flood volume and shape of the flood hydrograph.

### **4.2 Verification**

If calibration is carried out, at least one separate observed event should be run through the model after the calibration to verify the adjustment of parameters.

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<sup>10</sup> Defra / EA R&D Programme. Joint probabilities - dependence mapping & best practice, FD 2308/TR1. HR Wallingford. 2003.

<sup>11</sup> Ven Te Chow, *Open Channel Hydraulics*, McGraw-Hill 1959.

<sup>12</sup> D.M.Hicks & P.D.Mason. *Roughness Characteristics of New Zealand Rivers*. 1999.



### 4.3 Sensitivity Testing

The model should be tested by adjusting the key parameters within it. These parameters should include at least model inflows, downstream boundary condition, channel roughness and key structure coefficients. The range of parameters used in sensitivity tests should reflect uncertainties, possible changes due to climate change and variations in hydraulic coefficients (e.g. from seasonal changes or periodic maintenance).

Sensitivity to blockage of critical structures should also be tested. R&D W5A-061<sup>13</sup> includes current understanding & some interim guidance.

## 5. REPORTING

### 5.1 General

A report should be written describing the modelling. The objective of this report is to enable an evaluation of the model and results to be carried out if necessary. It also should be a self-contained report that will provide sufficient information to allow future use of the model by the Environment Agency including if necessary replicating the work undertaken. The detail of the report should be appropriate to the complexity of the modelling.

### 5.2 Items to be Included

The key items to be included in the report are:

#### **Statement of Objectives**

The report should provide an explanation of the reasons the modelling exercise has been undertaken and the planned objectives of the exercise. It should indicate any deviations from the original objectives or planned project outputs, and outline the reasons why these occurred.

#### **Method statement and Justification**

The report should include a clear method statement, which makes it clear how the modelling has been carried out to fulfil the objectives.

A justification of the methodology should also explain why the model has been used for this application, giving detailed reasons why the modelling tool is applicable/appropriate to the situation (e.g. fully dynamic or steady-state backwater model). It should indicate any perceived advantages or disadvantages of applying the chosen tool.

#### **Technical description**

Only a brief technical description is required if the tool is well known to the Environment Agency / widely applied (seek advice from Environment Agency staff). If the model is less widely known or applied, then a more detailed development history is required, giving examples of previous applications. The version number of the model used should be reported, and how the model outputs compare with those of other packages when applied to standard tests (see 3.1 above).

The schematic showing how individual parts of the model are connected should be provided.

#### **Data sources**

All data used in the model must be listed in reports and made available for inspection.

Methods of data capture and/or sources of data must be made clear in the report, as should the processes by which the raw data were converted.

Any reference to earlier work should be clearly referenced, and applications or development of existing models should be subject to the same rigorous inspection methods.

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<sup>13</sup> Scoping study into the hydraulic performance of bridges and other structures, including effects of blockage, at high flow. *EA/Defra R&D Programme*. July 2004.

The ownership of the data collected and the format of the data should be stated.

Uncertainty in data sources should be referenced especially where data have been discounted due to low confidence.

### **Parameters**

The derivation of the parameters (e.g. channel roughness) used within both the hydrological assessment and the hydraulic model should be stated.

### **Calibration/Verification**

Where calibration has been undertaken, the method used must be clearly illustrated and the number of independent data sets used for verification must be displayed. The model results must be presented against observed values for key locations for each verification data set, and descriptive statistics applied to describe the error band in the model.

### **Sensitivity Analysis**

The results of the sensitivity testing should be described and the potential effect these could have on the model output should be discussed.

### **Audit Trail**

The audit trail developed should be described in unambiguous detail.

### **Limitations**

Any limitations of the model or modelling technique should be highlighted. The impact of such limitations on the present or future use should be clearly stated.

### **Conclusions**

The report shall include concluding remarks, which highlight key issues from other sections and draw attention to the critical locations and/or structures within the model.

Where in the above section (5.2), the model is referred to this should be taken to include the hydrological assessment. The hydrological assessment must be reported to the same level of detail as the hydraulic modelling. The same key items will apply to both modelling and hydrology.

## **5.3 Format of Reporting**

The report should be in a format that is easy to copy and transmit electronically, and must include all plans and schematics. Adobe pdf files are therefore preferred.

## **5.4 Other Deliverables**

Copies of the model data files should be supplied together with sufficient instructions to allow these models to be run and viewed, for example, a text file containing timestep, runtime etc. A data file containing initial conditions should also be provided.

## **5.5 Future Use**

A statement should accompany the report and model data on the allowable future uses of the model and its associated documentation.

Ownership of the Intellectual Property Rights (IPR) or an approved IPR licence will be required by the Environment Agency if it is planned to use the modified model to update the flood risk mapping products and risk assessment products to represent the as built situation.

## **6. QUALITY ASSURANCE AND AUDIT TRAIL**

Throughout the study, a well-defined audit trail should be defined and reported. This should include all relevant documentation and should link with the appropriate quality assurance procedures of the organisation carrying out the study. Provision should be made to make the relevant documentation available to others who may use the model in future.

# Glossary of terms

**Backwater Curve** - The longitudinal profile of the water surface (in a non-uniform flow in an open channel) when the water surface is not parallel to the river bed. This is caused by a restriction such as a dam or weir, increasing the depth of the water above the normal water level that would result if the restriction were removed.

**Backwater Effect** - The effect where a dam or other restriction raises the surface of the water upstream from it above the normal water level.

**Backwater Flooding** - Flooding caused by downstream conditions such as a channel restriction and/or high flow in a stream at a confluence downstream of the flooding.

**Backwater Model** – A model built to represent the backwater effect.

**Calibration** – The process of adjusting parameter values in a model to try and match recorded data, so that the model can be taken as a good representation of reality.

**Combined Probability** – The chance of two or more independent events occurring concurrently.

**Critical Duration Storm** – The duration of storm necessary to produce the maximum instantaneous peak flow or volume at a specific location in a drainage system, for any given flood event probability.

**Floodplain** – Land adjacent to a watercourse over which water may flow in time of flood. This generally includes the defended floodplain, an area over which water would flow if flood defences were not present, or if flood defences fail.

**Flood Routing Model** – Process of determining progressively the timing, shape, and amplitude of the flow in a flood wave as it moves downstream at successive points along the river.

**Hydrological Model** – A mathematical model used to estimate the flow in a river that will result from rainfall. It will usually be based on such things as catchment size, geology and soil type, steepness, land use and storage within the catchment. The model will be calibrated and verified using recorded rainfall and flows, before using design rainfall to estimate the flows which might be expected in floods of different probabilities.

**Hydraulic Model** – A mathematical model used to predict possible future levels (and flows in a hydrodynamic model) taking into account the topography, shape and roughness of the river bed and floodplain, obstructions (e.g. weirs and bridges), and the inflows provided by the hydrological model etc. Models are calibrated using recorded historic flood data, where it is available.

**Hydrograph** – A graph showing the water level (stage), discharge, or other property of the flows in a river, with respect to time.

**Hydrological Assessment** – Carried out to understand the cycle of precipitation, consequent runoff, infiltration, and storage; eventual evaporation etc.

**Intellectual Property Rights** – The legal ownership of the content of the work in question.

**Storage** – Location where water is retained due to the lie of the land, man made influence or effect of tides / other river flows.

**Steady-State Model** – A hydraulic model in which the flow at any point in the model is constant with time (there can be many different flows but all are constant over time). This type of model cannot estimate the effects of storage on flood levels or downstream flows. Hydrodynamic models estimate flows and levels throughout a flood event, and can therefore take into account the effects of storage on flows and flood levels.

Topographic Survey – Survey to measure and record the physical features of an area in horizontal and vertical dimensions.

Tributary – A river or stream that flows into a larger river.

Upstream / Downstream Boundary – The limits of the model or assessment upstream and downstream of the site of interest.

Verification – The process of checking the accuracy of the outputs of the calibrated model in comparison with recorded data. If sufficient data is available it is good practice to calibrate the model using some recorded data, and verify the model using data from other flood events.

## List of abbreviations

PPG25 – Policy Planning Guidance Note 25

TAN15 – Technical Advice Note 15

CIRIA – The Construction Industry Research and Information Association

DEFRA – Department for Environment, Farming and Rural Affairs

R&D – Research and Development

1D – One Dimensional

2D – Two Dimensional

FRA – Flood Risk Assessment

## References

Lancaster, J., Preene, M. and Marshall, C. 2004, CIRIA Report C624, Development and Flood Risk – Guidance for the Construction Industry, CIRIA, London.

Centre for Ecology and Hydrology, 1999. Flood Estimation Handbook. Wallingford, CEH. Further details are available at <http://www.nwl.ac.uk/feh/> or from CEH on 01491 838800.

HR Wallingford (2004) Preliminary rainfall runoff management for developments: Users Guide. Defra / EA R&D Technical Report W5-074/A, HR Wallingford, Wallingford.

Environment Agency: Fluvial Freeboard Guidance Note. Technical Report W.187.2000.

Defra / EA, March 2004. Flood & Coastal Defence R&D Programme, Benchmarking Hydraulic River Modelling Software Packages, R&D Study: W5-105/TR1.

Environment Agency, 2000. Flood Estimation Handbook Guidelines (Parts 1 and 2) Bristol, Environment Agency.

Defra / EA R&D Programme. Joint probabilities - dependence mapping & best practice, FD 2308/TR1. HR Wallingford. 2003.

Ven Te Chow, Open Channel Hydraulics, McGraw-Hill 1959.

D.M.Hicks & P.D.Mason. Roughness Characteristics of New Zealand Rivers. 1999.

EA/Defra R&D Programme. July 2004. Scoping study into the hydraulic performance of bridges and other structures, including effects of blockage, at high flow.

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22 December 2021

Dear Ms Whyard

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

**AGRICULTURAL LAND NORTH OF BARKING ROAD, NEEDHAM MARKET,  
SUFFOLK  
Application No. DC/21/06882**

Thank you for your letter of 21 December 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

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

Yours sincerely

**Tom Goodman**  
Business Officer  
E-mail: [thomas.goodman@historicengland.org.uk](mailto:thomas.goodman@historicengland.org.uk)



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Date: 13 January 2022  
Our ref: 379187  
Your ref: DC/21/06882



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Dear Ms Whyard

**Planning consultation:** Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279 No dwellings (including 100 affordable) (re-submission of DC/20/05046).

**Location:** Agricultural Land North Of, Barking Road, Needham Market, Suffolk

Thank you for your consultation on the above dated 21 December 2021 which was received by Natural England on the same date.

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

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

#### **NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED**

We consider that without appropriate mitigation the application would:

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

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

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

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

## **NATURAL ENGLAND'S DETAILED ADVICE**

### **1) Further advice on mitigation**

#### **Suitable Alternative Natural Green Space (SANGS)**

As highlighted in our previous letter for application DC/20/05046 (02 December 2020) and in the submitted Ecological Impact Assessment (Parker Planning Services, December 2018), there is concern for the impacts of increased recreational pressure on Barking Woods SSSI, in particular the impacts of trampling, nutrient deposition and the disturbance of birds utilising the site. These birds are sensitive to disturbance from recreational walkers, cyclists etc. and in particular dogs off leads.

Natural England recommends that large developments include the provision of well-designed open space/green infrastructure that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary.

The applicant may wish to consider the benchmark standards for accessible natural greenspace, the TCPA have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% GI as a target quantum. The [Guidelines for Creation of Suitable Alternative Natural Greenspace \(SANG\) - August 2021](#) 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. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi natural areas with a range of native species
- Circular dog walking routes of 2.7 km<sup>1</sup> 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

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

Natural England notes the current provision of public open space as shown in the Indicative Masterplan (uploaded 21 December 2021). We are currently satisfied that this will mitigate recreational disturbance from the development with respect to Barking Woods SSSI. However, should this plan change significantly at future stages of application, our position may change.

#### **Management funding for nearby sites**

Natural England notes that the submitted Ecological Impact Assessment (Parker Planning Services, December 2018) suggests that provision of management funding for nearby local sites could further reduce impacts on nearby local sites, including Barking Woods SSSI. We would advise that you may wish to consult the Woodland Trust and the Suffolk Wildlife Trust, who manage parts of the

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<sup>1</sup> 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*



woodland, on the feasibility of this.

Another way to further reduce impacts could be through hedgerow planting to encourage wildlife corridors for species such as dormice

## **2) Other advice**

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

### **Net Gain**

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 174, point d and Para 180, point d of the National Planning Policy Framework which states that:

Para 174. *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

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

Para 180. *“When determining planning applications, local planning authorities should apply the following principles:*

*d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate”.*

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

### **Ancient woodland, ancient and veteran trees**

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Priority habitats**

Natural England notes that part of the site is currently classified as Deciduous Woodland, a priority habitat as listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. The National Planning Policy Framework (paragraph 118) states that ‘when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.’ Natural England notes and welcomes the inclusion of the proposal to retain this habitat.

### **Sustainable Drainage Systems (SuDS)**

We support the inclusion of sustainable drainage systems (SuDS) to manage surface water disposal, these systems can be used to create wetland habitats for wildlife in an attractive aquatic setting. We advise that this is considered and incorporated into the design, the [CIRIA guidance \(susdrain.org\)](#) provides useful information about integrating SuDS and biodiversity. The

maintenance of SuDS should be provided for the lifetime of the project.

### **Construction Impacts**

Barking Woods SSSI is sensitive to changes in air quality. As such, the construction phase of this development has potential to harm the designated features of the site through pathways such as dust and nitrogen deposition and noise disturbance of birds. These should be considered as the application moves forward and a Construction Environmental Management Plan (CEMP) secured if deemed appropriate.

### **Lighting Strategy**

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

### **Protected Species**

Natural England has produced [standing advice](#)<sup>2</sup> 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 Site of Special Scientific Interest or in exceptional circumstances.

### **Water Abstraction**

Barking Woods SSSI is a water dependent site, meaning that it could be significantly impacted should water abstraction take place. There currently appears to be no mention in the application documents as to where the water supply for this development will come from. As these details are decided, any potential impacts on the designated site should be considered.

### **Sites of Special Scientific Interest**

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

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

If you have any queries relating to the advice in this letter please contact me on 07471515535.

We would not expect to provide further advice on the discharge of planning conditions or obligations attached to any planning permission.

Should the proposal change, please consult us again.

Yours faithfully

Joanna Parfitt  
Norfolk and Suffolk Team

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



### Public Health Suffolk Application Response

Application Name	Needham Market, Agricultural Land North Of, Barking Road IP6 8JF
Application Reference	DC/21/06882/OUT
Application type (delete as appropriate)	Outline Application
Date Response Sent	05 January 2022
Completed By Contact	Dr Mash Maidrag, Public Health Consultant <a href="mailto:Mashbileg.Maidrag@suffolk.gov.uk">Mashbileg.Maidrag@suffolk.gov.uk</a>

#### **Public Health Response**

From the limited information provided in this Needham Market, Agricultural Land North Of, Barking Road Outline Application, it is important to recognise measures within the proposal which help to mitigate the impacts on health outcomes. We welcome the allocation of 100 dwellings as affordable homes, parking allocations for households and visitors.

Appropriate planning and design of the environments in which we live, and work can promote good physical and mental health. Promoting active travel through good connectivity within new developments and existing infrastructure and local and nearby amenities, primary schools, GP Surgery and Needham Market Railway Station can potentially increase activity levels by encouraging walking and cycling and reduce traffic volume and air pollution in the environment.

We acknowledge references to promote active travel within this Outline Plan highlighting existing streets design for pedestrians' footway and cycleways and its connectivity to the new Site.

New signage highlighting destinations and estimated travel time is a good way to both encourage and promote sustainable travel in the area.

We acknowledge the reference around natural and sustainable environment, such as protection and enhancement of valued landscapes (following NPPF 2021 guidance), and support of local wildlife through inclusion of hedgerow trees, urban drainage provision and designated green space and habitat for farmland birds.

#### **Needham Market Demographics, lifestyle and health profile**

More information about the local area is available on public websites including:

- [Ward profile \(Suffolk Observatory\)](https://www.suffolkobservatory.info/overview/?report=3e84a86214f4453581dc6e3204e130c1&feature=E05012604#/view-report/355e134d218e43fda37e52fb98024d6f/E05012604)  
<https://www.suffolkobservatory.info/overview/?report=3e84a86214f4453581dc6e3204e130c1&feature=E05012604#/view-report/355e134d218e43fda37e52fb98024d6f/E05012604>



- Place-based needs assessment (includes Stowmarket and surrounding area):  
[https://www.healthysuffolk.org.uk/uploads/Stowmarket\\_INT\\_PBNA\\_V2.pdf](https://www.healthysuffolk.org.uk/uploads/Stowmarket_INT_PBNA_V2.pdf)
- Wider determinants of health and wellbeing, as well as health profiles at a higher level (CCG, County, District) in the Joint Strategic Needs Assessment <https://www.healthysuffolk.org.uk/jsna>

This development is in the Needham Market Ward which has a population of approximately 6,133 people, with the predominant age ranges of 10-14 years, 25-59 years, and 60-79 years.

Suffolk Observatory data suggests that rates of those experiencing fuel poverty are lower in this ward (8%) than in the surrounding area of Suffolk (10.7%) and England (10.3%). Additionally, 3.3% of houses in this ward do not have central heating. This suggests there is a need for a good quality, energy efficient houses.

There is a high number of people currently living in private rented accommodation: 443 properties are socially rented compared to 697 houses with a mortgage / loan. This suggests that there is a need for affordable housing for families and workers to give people the opportunity to purchase their own homes.

While the population is a mixed age range within this ward, the proportion of over 65s is higher in West Suffolk than in England, and the number of older people is likely to increase as the population ages. This means that houses will need to be adaptable to meet their health needs. Public Health Fingertips data from the GP Quality Outcomes Framework for The Needham Market Country Practice indicates that the prevalence of hypertension (16.6%) and atrial fibrillation (3.0%) among patients show little change since 2019 but is likely to increase as the population ages. The prevalence of dementia in Needham Market Ward (3.94%) similar to England (3.97%) but is also likely to increase with ageing.

**Below are some recommendations linked with the Public Health in Planning Guidance 6 themes listed above:**

<p><b><u>Neighbourhood Design</u></b></p>	<p>The design of neighbourhoods impacts on the health and wellbeing of people living there. Addressing aspects of neighbourhood design such as walkability and mixed land use can maximise opportunities for social engagement and active travel. Equally investing in infrastructure to support walking &amp; cycling is associated with increased physical activity. Meanwhile, provision of green spaces and well-lit walkways can increase mental wellbeing and security.</p> <p>Without any information on the Development design to review we make the following general recommendations:</p> <ul style="list-style-type: none"> <li>• Considerations for shelter, landscaping, street lighting, benches, and seating areas to make spaces attractive and inviting.</li> <li>• Provision of good and safe access connecting the Development Site to existing amenities and public rights of way.</li> <li>• Mitigation of any impact on existing resources in schools and health services using Community Infrastructure Levy to consider as part of the Development to support occupants.</li> <li>• Inclusion of “Happy to Chat Benches” which can support people with their wellbeing by reducing loneliness and social isolation.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Inclusion of a sensory garden space (which include a variety of plants and scents). These can support and improve wellbeing in people with learning difficulties and adults with dementia. (See Natural and Sustainable Environment section below for relevant evidence).</li> </ul>
<u><b>Housing</b></u>	<p>A considerable amount of time is spent daily in the home. It is estimated that 20% of the UK's housing stock does not meet decent home standard and that the cost to the NHS of poor-quality housing is £2.5 billion per annum (BRE, 2010). Living in good quality and affordable housing is associated with numerous positive health outcomes for the general population and those vulnerable groups. Much of the Housing design has been put in the Reserved Matters.</p> <p>We recognise that housing specification is under Reserved Matters and no other document is presented to review. However, we make the following recommendations:</p> <ul style="list-style-type: none"> <li>• Consider the Housing Standard Design M4(2) to make houses more adaptable at a minimal cost which can support an older population.</li> <li>• Ensure there mixed-tenure affordable housing for groups such as older persons, young families, people with care needs and disabilities.</li> <li>• Ensure the development is suitably flood resistant and houses can be refurbished with minimal impact. (NPPF Point 167(b)).</li> </ul>
<u><b>Healthier food environment</b></u>	<p>The food environment plays an important role in promoting a healthy diet, but this is a complex system influenced and determined by a series of factors, including a person's proximity to food retail outlets and the type of food available. Vulnerable groups, and those on a low income, children, young people, those who are overweight or obese, and those of certain ethnicities, are less likely to achieve a healthy and balanced diet. However, existing evidence indicates that making healthier foods more accessible and increasing provision of low-cost healthier food could be effective interventions.</p> <p>There is no information in relation to a healthy food environment.</p> <p>We make the following recommendations:</p> <ul style="list-style-type: none"> <li>• Include an outside space for food growing for each dwelling. This could include allotments / balconies / terraces etc.</li> <li>• Consider linking with local farmers to encourage own food growing initiatives. This could help to promote more active lifestyles, better diets, and social benefits.</li> </ul>
<u><b>Natural &amp; sustainable environment (including Air Quality)</b></u>	<p>There is evidence linking contact and exposure to the natural environment with improved health and wellbeing. The natural and sustainable environment is comprised of neighbourhood ecosystems and the resulting co-benefits between the environment and health. Air quality is also a risk to human health due to emissions such as nitrogen oxides and particulate matter.</p> <p>We would like to highlight the following considerations:      Landscape design:</p>



	<ul style="list-style-type: none"> <li>• Ensure dwellings are close to areas of green space, parks, woodland, and other open space. Provide open and green spaces physical activity for people of all ages.</li> <li>• Provide attractive parks increase visits and social engagement.</li> <li>• Mitigate any flooding risks away from the River Gipping according to the NPPF 2021 point 161(c) and incorporates sustainable drainage systems.</li> </ul> <p>Air Quality:</p> <ul style="list-style-type: none"> <li>• The impacts on air quality of construction and post-construction phases should be carefully considered to mitigate impacts on existing and new residents. The long-term impact of poor air quality has been linked to life-shortening lung and heart conditions, cancer, and diabetes.</li> </ul>
<p><b><u>Active Travel</u></b></p>	<p>Suitable access to the full range of community services that include transportation plays an important role in supporting daily activities. Active travel (cycling, walking and use of public transport) can increase physical activity levels and improve physical and mental wellbeing.</p> <p>To further support this, we make the following recommendations:</p> <ul style="list-style-type: none"> <li>• Incorporate inclusive design principles and relevant pictorial information to be more accessible for those with learning difficulties or disabilities.</li> <li>• Ensure footpaths are wide enough meet Suffolk County Council's recommendation of an inclusive design with footpaths of 2 metres width mitigating any danger to footpath users and those with disabilities or buggies.</li> </ul>

### **Links to evidence**

<p>1. Neighbourhood design</p> <ul style="list-style-type: none"> <li>• Spatial planning for health, PHE June 2018 - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf</a></li> <li>• Associations between neighbourhood walkability and daily steps in adults, BMC August 2015 - <a href="https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-015-2082-x">https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-015-2082-x</a></li> <li>• Behaviour Change Techniques Used to Promote Walking and Cycling, PubMed, 2013 - <a href="https://www.ncbi.nlm.nih.gov/pubmed/23477577">https://www.ncbi.nlm.nih.gov/pubmed/23477577</a></li> <li>• Street lighting for preventing road traffic injuries</li> </ul>
<p>2. Housing</p> <ul style="list-style-type: none"> <li>• Spatial planning for health, PHE June 2018 - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf</a></li> </ul>
<p>3. Healthier food environment</p>



- Spatial planning for health, PHE June 2018 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf)

#### 4. Natural and sustainable environment (including Air Quality)

- Spatial planning for health, PHE June 2018 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf#](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf#)
- The Impact of a Sensory Garden for People with Dementia. Therapeutic Recreation Journal Vol. LIV, No. 1 pp. 48–63 • 2020 <https://doi.org/10.18666/TRJ-2020-V54-I1-10077>
- The Influence of Sensory Gardens on the Behaviour of Children with Special Educational Needs Hussein, H., / Asian Journal of Environment-Behaviour Studies, ajE-Bs, 2(4) Jul /Sep 2017 (p.95-108)

#### 5. Active Travel

- Spatial planning for health, PHE June 2018 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf)
- <https://www.mencap.org.uk/advice-and-support/transport/local-transport-initiatives>
- Sustrans: Cycling for everyone: A guide for inclusive cycling in cities and towns 2019
- Manual for Streets 2007. Department of Transport. YouGov: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/341513/pdfmanforstreets.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf)

#### 6. Wider determinants

- Spatial planning for health, PHE June 2018 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf)

#### 7. National Policy Planning Framework 2021. [www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)

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

Our Ref: 2021\_06882  
Date: 6<sup>th</sup> January 2022

For the Attention of Jasmine Whyard

Dear Mr Isbell

**Planning Application DC/21/06882 – Land north of Barking Road, Needham Market:  
Archaeology**

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

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

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



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

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

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

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).*

**INFORMATIVE:**

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, a second phase of archaeological evaluation (consisting of geophysical survey and trial trenching of the northern part of the application area, as well as further trenching in the southern part of the application area) is required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

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

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

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team

Your ref: DC/21/06882  
Our ref: Needham Market – agricultural land  
north of Barking Road 60216  
Date: 23 December 2021  
Enquiries: Neil McManus  
Tel: 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

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

Dear Jasmine,

**Needham Market: agricultural land north of Barking Road – developer contributions**

I refer to the proposal: application for outline planning permission (access points to be considered, appearance, landscape, layout, and scale to be reserved) Town and Country Planning Act 1990 – erection of up to 279no. dwellings (including 100 affordable) (re-submission of DC/20/05046).

The county council submits a **holding objection** in respect of the lack of information provided by the applicant regarding a land reservation for a new early years setting within the proposed development, which is essential infrastructure and underpins the delivery of sustainable development as set out in the NPPF.

There has been a lack of pre-application engagement by the applicant. The county council previously responded to DC/20/05046 by way of letter dated 27 November 2020, which clearly set out the requirement for a new early years setting within the proposed development. There was no pre-application engagement with the county council in respect of this application, which was disappointing and was contrary to the principles of pre-application engagement and front loading as set out in the NPPF. With the new application there has, again, been no pre-application engagement which is particularly disappointing when the applicant is already aware of the early years situation from the consultation response to the previous application. Paragraph 39 of the NPPF says,

*Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.*

And in paragraph 40 it says,

*Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.*

And paragraph 41 says,

*The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits.*

**Land supply position.** In respect of the 5-year housing land supply position, the Mid Suffolk area has a 9.54-year supply. The consultation on the position statement ended on 17 December 2021. This is a very healthy supply position (if confirmed) and supports the Government’s objective of significantly boosting the supply of homes [NPPF paragraph 60]. On this basis it would seem that the LPA should only support development in the most sustainable locations across the district and also ensure full policy compliance in respect of infrastructure mitigation and affordable homes.

Summary of infrastructure requirements split between CIL/s106:

CIL	Education	
	- Primary school expansion @ £17,268 per place	£1,156,956
	- Secondary school expansion @ £23,775 per place	£1,141,200
	- Sixth form expansion @ £23,775 per place	£237,750
CIL	Libraries improvements @ £216 per dwelling	£60,264
CIL	Household waste @ £124 per dwelling	£34,596
S106	Secondary school transport	£289,200
S106	Early years	
	- New build contribution @ £20,508 per place	£512,700
	- Freehold land – fully serviced	£1
S106	Monitoring fee per obligation trigger point	£412
S106	Highways	tbc

The National Planning Policy Framework (NPPF) [July 2021] paragraph 57 sets out the requirements of planning obligations, which are that they must be:

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

The county council and district councils have a shared approach to calculating infrastructure needs, in the adopted Section 106 Developers Guide to Infrastructure Contributions in Suffolk.

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

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

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

### **Community Infrastructure Levy**

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

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

The details of the impact on local infrastructure serving the proposed development are set out below:

- 1. Education.** The revised NPPF says in paragraph 95, *'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*
  - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
  - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'*

The NPPF in paragraph 106 says, *'Planning policies should:*

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

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

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

The most recent scorecard is 2019 and the national average 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 x 1.00) produces a total of £20,508 per pupil for new build primary schools.

The most recent scorecard is 2019 and the national average new build cost per pupil for secondary schools is £24,929 (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 (£24,929/1.00) produces a total of £24,929 per pupil for new build of secondary 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"*.

SCC anticipates the following pupil yields from a development of 279 dwellings, namely:

- a) Primary school age range, 5-11: 67 pupils. Cost per place is £17,268 (2021/22 costs).
- b) Secondary school age range, 11-16: 48 pupils. Cost per place is £23,775 (2021/22 costs).
- c) Secondary school age range, 16+: 10 pupils. Costs per place is £23,775 (2021/22 costs).

The local schools are Bosmere County Primary School, Stowmarket High School, and Stowupland High School

At the primary school level, the strategy is to expand the existing primary school up to 420-places. On this basis, at the primary school level a future CIL funding bid of at least £1,156,956 (2021/22 costs) will be made.

At the secondary school level, the strategy is to expand existing provision to meet the demands arising from basic need and housing growth. On this basis, at the secondary school level a future CIL funding bid of at least £1,378,950 (2021/22 costs) will be made.

If the Council considers that planning permission should be granted for the proposed development, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the site-specific costs of secondary school transport. The nearest secondary school is over 3-miles from the proposed development and accordingly pupils will be eligible for free school travel. Contribution required as follows:

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

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

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

The recently published guidance from the Department for Education on Delivering schools to support housing growth states in paragraph 16: *"Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we*

*recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”.*

The National Planning Policy Framework (NPPF) [July 2021] contains policies relevant to the location of community services and facilities within schemes, which are important considerations for the LPA to take into account in assessing the best location for a new early years setting – ‘Promoting healthy and safe communities’ in Chapter 8; ‘Making effective use of land’ in Chapter 11; and ‘Achieving well-designed places’ in Chapter 12.

For example, paragraph 93 of the NPPF says,

*To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

*a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

*e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*

And in paragraph 95 of the NPPF it says,

*It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

*a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*

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

And in paragraph 126 of the NPPF it says,

*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.*

And in paragraph 130 of the NPPF it says,

*Planning policies and decisions should ensure that developments:*

*a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

There is helpful planning appeal precedent. For example, land off Station Road, Long Melford, Suffolk in the LPA area of Babergh District Council (DC/18/00606) for up to 150 dwellings under PINS reference APP/D3505/W/18/3214377. This was a recovered appeal in which both the Secretary of State and the Inspector attributed significant weight to the securing of land for a new early years setting. In the Decision letter dated 01 April 2020 the Secretary of State agrees that the inclusion of land for a new early years setting should attract significant weight [paragraph 44].

From these development proposals SCC would anticipate up to 25 FTE pre-school children arising, at a cost per place of £20,508.

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

Where a development proposal is anticipated to create a demand for over 20 FTE places, then a new provision will be sought by the Early Years and Childcare Services. This will include a free site and the construction of suitable premises for a new provision.

The strategy for early years provision would be to provide a new on-site setting.

- It is forecast that up to 44 children ages 2 – 4 will arise, which is the equivalent to 25 FTE places based on one place being 30 hours per week.
- Due to the number of developments emerging in the ward the existing settings are unable to expand to cater for these places arising and the existing deficit.
- A site area large enough to deliver a 60-places setting will be required to futureproof the setting so a minimum site area of 0.1 hectares. There will be the need for a land reservation to be secured within a planning obligation for a flat, fully serviced and free of contamination site to be transferred to SCC for £1. The location will need to be identified and agreed as an integral element of the Masterplan submitted as part of this application. The cost of the county council undertaking a feasibility study to determine the most appropriate location for a new setting will need to be borne by the applicant.
- Land to be used for early years purposes and transferred to SCC prior to first dwelling occupation.
- Planning obligation – financial contribution of £512,700 for SCC to use towards the delivery of a new early years setting for Needham Market, plus freehold transfer of a fully-serviced site of minimum size 0.1 ha to SCC for £1.



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

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

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2019).

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

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e., £60,264, 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 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

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

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

*- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there*

*is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

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

A future CIL funding bid of at least £34,596 (£124 per dwelling) will be made to improve the HWRC provision at Stowmarket and/or Ipswich serving the proposed development.

- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 60 to 65 of the NPPF.

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

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority (LLFA). Paragraphs 159 – 169 refer to planning and flood risk and paragraph 167 states: *'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

*a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

*b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*

*c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*

*d) any residual risk can be safely managed; and*

*e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.'*

And paragraph 169 says, '*Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*

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

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

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

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

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

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

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

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

**14.** 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

cc Sarah Hammond, SCC (education)  
Ben Chester, SCC (highways)  
Jason Skilton, SCC (LLFA)

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

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

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

Date: 22/12/2021

Dear Sir

**AGRICULTURAL LAND NORTH OF BARKING ROAD, NEEDHAM MARKET, IP6 8JJ**

**Planning Application No: DC/21/06882**

**A CONDITION IS REQUIRED FOR FIRE HYDRANTS**

**(see our required conditions)**

I refer to the above application.

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

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

**Water Supplies**

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

/continued

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.

**Sprinklers Advised**

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

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

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: [jason@parkerplanningservices.co.uk](mailto:jason@parkerplanningservices.co.uk)

Enc: Sprinkler information

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

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

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

Date: 22 December 2021

**Planning Ref: DC/21/06882**

Dear Sirs

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

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

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

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service



Created: September 2015

Enquiries to: Fire Business Support Team  
Tel: 01473 260588  
Email: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)



Dear Sir/Madam

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

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

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

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

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

### **Dispelling the Myths of Automatic Fire Sprinklers**

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

### **Promoting the Benefits of Automatic Fire Sprinklers**

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

## OFFICIAL

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

### **The Next Step**

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

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

Suffolk Fire and Rescue Service

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

Residential Sprinkler Association

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

British Automatic Fire Sprinkler Association

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

Fire Protection Association

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

Business Sprinkler Alliance

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

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

Yours faithfully

Chief Fire Officer

Suffolk Fire and Rescue Service

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

**Sent:** 04 Jan 2022 04:26:05

**To:**

**Cc:**

**Subject:** FW: 2021-12-29 JS reply Agricultural Land North Of, Barking Road, Needham Market Ref DC/21/06882

**Attachments:**

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**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>

**Sent:** 29 December 2021 13:58

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

**Cc:** Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>

**Subject:** 2021-12-29 JS reply Agricultural Land North Of, Barking Road, Needham Market Ref DC/21/06882

Dear Jasmine Whyard,

Subject: Agricultural Land North Of, Barking Road, Needham Market, Suffolk Ref DC/21/06882

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06882.

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

- Site Masterplan Ref 043-18-0200\_P5
- Flood Risk Assessment Ref EX1807704 Rev B

A holding objection is necessary because the applicant will need to satisfy that national and local policy/guidance on flooding can be met with the proposed development of the site. There is also additional information required for the disposal of surface water drainage.

1. *National Planning Policy Framework (2021) Paragraph 159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
2. *Mid Suffolk District Council's Core Strategy Policy CS 4 Sept 2008 Flood Risk: The council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.*
3. *The Suffolk Flood Risk Management Strategy 2016 Paragraph 2.5 - Planning authorities should only approve development where it can be demonstrated that the proposal satisfies all the following criteria:*
  - a. *it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and use of appropriate SuDs*
  - b. *it will be adequately protected from flooding;*
  - c. *it is and will remain safe for people for the lifetime of the development*

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

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

1. Applicant needs to demonstrate that only the area's of the site at the lowest flood risk will be development.
2. Due to significant flooding downstream of the site in Needham Market, the applicant is to demonstrate that the proposed development will offer betterment than the existing site usage. A detailed flood risk study has been undertaken by the Environment Agency/LLFA and this shall be acknowledged within the FRA and any recommendations taken on board within the FRA.
  - a. [Surface Water Management Plans – Green Suffolk](#)
3. Applicant needs to provide a plan depicting each drainage catchment which is reference with the FRA.

4. Applicant needs to ensure that there is sufficient space (approx. 12-20% of site) can be maintained for above ground opens SuDS, unless there is clear evidence that this is not appropriate.
5. Applicant needs to demonstrate how the site will be accessed.
  - a. This will need to be either a single span bridge (Suffolk County Council, LLFA preferred option) or a culverted. If a culvert is preferred then a separate Land Drainage Act consent will be required.

**Note: Further information maybe required.**

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure  
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX  
\*\*Note I am remote working for the time being\*\*

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 21 December 2021 20:24

To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/21/06882

Please find attached planning consultation request letter relating to planning application - DC/21/06882 - Agricultural Land North Of, Barking Road, Needham Market, Suffolk

Kind Regards

Planning Support Team

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

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

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

Your Ref: DC/21/06882  
Our Ref: SCC/CON/5734/21  
Date: 6 January 2022  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

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

For the attention of: Jasmine Whyard - MSDC

Dear Jasmine

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/06882**

**PROPOSAL:** Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (resubmission of DC/20/05046).

**LOCATION:** Agricultural Land North Of, Barking Road, Needham Market, Suffolk

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

We raised a number of concerns when previously consulted on application DC/20/05046. These concerns have not been adequately addressed in this application and subsequently, our **recommendation for refusal** remains as detailed below and in the SCC Travel Plan and Passenger Transport team comments:

1. Access onto Barking Road: This is within an area with a known flooding issue and whilst the submitted Transport Assessment (TA) states: *'shall consider a raised priority junction with sufficient highway drainage strategy to reduce the likelihood of flooding and restrict access to the Site'*. This does not adequately address the concern. As requested, a secondary permanent access point is required. This matter should be addressed at outline stage, rather than left as a reserved matter, as suggested.
2. Highway Capacity: Paragraph 4.31 of the TA states: *'The junction analysis contained within this TA includes potential development contained within the BMSDC's emerging Joint Local Plan (where trip generation is available).'* For the avoidance of doubt, please clarify whether any relevant sites from the JLP have been excluded due to trip generation not being readily available. We do not typically consider this a valid reason to exclude sites from cumulative assessments.
3. Pedestrian and cycle links: The proposal to provide an uncontrolled crossing point leading to a substandard width footway at the proposed Barking Road access is not acceptable. This is not suitable for vulnerable road users and it is not a suitable access or termination of a cycle facility. A footway connection on the western side of Barking Road and suitable cycle route terminal are required.

### **SCC Travel Plan team comments:**

No Travel Plan has been submitted for this application, which goes against the requirements in Table 3.3 in the Suffolk Travel Plan Guidance (<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>) and Policy LP32 of the new Babergh and Mid-Suffolk Local Plan. This table is based on Appendix B in the DfT Guidance on Transport Assessment, which is still regarded as best practice amongst Transport Practitioners. These thresholds would measure what would be a significant highway impact in accordance with paragraph 113 of the NPPF.

Any Travel Plan submitted must include the following:

- To appoint a Travel Plan Coordinator prior to the occupation of the development
- A commitment to provide each dwelling a resident travel information pack with a multi-modal voucher to the value of two one month bus tickets. This voucher can be used towards the purchase of bus tickets, rail tickets or a cycle voucher
- Further measures such as keeping the residents engaged with the Travel Plan through newsletters, social media and on-site event days
- A commitment to monitor the Travel Plan from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling (whichever is the longest duration) in accordance with Suffolk County Council's monitoring requirements
- A budget to demonstrate that sufficient funds will be allocated to fully deliver the Travel Plan
- A commitment to pay a £1,000 per annum Travel Plan Evaluation and Support Section 106 Contribution to Suffolk County Council from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling (whichever is the longest duration)

As an alternative, Suffolk County Council are also able to take on the function of taking on the implementation and monitoring of the Travel Plan for a Section 106 contribution of £110,755. This will need to be formally agreed by the Applicant prior to the determination of this planning application.

On review of the Transport Assessment some further work will need to be put into the public transport measures, as the document identifies that there are no bus services that serve the stops nearest to the development. To help address this issue the Applicant should approach some of the local bus operators to see there are any opportunities to divert, or provide new bus services for this development. Evidence and the outcomes of these discussions should be submitted as part of the planning consultation process to comply with the requirement of paragraph 110 of the NPPF.

**A Travel Plan or Technical Note that addresses these comments above will need to be submitted prior to the determination of this application.**

## SCC Passenger Transport team comments:

Specifically here, we have no service along Barking Road at present, and the 88 Ipswich – Stowmarket route sticks to the B1113 which makes the nearest stops around 750m from the site entrance and significantly more to the houses at the far end. **This obviously exceeds the 400m guideline so the site should probably be refused as unviable on that basis unless they are going to fund a new service.** First previously ran the 88 around Foxglove Ave/Chainhouse Road and those stops still exist in the database (although I am not sure if they are currently marked on site). It is unlikely that First would want to go back to this route as it doesn't fit their "fast end-to-end with few diversions" philosophy for commercial routes, so even with suitable financial inducements there is no way we will get them to serve the new development.

It might, however, be possible to get them to restore the Foxglove loop which would bring services closer to the new homes. If pedestrian routes were created between the new site and Foxglove (via the car parking at the south end, and Football club access/Quinton Road at the north) that would cut the walking distance significantly and bring a further 300 or so homes back into sensible distance of a bus stop as well as the new ones. Such a diversion would need two additional buses for the 88 corridor at around £200,000 per year. Because the diversion only serves existing roads, it could be started immediately which would ensure buses were running when the first new home is sold. It would also give the current residents their service back sooner, meaning commercial viability could also be reached sooner and bringing the annual cost down. Assuming a 4-year build-out for the site it should be possible to get the route viable for under the £800,000 that a £200k/year figure would imply. I'd need to get First involved to do the maths from their end before committing to a final figure though.

Alternatively, I know there is some demand for a Bildeston area – Stowmarket service which could also cover this site, the Foxglove loop and possibly also the Hurstlea Road loop that First dropped at the same time as Foxglove. This could connect with Ipswich-bound 88s on the High Street. This could potentially serve the new estate – especially if the northern access as marked on the plan is made permanent and the access to the football club improved to allow a link through to Quinton Road. That would then need 3 -6 new stop pairs within the development depending on whether buses ran in, around and out or through on one side or the other. If they don't go on site, the ped links mentioned would still be required, we could also then create a pair of stops on the B1078 Barking Road which would serve the site and also the health centre. Given the nature of the roads, this would also need two buses to guarantee an hourly service so a similar figure per year. I'm not so certain that this route could end up being fully commercial, but a 4-5 year commitment would give us time to assess it properly and seek additional funding to keep it going once the developer contribution ran out.

The third option would be to bring buses this far as part of a new and improved Stowmarket/Stowupland town service which will also cover Cedars park and the new developments to the north/west of Stow. If funds from those and this site were pooled we could probably get 7-8 years of guaranteed service before it needed to be viable.

For any of those options I would also be looking for stop improvements on Foxglove/Chainhouse and possibly Hurstlea Road. Average £10k per stop with between 6 and 12 stops being improved depending on which routes happen. That would enable all the kerbs to be raised and a couple of shelters/screens at the key points. So max infrastructure contribution of £120k +/- what they build on site.

A final option for getting something onto the site would be a demand responsive service that could link up with 88 on the high street and also the station. That could probably be delivered for around £100,000 per year and could again cover the bits stopped by First as well as the new homes. Neither of the current services on this model have been running long enough to judge whether they can become viable longer term, but worth a try as a back-up plan.

**No comments received as yet from SCC PROW Team.**

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**  
Growth, Highways and Infrastructure



**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 08 Mar 2022 02:29:28

**To:**

**Cc:**

**Subject:** FW: Minerals consultation

**Attachments:**

---

**From:** Ross Walker <[Ross.Walker@suffolk.gov.uk](mailto:Ross.Walker@suffolk.gov.uk)>

**Sent:** 08 March 2022 09:52

**To:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>

**Cc:** Andrew Sierakowski <[Andrew.Sierakowski@suffolk.gov.uk](mailto:Andrew.Sierakowski@suffolk.gov.uk)>

**Subject:** RE: Minerals consultation

Hello Jasmine,

Thank you for consulting the Suffolk Minerals and Waste department on application DC/21/06882.

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

This Proposal is 15 Ha which is above the 5Ha threshold for safeguarded areas as outlined in Policy MP10: Minerals Consultation and safeguarding areas.

We request further information on the Mineral deposit at this safeguarded location:

We request that a 'Borehole and grading analysis' be carried out detailing the economic viability of the deposit which will be submitted to and assessed by the Local minerals Authority. If material is found on site and it is deemed to be economical viable for extraction an application should be submitted to the Local Minerals Authority for extraction. If material is found and it is not economically viable for extraction but can be used within the project we would ask for conditions to be put in place to require the material be used on site in the proposed development where possible.

Please do get in touch if you have any questions.

Kind Regards

Ross Walker  
Planning Officer  
Strategic Development  
Suffolk County Council  
T: 01473265071  
E-mail: [Ross.Walker@suffolk.gov.uk](mailto:Ross.Walker@suffolk.gov.uk)

Ross.

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 14 Feb 2022 11:18:46

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

**Attachments:**

---

**From:** David Falk <david.falk@suffolk.gov.uk>

**Sent:** 14 February 2022 09:53

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

**Cc:** Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Andrew Woodin <Andrew.woodin@suffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>; Kevin Verlander <Kevin.Verlander@suffolk.gov.uk>; GHI PROW Planning <PROWplanning@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

## **PUBLIC RIGHTS OF WAY AND ACCESS – FURTHER RESPONSE**

**REF: DC/21/06882**

Further to the response below, the rights of way and access team would like to make additional comments:

- **We have concerns over the proposal for a second main entrance at the north east of the development.**
- **Access from this point would be over Needham Market Bridleway 15 (The Drift).**
- **A second main entrance has been previously described as an emergency access only. If this is now proposed as a main entrance then it will have an adverse impact on the use of Needham Market Bridleway 15.**
- **Should the development be permitted then Needham Market Bridleway 15 will need to be fully segregated from the access. This will require a 3m width with appropriate surfacing and safe crossing points of all carriageways to ensure safe continued use of Needham Market Bridleway 15.**

Public Rights of Way Team

Growth, Highways and Infrastructure

Suffolk County Council

Phoenix House, 3 Goddard Road, Ipswich IP1 5NP

[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

---

**From:** GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

**Sent:** 07 January 2022 17:02

**To:** BMSDC Planning Area Team Blue <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>

**Cc:** GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>; Sharon Berry (MSDC) <[Sharon.Berry@babberghmidsuffolk.gov.uk](mailto:Sharon.Berry@babberghmidsuffolk.gov.uk)>; Andrew Woodin <[Andrew.woodin@suffolk.gov.uk](mailto:Andrew.woodin@suffolk.gov.uk)>; Ben Chester <[Ben.Chester@suffolk.gov.uk](mailto:Ben.Chester@suffolk.gov.uk)>; Kevin Verlander <[Kevin.Verlander@suffolk.gov.uk](mailto:Kevin.Verlander@suffolk.gov.uk)>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/21/06882**

Thank you for your consultation concerning the above application.

The proposed site does not contain any public rights of way (PROW) but will create access onto an extensive network of public rights of way in the area. The Definitive Map for Needham Market can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Needham-Market.pdf> and for Barking can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Barking.pdf> but more detailed plots of public rights of way must be requested by the Applicant to accurately plot PROW on relevant plans. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.

We largely accept this proposal. It is anticipated that a large development such as this will lead to a significant increase in footfall on the local PROW network, therefore some works are necessary to improve and safeguard the quality of the network. To this end, we would request the following (please see attached plan for reference points and suggested routes):

1. The developer includes in the site layout an pedestrian / cycle route of ideally 3 metres width set within a green corridor through the site linking The Drift (Bridleway 15 Needham Market) in the north-eastern corner of the development, to Barking Road on the south-eastern side of the development. We would like to see the southern end of this link onto Barking Road at a separate point from the vehicular entrance to the development to give a safe, continuous, fully accessible non-vehicular route all the way through the site from north to south.
2. £500 under s106 to enable us to install a new set of steps and a handrail on Footpath 47 Barking.
3. (3a and 3b) £23,600 under s106 to lay a new sealed surface on parts of Bridleway 15 Needham Market.
4. £4,800 under s106 to install a new bridleway bridge on Bridleway 26 Barking.
5. £19,400 under s106 to lay a new unsealed surface and carry out clearance works on a section of Footpath 1 Needham Market.
6. Creation of a new 2 metre wide unsealed surfaced public footpath as shown at point 6 of the attached plan, along the western side of the hedge. Having carried out a map search with HM Land Registry (see attached), it appears that this parcel of land is in the same ownership as the development site, therefore it should be within the landowner's gift to agree to the creation. £31,700 under s106 would be required for the legal works, clearance, construction and surfacing, and the installation of a footbridge.

**Total s106 contribution request = £80,000**

We would also highlight the following:

Suffolk County Council's Green Access Strategy (2020-2030) sets out the council's commitment to ensuring and promoting sustainable travel options for all. The strategy focuses on walking and cycling for commuting, accessing services and facilities, and for leisure reasons. Specifically, 2.1 "Seeks opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils and partnership working."

The Public Rights of Way network supports all 3 of the overarching objectives of the Ministry of Housing Communities & Local Government's (MHCLG) National Planning Policy Framework (NPPF) (v3.0 2021):

1. Build a strong, responsive and competitive economy;
2. Support strong, vibrant and healthy communities;
3. Protect and enhance our natural, built and historic environment.

The NPPF refers to the Public Rights of Way network specifically:

100. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails;

**In addition, the Public Rights of Way network supports NPPF sections:**

85. make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport);  
92. achieve healthy, inclusive and safe places a) ...that allow for easy pedestrian and cycle connections within and between neighbourhoods; b) ...use of attractive, well-designed, clear and legible pedestrian and cycle routes; c) support healthy lifestyles,... through the provision of safe and accessible green infrastructure,... that encourage walking and cycling;  
98. Access to a network of high quality open spaces;  
104. c) opportunities to promote walking, cycling and public transport use are identified and pursued;  
106. d) provide for attractive and well-designed walking and cycling networks;  
112. a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;  
112. c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles.

**Furthermore, we ask that the following is taken into account:**

1. **PROW MUST remain open, unobstructed, and safe for the public to use at all times**, including throughout any construction period. If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed as per point 4 below.
2. PROW are divided into the following classifications:
  - Public Footpath – only for use on foot or with a mobility vehicle
  - Public Bridleway – use as per a public footpath, and on horseback or by bicycle

- Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, eg a horse and carriage
- Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

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

3. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.
4. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It **DOES NOT** give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
  - To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
  - To apply for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
5. **To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted as early an opportunity as possible** to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
6. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
7. Any hedges adjacent to PROW must be planted a minimum of 1.0 metres from the edge of the path in order to allow for annual growth. The landowner is responsible for the maintenance of the hedge and hedges must not obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metre from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

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

Thank you for taking the time to consider this response.

Public Rights of Way Team  
 Growth, Highways and Infrastructure  
 Suffolk County Council  
 Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 21 December 2021 20:24

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

Please find attached planning consultation request letter relating to planning application - DC/21/06882 - Agricultural Land North Of, Barking Road, Needham Market, Suffolk

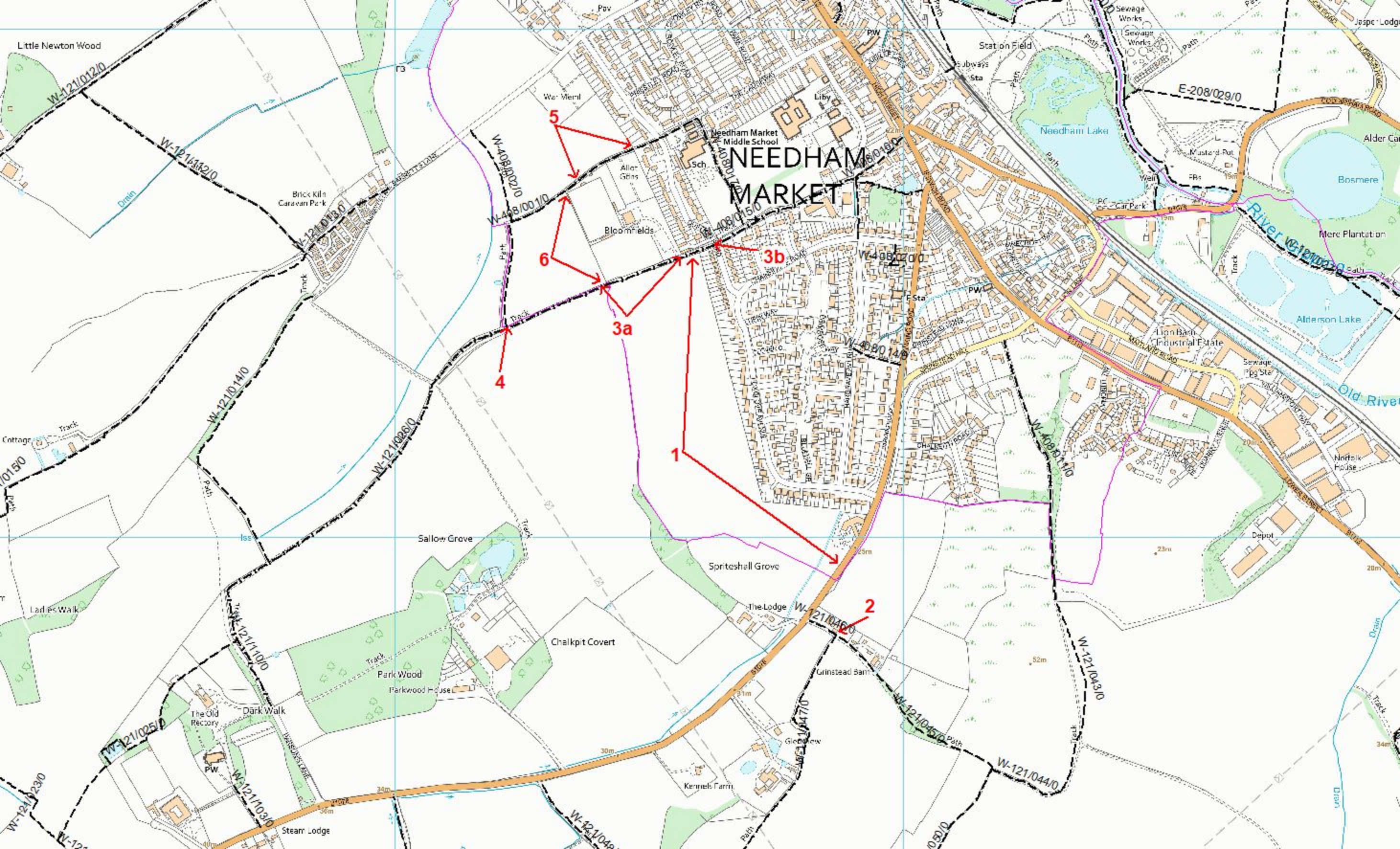
Kind Regards

Planning Support Team

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

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

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



# NEEDHAM MARKET

5

6

3b

3a

4

1

2

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 10 Jan 2022 12:03:02

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

**Attachments:** 2020-11-20 PROW request plan.JPG, ufm88\_Standard\_Consultation.pdf

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

**Sent:** 07 January 2022 17:02

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

**Cc:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Andrew Woodin <Andrew.woodin@suffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>; Kevin Verlander <Kevin.Verlander@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/21/06882**

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**Our response to this application mirrors our response dated 20 November 2020 to consultation DC/20/05046/OUT.**

**We largely accept this proposal. It is anticipated that a large development such as this will lead to a significant increase in footfall on the local PROW network, therefore some works are necessary to improve and safeguard the quality of the network. To this end, we would request the following (please see attached plan for reference points and suggested routes):**

- 1. The developer includes in the site layout an pedestrian / cycle route of ideally 3 metres width set within a green corridor through the site linking The Drift (Bridleway 15 Needham Market) in the north-eastern corner of the development, to Barking Road on the south-eastern side of the development. We would like to see the southern end of this link onto Barking Road at a separate point from the vehicular entrance to the development to give a safe, continuous, fully accessible non-vehicular route all the way through the site from north to south.**
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- All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk).
3. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.
  4. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It **DOES NOT** give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
    - To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. **PLEASE NOTE** that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.



- To apply for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.

5. **To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible** to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> **PLEASE NOTE** that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
6. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
7. Any hedges adjacent to PROW must be planted a minimum of 1.0 metres from the edge of the path in order to allow for annual growth. The landowner is responsible for the maintenance of the hedge and hedges must not obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metre from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

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

Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council  
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 21 December 2021 20:24

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/21/06882 \*Agricultural Land North Of, Barking Road, Needham Market

Please find attached planning consultation request letter relating to planning application - DC/21/06882 - Agricultural Land North Of, Barking Road, Needham Market, Suffolk

Kind Regards

Planning Support Team

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

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

**From:** Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>  
**Sent:** 12 Jan 2022 03:43:40  
**To:**  
**Cc:**  
**Subject:** FW: DC/21/06882 - Barking Road, Needham Market  
**Attachments:**

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**From:** Chris Ward <Chris.Ward@suffolk.gov.uk>  
**Sent:** 12 January 2022 12:17  
**To:** Jason Parker <jason@parkerplanningservices.co.uk>  
**Cc:** Magnus Magnusson <magnus@parkerplanningservices.co.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>; Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>  
**Subject:** RE: DC/21/06882 - Barking Road, Needham Market

Dear Jason,

Thank you for getting in contact with me. There are more detailed comments on the Travel Plan element included in the Suffolk County Council Highway Response dated 6<sup>th</sup> January 2022 about what will need to be agreed at this stage to ensure a suitable Travel Plan is secured at a later stage. It cannot be solely dealt with at the reserved matters stage, as I will require further evidence on some additional sustainable transport measures that need to be investigated prior to the determination of this application (e.g. bus service improvements & walking and cycling links). Some of these measures will require Section 106 contributions that I will not be able to request at the reserved matters stage, and some may require additional planning conditions that will need to be secured as part of the outline planning application.

If you could please submit a response to the Travel Plan section in the Highway response that all the requested actions have been agreed by yourselves and completed, I should then be able to recommend a way forward in securing the Travel Plan.


Kind regards

**Chris Ward**  
Active Travel Officer  
Transport Strategy  
Strategic Development - Growth, Highways and Infrastructure  
Suffolk County Council  
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX  
Telephone: 01473 264970  
Mobile: 07860 832202  
email : [chris.ward@suffolk.gov.uk](mailto:chris.ward@suffolk.gov.uk)  
web : [www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/](http://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/) & [www.thewaytogosuffolk.org.uk](http://www.thewaytogosuffolk.org.uk)



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**From:** Jason Parker <[jason@parkerplanningservices.co.uk](mailto:jason@parkerplanningservices.co.uk)>  
**Sent:** 06 January 2022 16:41  
**To:** Chris Ward <[Chris.Ward@suffolk.gov.uk](mailto:Chris.Ward@suffolk.gov.uk)>  
**Cc:** Magnus Magnusson <[magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk)>  
**Subject:** DC/21/06882 - Barking Road, Needham Market

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

Dear Chris,

I have read your response in relation to the above. We would be pleased for a planning condition to be imposed in relation to requiring a travel plan to be prepared prior to the submission of the reserved matters application. You will note that this application is for 'outline' permission for 'up to 279 dwellings' and the number of dwellings may be reduced of course and the site layout and other aspects of the scheme are not being requested at this stage, as it is an outline application with all matters reserved apart from access.

I wonder therefore if we can agree for a planning condition to be imposed to require it to be submitted as part of the reserved matters application?

Kindest regards  
Jason



JASON PARKER  
Director & Head of Planning  
01603 516319 / 07538 463044  
[jason@parkerplanningservices.co.uk](mailto:jason@parkerplanningservices.co.uk)  
[www.parkerplanningservices.co.uk](http://www.parkerplanningservices.co.uk)

Offices in: Norfolk Suffolk Cambs Lincs  
Essex



**From:** Chris Ward <Chris.Ward@suffolk.gov.uk>  
**Sent:** 23 December 2021 09:50  
**To:** Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>  
**Cc:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>  
**Subject:** RE: MSDC Planning Consultation Request - DC/21/06882

Dear Jasmine,

Thank you for consulting me about the proposed residential development at Land North of Barking Road in Needham Market. Having had the chance to review the planning documents submitted, I would like to object to this planning application, as no Travel Plan has been submitted.

According to Table 3.3 in the Suffolk Travel Plan Guidance (<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>) a residential development of up to 279 dwellings will require a Travel Plan. This requirement is further supported by Policy LP32 in the new Local Plan.

Either a Travel Plan, a Technical Note to produce a Travel Plan at a later date in accordance with the requirements in the Suffolk Travel Plan Guidance, or a commitment to pay Suffolk County Council a Section 106 contribution to deliver the Travel Plan on behalf of the developer will need to be submitted for review by Suffolk County Council (as Highway Authority) prior to the determination of this application.

More detailed comments will follow in the formal Suffolk County Council Highways response that Ben Chester is leading on.

Kind regards

**Chris Ward**  
Active Travel Officer  
Transport Strategy  
Strategic Development - Growth, Highways and Infrastructure  
Suffolk County Council

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

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

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

**From:** [planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk) <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>  
**Sent:** 21 December 2021 20:23  
**To:** Chris Ward  
**Subject:** MSDC Planning Consultation Request - DC/21/06882

Please find attached planning consultation request letter relating to planning application - DC/21/06882 - Agricultural Land North Of, Barking Road, Needham Market, Suffolk

Kind Regards

Planning Support Team

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

**Sent:** 12 Jan 2022 03:12:32

**To:**

**Cc:**

**Subject:** FW: (301926) DC/21/06882. Air Quality.

**Attachments:**

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**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

**Sent:** 12 January 2022 12:56

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

**Cc:** Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>

**Subject:** (301926) DC/21/06882. Air Quality.

**EP Reference : 301926**

**DC/21/06882. Air Quality.**

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

**Outline PP (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) T&C Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).**

Many thanks for your request for comments in relation to the above application. I can confirm that I have no cause to amend my comments made at the 2020 planning application.

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](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*



25<sup>th</sup> January 2022

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

By email only

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

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**Application:** DC/21/06882  
**Location:** Agricultural Land North Of Barking Road Needham Market Suffolk  
**Proposal:** Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Dear Jasmine,

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

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

### **Summary**

We have reviewed the Ecological Impact Assessment (Parker Planning Services Ltd, December 2018), and Planning Supporting Statement (Parker Planning Services Ltd, November 2021) provided by the applicant, relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of proportionate mitigation measures.

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

This is because the Ecological Impact Assessment submitted in support of this application is out of date, following CIEEM<sup>1</sup> and Government Guidance<sup>2</sup> (Protected species and development: advice for local planning authorities).

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

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



Despite the statement in paragraph 5.34 that a walkover survey undertaken in September 2020 (over 12 months prior to the Planning Supporting Statement) that conditions on site have not changed, there is no detailed justification in the ecology report submitted or evidence that a walkover survey was undertaken or consideration of mobile species.

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

Based on Appeal decisions, Place Services ecologists always advise that the LPA requires certainty of likely impacts on protected species *prior to determination* so we refute the statement in paragraph 5.36 of the Planning Supporting Statement that an indication was given that new data or surveys could be secured by a condition of any consent.

We therefore stand by our comments that additional surveys for protected species likely to be present and affected by the development are necessary and recommend that updated surveys by a professional ecologist and provision of a revised Ecological Impact Assessment report are provided.

We still do not consider that the Dormouse or reptile surveys are up to date *or fit for purpose*. This is because the surveys conducted in 2016 by Southern Ecological Solutions Ltd for the refused application (3506/16) were only carried out on the southern part of the site. Therefore, it is recommended that these surveys are updated to support this application. In particular, it is highlighted that Hazel Dormice are a notoriously difficult species to survey and a lack of evidence within 2016 does not necessarily mean that the species is likely absent from the site boundaries if the habitat is suitable and connectivity across the wider landscape is present.

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

All necessary further surveys must be undertaken by suitably qualified ecologists at the appropriate time of year using standard methodologies.

We also note that the Ecological Impact Assessment has identified that development will result in the loss of between 1.4 and 4.2 estimated nesting territories of Skylark within the site based on average nesting densities on arable farmland. Therefore, it is recommended that a Farmland Bird Mitigation

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



Strategy will be required to secure offsite compensation for the maximum number of nesting territories that could be present on the site. Therefore, the proposed offer to provide nesting opportunities for other BoCC Red listed species is not considered appropriate as it involves no measures for Skylark, a Priority farmland bird.

The Farmland Bird Mitigation Strategy would require the delivery of two Skylark plots for every Skylark territory lost or displaced, following the methodology for the Agri-Environment Scheme option: '[AB4 Skylark Plots](#)'. The Skylark plots should be secured in nearby agricultural land for a period of 10 years. This could include correspondence with [Whirledge & Nott](#) who may be able to secure delivery of the bespoke mitigation strategy under a stand alone agreement or alternatively, if appropriate nearby agricultural land within the applicant's control can be provided, details for the Skylarks plots can be included in the Farmland Bird Mitigation Strategy.

We recommend that all development includes reasonable biodiversity enhancements to meet paragraphs 170d and 180d of the NPPF 2021 and expect a Biodiversity Net Gain (BNG) feasibility report to be provided to demonstrate losses and gains for the development. Should this report show that net gain can be delivered, a final design stage BNG report can be secured by a condition of any consent to be discharged at Reserved Matters stage. We therefore also request further information on net gains as paragraph 5.3 is currently insufficient.

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

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

Please contact us with any queries.

Yours sincerely,

**Sue Hooton CEnv MCIEEM BSc (Hons)**

Principal Ecological Consultant

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

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

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



# **Consultee Comments for Planning Application DC/21/06882**

## **Application Summary**

Application Number: DC/21/06882

Address: Agricultural Land North Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 -  
Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Case Officer: Jasmine Whyard

## **Consultee Details**

Name: Miss Katherine Pannifer

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

Email: Not Available

On Behalf Of: Heritage Team

## **Comments**

I have no comments to provide on behalf of Heritage team for this proposal. The comments provided on previous application DC/20/05046 remain relevant.

Kind regards,

Katherine Pannifer

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

**Sent:** 11 Jan 2022 02:05:09

**To:**

**Cc:**

**Subject:** FW: (301928) DC/21/06882. Land Contamination

**Attachments:**

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**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

**Sent:** 11 January 2022 10:01

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

**Cc:** Jasmine Whyard <Jasmine.Whyard@baberghmidsuffolk.gov.uk>

**Subject:** (301928) DC/21/06882. Land Contamination

**EP Reference : 301928**

**DC/21/06882. Land Contamination**

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

**Outline PP (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) T&C Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).**

Many thanks for your request for comments in relation to the above application. I can confirm that I have no comments to make with respect to land contamination as all such issues were dealt with and addressed at the outline permission stage.

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](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*



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

11/01/2022

For the attention of: Jasmine Whyard

**Ref: DC/21/06882; Agricultural Land North Of, Barking Road, Needham Market, Suffolk**

Thank you for consulting us on the application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279 No dwellings (including 100 affordable) (re-submission of DC/20/05046). This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

This is a re-submission of a previously refused application, therefore a significant proportion of our application assessment and recommendations are unchanged.

The existing site (estimated 16.2ha) is a large-scale sloping open arable fields with field boundaries marked by hedgerows in varying condition. The eastern boundary abuts existing residential development, the western boundary by agriculture fields and priority habitat deciduous woodland, the north by the football ground adjacent to PRoW (bridleway W-408/015/0) known as 'the Drift' and the south by the B1078, Barking Road.

This site is identified as potentially suitable land for residential development in the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA 2020) (Site SS0028). However, the Landscape Sensitivity Assessment (LUC, 2020) states that *"development of the site is likely to be perceived as an advancement into the undeveloped countryside"* and that the *"landscape makes a positive contribution to the rural setting and character of Needham Market and provides a rural backdrop to existing settlement... The development of the site is likely to be perceived as encroachment into the countryside. Other sensitive features including the sloping landform, undeveloped backdrop provided to existing settlement, open views and deciduous woodland habitat"*. The assessment concluded that the site would have an overall moderate landscape sensitivity to residential development.

The site is adjacent to a Special Landscape Area (SLA). Policy CL2 Special Landscape Areas of the Mid Suffolk Local Plan (1998) Saved Policies states that development proposals in Special Landscape Areas *"will only be permitted where they maintain or enhance the special landscape qualities of the area and ensure that the proposal is designed and sited so as to harmonise with the landscape setting."* Although the site is not located within the SLA and the designation has not been carried forward into the emerging Joint Local Plan the intrinsic value of the landscape remains and should be protected.

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

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

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

In regard to Landscape: *“ The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character.”*

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

### **Review of submitted information**

A revised layout has been submitted (Site Masterplan 043-18-0200\_P5) which includes some minor layout changes, though the location and density of the built form and proposed green infrastructure remains largely unchanged from the previous application DC/20/05046.

The submitted Landscape and Visual impact Appraisal (LVA) (Document ref: LFM/PPL/NEE/LA01) has been resubmitted without change or addition, therefore our previous comments still apply.

We would once again draw attention to fact the site is identified as having an agricultural land classification of Grade 2, which means it is 'very good quality agricultural land' quality with minor limitations which affect crop yield, cultivations or harvesting. Defra estimates that combined Grade 1 and 2 only account for 21% of all agricultural land in England. While the site is under the 20 hectares Best and Most Versatile (BMV) threshold, we believe the permanent and unreversible loss of this high grade agricultural land would be of significance.

Furthermore, this grade of land is given a higher status when considering development as NPPF Para 174 states:

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

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

In summary, we are of the judgement that the proposed development will bring forth adverse harm to this landscape, its geodiversity, rural setting and character , all of which are contrary to Policy CS5. Therefore, on this basis we cannot be supportive of this outline planning application.

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

Kind regards,

Kim Howell BA (Hons) DipLA CMLI  
Landscape Consultant

**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:** Susan Lennard <[Susan.Lennard@babberghmidsuffolk.gov.uk](mailto:Susan.Lennard@babberghmidsuffolk.gov.uk)>  
**Sent:** 10 January 2022 14:43  
**To:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>  
**Cc:** Susan Lennard <[Susan.Lennard@babberghmidsuffolk.gov.uk](mailto:Susan.Lennard@babberghmidsuffolk.gov.uk)>; Andy Rutson-Edwards <[Andy.Rutson-Edwards@babberghmidsuffolk.gov.uk](mailto:Andy.Rutson-Edwards@babberghmidsuffolk.gov.uk)>  
**Subject:** PLANNING APPLICATION DC/21/06882 NEEDHAM MARKET

**PLANNING APPLICATION: DC/21/06882**

**OUR REFERENCE: 301981**

**PROPOSAL: Outline PP (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) T&C Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).**

**LOCATION: Land to the north west of Barking Road, Needham Market, Ipswich.**

**CONSULTEE COMMENTS: Noise, light, odour, smoke.**

Dear Sirs

I write with regard to the above planning consultation. Having reviewed the planning documentation I would offer the following observations as follows;

- This application is a re submission of a previously refused application for outline permission DC/20/05046
- The application site is bordered on its eastern elevation by residential dwellings and along the northern elevation by the Needham Market Football Club. The intensity and precise nature of use of this facility is not known.
- The Environmental Protection team requested that a noise and light assessment be undertaken by a suitably qualified consultant in consultation with the Environmental Protection Team and submitted to the LPA prior to determination to enable consideration of the likely impact of the facility on the occupants of the proposed dwellings.
- In the Planning statement submitted by Parker Planning services in connection with this most recent application, Section 5.44 states;

### ***Noise and Light***

***Refusal reason 7 pertaining to the previous application (appendix A) related to insufficient information having been submitted to demonstrate that existing noise and light pollution from Needham Market Football ground and training pitch would not detrimentally affect future occupants of the site on the basis of their location and proximity to the club. It is not considered that noise and light pollution would cause significant 'harm' to future occupiers of the dwellings given how infrequently the matches and training take place at the football club. Furthermore, matches and training rarely go beyond 10pm in the evening. Furthermore, there are many examples of residential developments being built in close proximity of sporting venues.***

- No additional information has therefore been provided in relation to our previous request for a noise and light assessment.

Whilst we understand that many such sporting facilities operate in areas of mixed residential, it is important to consider both the current and future impact such a facility may have on the future occupants of the proposed dwellings having regard to the nature, frequency and intensity of use. There is currently insufficient information provided in order for us to assess these aspects in relation to the proposal. We would therefore reiterate the requirement for a noise and light assessment to be undertaken and submitted to the LPA. The assessment should detail;

- The current hours of use/opening of the football club.
- Current licensing or planning restrictions to include activities permitted and hours of opening/use.
- Nature of activities undertaken on the pitches ie uses other than football.
- Proximity of proposed dwellings along northern boundary of site having regard to siting, orientation and planting belt.
- Current lighting emitted from site along northern boundary.
- Any mitigation measures proposed having regard to noise and or light to include proximity of dwellings to the northern boundary of the site, height and orientation of dwellings, provision of area of recreational land and any associated screening along this northern boundary to create space between the boundary and the proposed dwellings.

Once we have received this information we will be able to provide further comments.

**Sue Lennard**  
**Senior Environmental Protection Officer**  
**Public Protection**

**Please note I am a part time officer working each Monday Tuesday and Wednesday each week.**

**Babergh and Mid Suffolk District Councils – Working Together**

[Susan.lennard@baberghmidsuffolk.gov.uk](mailto:Susan.lennard@baberghmidsuffolk.gov.uk)

01449 724943

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

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

From: BMSDC Public Realm Consultation Mailbox

<[consultpublicrealm@baberghmidsuffolk.gov.uk](mailto:consultpublicrealm@baberghmidsuffolk.gov.uk)>

Sent: 05 January 2022 15:31

To: BMSDC Planning Area Team Blue <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Subject: RE: MSDC Planning Consultation Request - DC/21/06882

Public Realm Officers have no additional comments to make at this stage. Comments made on the previous (refused) application DC/20/05046 are still relevant and appropriate for this revised application

Regards

Dave Hughes

Public Realm Officer

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 21 December 2021 20:21

To: BMSDC Public Realm Consultation Mailbox

<[consultpublicrealm@baberghmidsuffolk.gov.uk](mailto:consultpublicrealm@baberghmidsuffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/21/06882

Please find attached planning consultation request letter relating to planning application - DC/21/06882 - Agricultural Land North Of, Barking Road, Needham Market, Suffolk

Kind Regards

Planning Support Team

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

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

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



**From:** Peter Chisnall <Peter.Chisnall@babberghmidsuffolk.gov.uk>

**Sent:** 10 January 2022 14:03

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

**Subject:** DC/21/06882

Dear Jasmine,

## **APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/21/06882**

**Proposal:** Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (resubmission of DC/20/05046).

**Location:** Agricultural Land North Of, Barking Road, Needham Market, Suffolk

Many thanks for your request to comment on the Sustainability and Climate Change related aspects of this application.

I hve viewed the applicant's documents, namely the Planning, Design and ACCESS statements.

It is disappointing that the Applicants have not addressed my initial comments included in my response to the previous application, namely whilst the application is for outline permission however some consideration of this topic area is expected at this stage.

There is scant mention of Sustainability and no mention of Climate Change mitigation in any of the documents.

Considering we are in the midst of a Climate and Ecological Emergency this is disappointing, when the national target is to achieve net zero, i.e. 100% Carbon emission reduction by 2050, only 28 years away. With developments constructed with levels of insulation, fabric measures and low carbon building services just equal or slightly better the current building regulations' Part L requirements it is likely that they will need to be retrofitted within a few years. The other issue is that the properties will be more expensive to heat in the winter and may overheat in the summer.

Therefore I recommend refusal of this application. if the planning department decided to permit and set conditions on the application taking into account my above comments, I would recommend the following.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a

clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

A Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water ( suggested maximum of 105ltr per person per day).

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

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

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

Guidance can be found at the following locations:

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

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

Regards,

Peter

**Peter Chisnall**, CEnv, MIEMA, CEnvH, MCIEH  
Environmental Management Officer  
**Babergh and Mid Suffolk District Council - Working Together**  
Tel: 01449 724611  
Mob.: 07849 353674  
Email: [peter.chisnall@baberghmidsuffolk.gov.uk](mailto:peter.chisnall@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

To: Jasmine Whyard – Planning Officer  
From: Robert Feakes – Housing Enabling Officer  
Date: 11 January 2022  
Subject: Outline Planning Application  
Proposal: DC/21/06882

Application for outline planning permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Location: Agricultural Land North Of Barking Road Needham Market Suffolk

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**1. Key Points**

<p><b>Support:</b> The applicant is proposing 100 affordable homes, which equates to more than 35% of the development. Hence policy compliance is being achieved. However, planning officers / committee will need to assess how to consider over-provision at the point of determination.</p>
--

<p><b>Comment:</b> Whilst the mix of affordable unit sizes is broadly acceptable, a different mix would be preferable and further discussion and agreement is required in respect of the size and tenure of units.</p>
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<p><b>Comment:</b> The indicative open market mix, whilst not part of this application, is not supported. A condition should be applied to any outline permission to ensure that the open market mix can be given proper consideration at the reserved matters stage.</p>
---

<p><b>Comment:</b> This advice is provided with regard to the current local planning policy framework, and not the emerging Joint Local Plan. Please note the emerging Joint Local Plan in respect of housing needs and design standards for space, accessibility, energy and water efficiency; which may be in use by the time this development comes forward.</p>
---

**2. Housing Need Information:**

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

2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. The Council's Choice Based Lettings system currently has 61

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applicants registered for affordable housing with a local connection to Needham Market, as of January 2022, with just over 600 applicants currently on the Housing Register with a connection to Mid Suffolk.

### 3. Preferred Mix for Affordable Housing

3.1 The applicant has proposed 100 affordable units, which is slightly in excess of the 35% required under planning policy. The policy would be satisfied through the provision of 97 affordable homes, and legal advice should be sought in respect of including more than 35% at determination. The following mix of unit sizes is proposed:

Unit Type	Number
1-bed flat	9
2-bed flat	9
2-bed bungalow	10
2-bed house	6
3-bed house	30
4-bed house	31
<b>Total:</b>	5

3.2 The mix of unit sizes is broadly acceptable, although slight adjustments are proposed in the table below.

3.3 The following matters will need to be clarified in order to agree the affordable housing mix as part of the grant of any planning permission.

- (i) The number of occupants each unit is intended to accommodate. The following is recommended; 1-bed 2-person (1b2p), 2b4p, 3b5p and 4b7p.
- (ii) The tenure of each unit. The Council currently seeks 75% of affordable homes as Affordable Rents and 25% as Shared Ownership, however we need to be mindful of the emerging Joint Local Plan (which may be in force by the time of determination) and paragraph 65 of the NPPF (regarding 10% affordable home ownership).
- (iii) The floorspace (gross internal area) of each unit. The Council seeks the Nationally Described Space Standard.

3.4 Based on current practice and the applicant's proposal of 100 units, the following mix of affordable homes is proposed.

Tenure	Number of units	Bedrooms and Occupants	Minimum unit Size (GIA) (m2)	Type
Affordable Rent	8	1b2p	50	Flat / Maisonette <sup>1</sup>
(72 units total)	6	2b4p	70	Flat / Maisonette <sup>1</sup>
	8	2b4p	70	Bungalow

<sup>1</sup> Each unit with own front door and no communal areas.

	12	2b4p	79	House
	36	3b6p	102	House
	2	4b7p	115	House
Shared Ownership	4	2b4p	70	Flat / Maisonette <sup>1</sup>
(28 units total) <sup>2</sup>	2	2b4p	70	Bungalow
	7	2b4p	79	House
	14	3b5p	93	House
	1	4b7p	115	House

3.5 The eventual layout of the development will need to strike a balance between clustering for management purposes and integrating the affordable and market homes. This is a key issue which we will look for at Reserved Matters stage.

3.6 Clusters of more than 15 affordable dwellings are not acceptable and affordable housing must not be clustered in less desirable areas of the site. To aid management by the eventual RP, the flatted units should not be in blocks of more than six and should be distributed through the site.

3.7 The applicant will also need to ensure that the affordable homes are built to the same quality and designs as the market homes, ensuring a tenure-blind design.

3.8 A phasing plan will need to be agreed and secured, to ensure that affordable homes are delivered alongside market homes.

3.9 It will need to be confirmed that the eventual Registered Provider will not be subject to unreasonable ongoing costs for highway maintenance. On this basis, the preference of the Housing Authority would be for the entire road network to be delivered to an adoptable standard and the use of private drives to be minimised. Where private drives are needed, they should be delivered to a high (preferably adoptable) standard.

Ongoing highway maintenance costs are an issue in respect of affordability, with costs either being passed on to tenants / leaseholders or borne by the eventual RP. Development proposals which leave RPs or residents with high ongoing maintenance costs may struggle to find a provider willing to take the units on.

3.10 Other relevant information on the affordable housing is as follows:

- The affordable units must be promptly transferred to a Registered Provider, acceptable to the Housing Authority. Properties must be built to current Homes England and Nationally Described Space Standards 2015.

<sup>2</sup> With regard to paragraph 65 of the NPPF, which requires that 10% of the development be for affordable home ownership, as clarified in the July 2021 update.

- All ground floor flats to be installed with a level access shower rather than a bath. Development to meet Part M (4) category 2 of the Building Regulations would also be welcomed.
- The Council is to be granted 100% nomination rights to all the affordable units on initial lets and 100% thereafter.
- Adequate parking provision, cycle storage, bin storage and shed provision must be made for the affordable housing units.
- The Council will not support applications for grant funding to deliver these affordable homes.

#### 4. Open Market Mix

4.1 Whilst the open market mix is not part of this application, an indicative mix has been provided. **It is recommended that a condition be applied to any outline permission to ensure that the open market housing mix is given proper consideration as part of any Reserved Matters application.**

4.2 The key (extant) policies for considering this issue are Policy CS9 of the Mid Suffolk Core Strategy and H14 of the Mid Suffolk Local Plan (1998). The emerging Needham Market Neighbourhood Plan (policy NM1) and Joint Local Plan may also be relevant.

4.3 The SHMA (2019, part 2)<sup>i</sup> indicates the market housing requirements for the district as a whole. This may not represent a directly and specifically appropriate mix in the circumstances of a development, but it offers a guide as to how the development can provide an appropriate mix (in the context of CS9) and contribute to meeting overall needs.

4.4 The table below sets out what a development of 300 dwellings would look like if it mirrored the District need exactly. This can be considered as a starting point for determining the market mix, which needs to reflect the circumstances of the site.

<b>Size of home</b>	<b>Indicative Mix</b>	<b>District Need Split</b> <i>(based on 179 market dwellings)</i>	<b>Difference</b>
One bedroom	3	13	-10
Two bedrooms	30	62	-32
Three bedrooms	88	52	+36
Four or more bedrooms	58	52	+6

4.5 The mix proposed by the applicant deviates significantly from District needs in respect of the 1-, 2- and 3-bed units. As such this indicative mix is not supported; it is hoped that this will be rectified by the time of any reserved matters.

4.6 With regard to CS9, provision of additional smaller dwellings would also aid affordability. The proposal to include a number of bungalows is welcomed.

4.7 The applicant should be aware of the policy requirements in respect of housing standards in respect of the emerging Joint Local Plan.



**Appendix: Size of new owner-occupied accommodation required in Mid Suffolk over the next 18 years**

Source: Ipswich Strategic Housing Market Assessment Part 2 Partial Update (January 2019)

Table 4.4e (using the 2014-based projections)

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

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/21/06882	
<b>2</b>	<b>Date of Response</b>	23/12/2021	
<b>3</b>	<b>Responding Officer</b>	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around the site in order to carry out waste collections. Attached are the vehicle specifications for reference.</p> <div style="text-align: center;">         OLYMPUS - 8x4MS        Wide - Euro 6 - Smo     </div> <p>Attached is the latest waste guidance for new developments.</p> <div style="text-align: center;">         SWP Waste Guidance        v.21.docx     </div> <p>The road surface and construction must be suitable for a 32tonne RCV to drive on.</p> <p>To provide scale drawing of site to ensure that access around the development is suitable for refuse collection vehicles.</p> <p>Please provide plans with each of the properties bin presentations points plotted, these should be at edge of the curtilage or at the end of private drive. These are required for approval.</p>	
<b>6</b>	<b>Amendments,</b>		

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



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

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

# Comments for Planning Application DC/21/06882

## Application Summary

Application Number: DC/21/06882

Address: Agricultural Land North Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279 No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Case Officer: Jasmine Whyard

## Customer Details

Name: Dr Caroline Cavill

Address: The British Horse Society, Abbey Park, Stareton,, Kenilworth CV8 2XZ

## Comment Details

Commenter Type: Amenity Group

Stance: Customer objects to the Planning Application

Comment Reasons:

- Increased Traffic/Highways Issues
- Other - give details

Comment:APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/21/06882

Erection of up to 279 No dwellings (including 100 affordable) (resubmission of DC/20/05046).

I am writing on behalf of the British Horse Society, the UK's largest equestrian Charity representing the country's 3 million horse riders. We object to this planning application.

Nationally, horse riders are limited to just 22% of the rights of way network, much of which is fragmented as a result of development such as this, resulting in increased traffic on once rural roads.

I bring your attention the reference within the Design and Access statement for "an emergency or 'secondary' access will be provided to the north of the site and leading onto Quinton Road."

The Indicative Masterplan document clearly words this as "Emergency access point with bollards or potential permanent access point".

This access point is onto a public bridleway. The bridleway is shown on the definitive map, and OS map, both named as 'The Drift'.

To have any access point from this development onto the bridleway will be dangerous to the equestrian users of the public right of way.

I bring to your attention that a previous application at this site (DC/20/05046) was refused, with the following cited:

"There is a single main access into the site along the southern boundary, which is inadequate to serve 279 dwellings and runs through an area at a high risk from pluvial and fluvial flooding. In the event of flooding there would be no means of suitable access in or out of the site. The development would be significantly affected by flooding and is thus contrary to Core Strategy policy CS4. The proposed emergency access onto The Drift (bridleway) north is wholly inappropriate for both irregular and regular or widespread use and would pose a danger to and discourage users of the bridleway. Notwithstanding its unsuitability, insufficient information has been submitted relating to the emergency access and the site location plan does not show how this access point connects onto the highway. Moreover, the bridleway would need to be upgraded to a byway in order to be used by vehicles, for which separate consent is required prior to determination and this has not been resolved."

This has not been addressed within the current planning application DC/21/06882

If the council is minded to approve this planning application, we ask that it seeks money from the developer via a Section 106 agreement for the improvement and enhancement of bridleways within a 2 mile radius of the site in consultation with Suffolk County Council Public Rights of Way and in a manner which is suitable for equestrian use, and within a specified timescale. In the event that this was made a condition of planning approval, we would be willing to lift our objection.

British Horse Society Access Officer East Region

# Consultee Comments for Planning Application DC/21/06882

## Application Summary

Application Number: DC/21/06882

Address: Agricultural Land North Of Barking Road Needham Market Suffolk

Proposal: Application for Outline Planning Permission (Access points to be considered, Appearance, Landscape, Layout and Scale to be reserved) Town and Country Planning Act 1990 - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).

Case Officer: Jasmine Whyard

## Consultee Details

Name: Mrs Linda Hoggarth

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

Email: Not Available

On Behalf Of: Mid Suffolk Disability Forum

## Comments

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

All dwellings should be visitable and meet Part M4(1), and at least 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2). It is our view that in housing developments of over 10 dwellings, at least one of the dwellings should be built to wheelchair standard Part M4(3).

It is also our view that 3% of the dwellings in housing developments of over 10 dwellings should be bungalows to assist people with mobility problems and to assist people who wish to downsize from larger dwellings.

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

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



# THE NEEDHAM MARKET SOCIETY

From the **Chairman**: Graham Oxenham, BSc(Eng), FCG  
68 Stowmarket Road, Needham Market, Suffolk IP6 8DX

To : Jasmine Whyard, MSDC & Babergh Planning

23 January 2022

cc Kevin Hunter, Town Clerk, NM Town Council

Dear Jasmine,

## **OBJECTION to DC/21/06882 - land off Barking Road, Needham Market**

We are extremely concerned at proposals to build 279 homes on open farmland, accessed solely from Barking Road near the doctor's surgery. The site plan appears to create an independent "new village" without facilities, abutting but not accessible directly to/from the town except predominantly by vehicle.

Arguments "against" are already well-rehearsed in the previously-refused Outline application DC/20/05046, and we note the current Outline application makes little change to previous objections. We wholly endorse the response of Suffolk Preservation Society in their letter of 10 January 2022, and the points raised in a local resident objection (your ref 7916267) of the same date.

We are not against development *per se*, as we understand the nation's need for proper housing for our growing population. But we *are* against wanton expansion without *pre*-planning & building of necessary infrastructure to create a thriving community for the future.

### *Conservation area*

Needham Market was primarily a medieval "linear" village with its core along the High Street. To the north & east, it was bounded by the river (and subsequent railway), and the south & west was open farmland. Both allow residents to walk quickly and easily into the open air & countryside.

### *Historical context of local population and housing*

The table below indicates a phenomenal growth of the town over the last 150 years. There was little growth until after WW2. In the 30 years from 1951 there were 855 new house builds, mostly expanding the south-west farm lands (Grinstead, Crowley & Chainhouse roads). The next 30 years from 1981 expanded the north-west farm lands (Hurstlea Road & offshoots, and Highlands) with 804 new builds.

Year	Houses	New	Pop'n	Density
<b>1871</b>	<b>319</b>	Builds	1,393	4.37
1951	464	145	1,493	3.22
1981	1,319	855	3,424	2.60
2011	2,123	804	4,528	2.13
<b>2022</b>	<b>2,753</b>	<b>630</b>	<i>under construction</i>	
<i>Planning</i>		279	off Barking Road	
<i>Planning</i>		600	off Barretts Lane	
<i>Projected</i>	<b>3,632</b>		<b>10,000?</b>	

The last 10 years is already seeing approx 630 new builds (some completed, including Jubilee Crescent) before the current application for 279 off Barking Road, and proposals for another 600 engulfing lands either side of Barretts Lane (as reported in the town's Newsletter, August 2021).



# THE NEEDHAM MARKET SOCIETY

From the **Chairman**: Graham Oxenham, BSc(Eng), FCG  
68 Stowmarket Road, Needham Market, Suffolk IP6 8DX

## *Neighbourhood Plans*

It seems current "planning" for the town is based on the 1971 Policy Statement prepared by East Suffolk County Council, precursor to MSDC. This categorised the river Gipping corridor with Needham Market as a dormitory "B" settlement, and therefore not worthy of infrastructure improvement, and neighbouring "A" settlements (Ipswich & Stowmarket) which had pre-planned infrastructure (for example: strategic roads, area secondary schools, "out-of-town" shopping centres).

Following the Localism Act 2011, the town has made several attempts to draft its Neighbourhood Plan to align with MSDC's current strategic plans. We are to have a local Referendum under that Act on 24 February 2022 to adopt the Referendum Draft (town plan 2020-2037). As local ratepayers, we would be concerned that our Neighbourhood Plan would have to be re-drafted *again*, and still not have precedence.

We note that the current Outline application for land off Barking Road (& Barretts Lane) is *not* within either plan as sustainable for development, and that the 279 (& 600) homes do *not* figure within MSDC's current 9%+ land bank (with 5% minimum required). Therefore, MSDC has already identified their immediate home-build requirement, without this current Outline application.

## *Creating a "new town"*

Needham Market, already the 2nd largest town in mid-Suffolk, is currently a "building site". This includes the Chalk Pit site, the former Middle School, two sites at the former MSDC offices, Victoria Gardens behind the former Institute, various sites off Hill House Lane, and extending Stowmarket Road to Badley Bridge. Much development has necessarily involved site-access by radiating to/from the centre of the Conservation Area, for construction traffic and the resulting new residential & commercial/delivery traffic.

The town has expanded westwards since WW2 to the topographical limits of the Gipping valley ridge, beyond which is open country much-loved by local residents. This application for 279 houses, together with other proposals, will alter the "centre of gravity" of the modern "new town" and encroach on Barking itself, and such expansion will be very visible from the Barking side of the valley ridge. With no *pre*-planning of what an ultimate "new town" will encompass (with 10,000 population, or growth to 20,000?), we feel it will be too late to plan necessary infrastructure to ensure the town continues to have a healthy quality of life, for current & future residents.

## *Conclusion*

Associated with town growth is delivery of appropriate health & education provision - our surgery and primary school are already at saturation, before any new developments. Equally important are centralised open spaces to benefit the mental & physical health of local residents (as with any town or city).

It seems an appropriate moment to "pause" further major development sites, until our Neighbourhood Plan's strategic Vision of a sustainable "new town" is implemented, with required infrastructure and parks *pre*-planned prior to further major housing/population expansion.

Yours sincerely,

*Graham Ox*

Chairman



## **Emerging Local Policy**

The latest published figures for Mid Suffolk DC show that the authority can demonstrate 9.4 years housing land supply and accordingly the site is not being brought forward in the emerging joint local plan.

The emerging Needham Market Neighbourhood Plan also does not allocate this site, following a decision that further allocations for new development were not required given the high levels of outstanding commitment. The Neighbourhood Plan policies instead provide guidance for applications that come forward on the sites identified in the emerging local plan plus any windfall sites within the settlement boundary.

The applicant's LVIA highlights the 2018 Neighbourhood Plan AECOM feasibility study to determine the necessary quantum and potential location of housing required to fund a relief road to ease traffic congestion within the town. However, this indicated that approximately 1400 houses would be required to fund a new road, far in excess of the current proposals. Therefore, whilst the Neighbourhood Plan acknowledges that future strategic growth to the west of the Town may occur, this will be to support a future aspiration. The Plan does not currently include policies to take this forward and a strategic masterplanning approach rather than piece-meal development would be vital to secure benefits for Needham Market. We note that the applicant's Planning Statement suggests that little weight should be given to the Neighbourhood Plan. However, it is now at an advanced stage, having been through Examination in May 2021. Section 70 of the 1990 Act requires an authority to have regard to post-examination draft Neighbourhood Plans and the Plan should therefore be accorded significant weight in the planning balance.

SPS therefore considers that allowing this significant development on this countryside site will cause harmful landscape impacts, and undermine both the immediate objectives of the Neighbourhood Plan and potential longer-term aspirations of the town. The application should therefore be refused.

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

Yours sincerely,

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

Cc: Needham Market Town Council  
Ward Councillors  
Needham Market Society



**From:** Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>

**Sent:** 19 Jan 2022 03:24:25

**To:**

**Cc:**

**Subject:** FW: DC/21/06882 - Consultation Responses

**Attachments:**

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**From:** Magnus Magnusson <magnus@parkerplanningservices.co.uk>

**Sent:** 11 January 2022 17:40

**To:** Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>; Jason Parker <jason@parkerplanningservices.co.uk>

**Subject:** DC/21/06882 - Consultation Responses

Dear Jasmine,

Please find below our response to comments received from your statutory and non-statutory consultees and in respect of our planning application pertaining to land north of Barking Road, Needham Market (MSDC Ref. DC/21/06882):

**Matters to be addressed prior to determination:**

- **Chris Ward, Active Travel Officer, SCC**, dated 23/12/21 - We have contacted Chris under a separate cover explaining that we would be happy for a planning condition to be imposed in relation to the requirement for submission of a travel plan. This Travel Plan can be submitted for approval ahead of submission of the reserved matters (RM) application.
- **Neil McManus, Development Contributions Manager, SCC**, dated 23/12/21 – We will be meeting Neil ‘virtually’ tomorrow to discuss his requirements and with a view to SCC removing their ‘holding objection’. We will of course let you know the outcomes of any meeting(s) we have with Neil and/or his team. Given the current application is in outline form, provision can be made for any on-site infrastructure requirements in respect of the layout plan(s) and at the RM stage. Our client is amenable to the imposition of (agreed) developer contributions and to be imposed via CIL and/or S106 mechanisms at the appropriate stage(s).
- **Jason Skilton, Flood & Water Engineer, SCC**, dated 29/12/21 – You will note that the LLFA has issued a ‘holding objection’. We are working with our own drainage consultants in respect of the ‘actions’ identified and will then engage with the LLFA with a view to the removal of their objection and prior to the determination of the application.
- **Ben Chester, Senior Transport Planning Engineer, Growth, Highways and Infrastructure**, dated 06/01/22 – Raised concerns in respect of application DC/20/05046 and considers that these have not been adequately addressed in the resubmission. SCC Highways recommendation therefore remains one of refusal. We are considering the comments raised by Suffolk CC Highways together with our transport consultants and will be responding to the matters raised in due course and ahead of determination.
- **Susan Lennard, Senior Environmental Protection Officer, Public Protection, BMSDC**, dated 10/01/22 – Reiterate requirement for a noise & light assessment as per their response to application DC/20/05046. We are considering the request for a noise & light assessment and will notify the LPA of our intentions in respect of this matter and in due course.

**Other:**

- **Tom Goodman, Business Officer, Historic England**, dated 22/12/21 – No comments and refers the case to the Council’s own specialist conservation and archaeological advisers.
- **Hannah Bridges, Waste Management Officer, MSDC** dated 23/12/21 – No objection subject to imposition of some standard conditions.
- **Water Officer, Suffolk Fire & Rescue**, dated 22/12/21 – No objection – A fire hydrant condition is recommended and there is further advice for the benefit of our client.
- **Mrs Linda Hoggarth, Mid Suffolk Disability Forum**, dated 30/12/21 – No objection – A series of recommendations are made by the forum for potential consideration at the RM stage.
- **Ellen Moore, Sustainable Development Officer, East Suffolk Drainage Board**, dated 04/01/22 – No objections – Comments contain some standard recommendations re. site drainage/discharge.
- **Dr Mash Maidrag, Public Health Consultant, Public Health & Communities, SCC**, dated 05/01/21 – No objection – Provides a series of recommendations for consideration at the RM stage. Comments are generally supportive in respect of the public health/community benefits associated with the proposal.

- **Dave Hughes, Public Realm Officer, BMSDC**, dated 05/01/22 – Refers to comments they made in respect of previous application DC/20/05046, i.e., no objections and there is considered to be generous areas of public open space within the development and opportunities to enhance these for recreational use and biodiversity.
- **Katherine Pannifer, Heritage Team, BMSDC**, dated 05.01/22 – Refers to comments provided in respect of previous application DC/20/05046, i.e., no objection.
- **Rachael Abraham, Senior Archaeological Officer, Conservation Team, SCC**, dated 06/01/22 – No objections subject to imposition of 2 x standard conditions.
- **Dr Caroline Cavill, The British Horse Society**, dated 07/01/22 – No objection subject to an appropriately worded condition securing a contribution towards improvement and enhancement of ‘local’ bridleways. As identified above, our client would be amenable to appropriate (agreed) contributions to be secured via section 106 and/or CIL.
- **Anglian Water, Pre-development Team**, dated 07/01/22 – No specific objections at this stage subject to imposition of conditions for discharge at the appropriate stage(s).
- **Peter Chisnall, Environmental Management Officer, BMSDC**, dated 10/01/22 – No objection subject to suggested conditions.
- **Public Rights of Way Team, Growth, Highways and Infrastructure, SCC**, dated 07/01/22 – ‘Largely accept’ proposal subject to S106 contributions to fund PROW infrastructure. Again, our client is agreeable in principle to appropriate and agreed developer contributions.
- **Nathan Pittam, Senior Environmental Management Officer, BMSDC**, dated 11/01/22 – No comments in respect of land contamination.
- **Bethany Philbedge, Suffolk Preservation Society**, dated 10/01/22 – Maintain objection to proposal.

I trust that the above is useful. We will be in touch shortly with further information and we trust that you will keep us up-to-date re. your intentions/time-scales for determination of this application,

Kind regards,

Magnus



Magnus Magnusson (MRTPI)  
 Planning Policy Specialist

☎ 01284 336119  
 ✉ [magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk)  
 🌐 [www.parkerplanningservices.co.uk](http://www.parkerplanningservices.co.uk)

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A Chartered  
 Town Planning &  
 Multi-disciplinary  
 Consultancy

25<sup>th</sup> January 2022

**Re: DC/21/06882 Application for Outline Planning Permission - Erection of up to 279No dwellings (including 100 affordable) (re-submission of DC/20/05046).  
Agricultural Land North Of Barking Road Needham Market Suffolk**

Dear Ms Whyard,

I am writing as ward member for Ringshall and Battisford to convey my own concerns and representations made by members of the public in my ward. Whilst I am not responding as a consultee on this planning application, the development would directly affect residents in Barking and in the locality.

**Objection:**

Residents in my ward are concerned of the impact on the character of what is a sensitive landscape between Needham Market and Barking, a mixture of deciduous woodland, agricultural land and hedgerow. There is a strong agreement between residents views and consultees advice on this issue. The Landscape Assessment (LUC, 2020) states that *“development of the site is likely to be perceived as an advancement into the undeveloped countryside”* and that the *“landscape makes a positive contribution to the rural setting an character of Needham Market”*. The Suffolk Preservation Society also commented that the *“landscape quality of the area is sensitive...”* and would be *“detrimentally altered through its development”*.

Many residents in Barking and Needham Market use the Causeway for leisure and exercise and to commute between the two settlements. The development of adjacent fields would diminish the natural value and feeling of open space that has benefited many residents in both normal times and during lockdown,.

The site would affect traffic movements through the village. Speed Indicator Device data from Barking demonstrates already high volumes of traffic and regular occurrences of speeding and it is felt that the development would increase traffic pressure. The B1078 between Barking and Needham is considered to be unsafe for pedestrians using a footway that is acknowledged by SCC Highways as being ‘a substandard width path’. With speeding traffic, the B1078 is also felt to be too dangerous for cycling.

Flooding is another large concern. There are often episodes of flooding on the B1078 that can seriously affect accessibility to the village from Needham Market. There are concerns that the development would add to surface runoff and exacerbate floods downstream in Barking. There is a lack of evidence to show that an area proposed for SuDs is sufficiently large. Flood risk both on the site and downstream of the site is not adequately quantified.

Other objections include:

Ecology – Place Services noted that surveys were completed in 2016 and are not up to date. There is insufficient information on protected species including dormice, bats and skylarks. The site is bordered by hedges in varying condition, deciduous woodland, and is within the locality of SSSI site Priestly and Swingens Woods.

Agricultural land - The site is situated on Grade 2 agricultural land, which means it is ‘very good quality agricultural land’.

Access – The proposal does not provide sufficient access onto the B1078 that is acceptable to Suffolk County Council's Highways Division.

Public Rights of Way – There is uncertainty of whether the emergency access at the north of the site would become a permanent access point for vehicles.

Planning – The application was rejected in 2021. Very little extra information is provided. The site is not present on the impending Needham Market Neighbourhood Plan or Joint Local Plan.

**From:** Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>

**Sent:** 14 Jan 2022 03:18:50

**To:**

**Cc:**

**Subject:** FW: DC/21/06882 - Revised TA

**Attachments:**

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**From:** Chris Ward <Chris.Ward@suffolk.gov.uk>

**Sent:** 12 January 2022 08:25

**To:** Ben Chester <Ben.Chester@suffolk.gov.uk>; Jasmine Whyard <Jasmine.Whyard@babberghmidsuffolk.gov.uk>

**Subject:** RE: DC/21/06882 - Revised TA

Hi Jasmine,

There are no updates from the Travel Plan perspective, so there will be no change in my comments either.

Kind regards

**Chris Ward**

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

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

Telephone: 01473 264970

Mobile: 07860 832202

email : [chris.ward@suffolk.gov.uk](mailto:chris.ward@suffolk.gov.uk)

web : [www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/](http://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/) & [www.thewaytosuffolk.org.uk](http://www.thewaytosuffolk.org.uk)



**THE WAY TO GO**

*Suffolk*



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**From:** Ben Chester <[Ben.Chester@suffolk.gov.uk](mailto:Ben.Chester@suffolk.gov.uk)>

**Sent:** 11 January 2022 19:07

**To:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>

**Cc:** Chris Ward <[Chris.Ward@suffolk.gov.uk](mailto:Chris.Ward@suffolk.gov.uk)>

**Subject:** RE: DC/21/06882 - Revised TA

Hi Jasmine,

Thanks, the content of the revised TA does not change anything in my response so I'm happy not to be reconsulted.

Kind Regards

**Ben Chester**

Senior Transport Planning Engineer

---

**From:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>

**Sent:** 11 January 2022 16:34

To: Ben Chester <[Ben.Chester@suffolk.gov.uk](mailto:Ben.Chester@suffolk.gov.uk)>; Chris Ward <[Chris.Ward@suffolk.gov.uk](mailto:Chris.Ward@suffolk.gov.uk)>

Subject: FW: DC/21/06882 - Revised TA

Hi both,

I received this earlier today, did either of you want to be formally reconulted on the attached?

Kind regards,

**Jasmine Whyard, BA (Hons), MSc**

Senior Planning Officer- Development Management

Sustainable Communities

**Babergh Mid Suffolk District Councils- Working Together**

Email: [jasmine.whyard@babberghmidsuffolk.gov.uk](mailto:jasmine.whyard@babberghmidsuffolk.gov.uk)

Tel: 01449724846 / 07547980983

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**From:** Magnus Magnusson <[magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk)>

**Sent:** 11 January 2022 11:53

**To:** Jasmine Whyard <[Jasmine.Whyard@babberghmidsuffolk.gov.uk](mailto:Jasmine.Whyard@babberghmidsuffolk.gov.uk)>

**Cc:** BMSDC Planning Area Team Blue <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>

**Subject:** FW: DC/21/06882 - Revised TA



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

Dear Jasmine,

Please see e-mail below and attachments in respect of our application,

Regards,

Magnus



Magnus Magnusson (MRTPI)

Planning Policy Specialist

01284 336119

[magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk)

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**From:** Magnus Magnusson

**Sent:** 11 January 2022 11:40

**To:** [planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)

**Subject:** DC/21/06882 - Revised TA

**Please forward to Case Officer Jasmine Whyard,**

Dear Jasmine,

Please find attached a revised Transport Assessment incorporating the up-to-date Accommodation Plan on p. 40 as submitted alongside our application (043-18-0300\_P5 - Needham Market -Accommodation Plan (003)). Please also find attached a list of submitted documents to date,

Kind regards,

Magnus