

Ref. No.	Details	Site and Applicant	Representations to the Planning Authority by the Town Clerk on behalf of the Town Council
DC/20/01036	<p>Application for Outline Planning Permission (Access to be considered)</p> <p>- Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure</p> <p>Reason(s) for re-consultation: Resending re consultation to allow for extra time due to Covid 19.</p>	Ashes Farm, Newton Road for St Philips Land Limited	<p>The Town Council reiterates the comments that it submitted previously on this application and opposes the grant of planning consent principally on highways and transport grounds.</p> <p>The Town Council acknowledges that that this site has been allocated for residential development. However, the Town Council also recognises the concerns that exist within the local community about the proposals. The proposed access from Newton Road to the site is felt to be wholly unsatisfactory because of its detrimental effect upon the amenity of local residents, implications for road safety along the B1115, the capacity of this minor road in being unable to cope with increasing traffic movements and its ability to provide appropriate access to a significant number of the proposed 300 new homes.</p> <p>In addition, doubts exist about the adequacy of drainage and sewerage services to cope with existing demand, irrespective of the new proposal to erect an additional 300 properties.</p>

Ref. No.	Details	Site and Applicant	Resolution
DC/20/01036	Erection of up to 300No. dwellings, new vehicular access, landscaping, open space and drainage infrastructure	Ashes Farm, Newton Road for St Philips Land Limited	<p>In view of the fact that proper consideration of the application is not possible at a public meeting under the current circumstances, the Town Council requests that a reasonable and extended timescale for consultation is permitted for this planning application. The Town Council recognises that that this site has been allocated for residential development. However, the Town Council also recognises and wishes to consider further, the concerns that exist within the local community about the access from Newton Road to the proposed site in terms of the detrimental effect upon the amenity of local residents, implications for road safety along the B1115, the capacity of this minor road to cope with increasing traffic movements and its ability to provide appropriate access to a significant number of the proposed 300 new homes.</p>

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

Sent: 11 Jun 2021 01:13:07

To:

Cc:

Subject: FW: DC/20/01036 Consultation Response

Attachments:

From: Planning EE <PlanningEE@highwaysengland.co.uk>

Sent: 11 June 2021 09:06

To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Cc: Spatial Planning <SpatialPlanning@highwaysengland.co.uk>; Hoque, Shamsul <Shamsul.Hoque@highwaysengland.co.uk>

Subject: DC/20/01036 Consultation Response



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 Sir/Madam,

Thank you for your consultation on the above planning application.

This current application (dated 28 May 2021) with amended master plan, we have reviewed the details and information provided. The amendments proposed to this planning application are unlikely to have an adverse effect upon the Strategic Road Network. There would be no change from our previous response dated 8 September 2020.

Consequently our previous recommendation of **No Objection** remains unchanged.

Regards

Shamsul Hoque (Dr), Assistant Spatial Planner
Spatial Planning Team
Operations (East) | Highways England
Woodlands | Manton Lane | Bedford | MK41 7LW
Contact phone: 0300 470 0743; mobile: 07850 907600
Web: www.highwaysengland.co.uk

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Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/20/01036

Referring to the planning application referenced above, dated 1 September 2020, Application for Outline Planning Permission (Access to be considered) - Erection of up to 300No dwellings, new vehicular access, landscaping, open space and drainage infrastructure. Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD. Notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Date: 8 September 2020	
Signature:	
Name: Mark Norman ppSimon Willison	Position: Spatial Planning Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
Mark.norman@highwaysengland.co.uk On Behalf of Simon Willison	

Annex A

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

This response represents our formal recommendations with regard DC/20/01036 and has been prepared by Simon Willison.

Consultants PJA have prepared a technical note dated 25th August 2020 in response to our previous set of comments. Our comments focused on a selection of topics, which are discussed in relation to PJA's technical note, as follows.

Traffic Counts

PJA has clarified that base traffic counts were recorded during school term time. We are therefore satisfied that these flows are suitable for use in the TA. No further action or comment is therefore required.

Assessment Year

PJA has presented growth factors for a 2036 forecast year which we requested in line with DfT Circular 02/2013. TEMPro has been used to calculate 2024-2036 AM and PM peak growth factors which have then been applied to the 2023 forecast flows

presented in the Transport Assessment, which in turn had been estimated from TEMPro. Whilst we have not been able to exactly replicate the 2024-2036 growth factors, we consider them to be broadly reasonable for use in the assessment. No further action or comment is therefore required.

Updated ARCADY models have been presented for the 2036 scenario which confirms that A14 Junction 50 will not be adversely impacted by the proposed development. No further action or comment is therefore required.

Lane Simulation

We had recommended that the entry lane simulation feature be used in ARCADY to account for any potential unequal lane usage at the junction. The results indicate that the junction is estimated to operate within capacity with the proposed development. No further action or comment is therefore required.

Committed Development

PJA has clarified that estimated traffic flow information for some of the committed developments was not presented in the TA because they did not cover the entire study area relevant to Ashes Farm. We are therefore satisfied that no further action or comment is required.

Mitigation

On the basis of PJA's additional assessment work and clarifications, we agree with the conclusion that no transport mitigation is required on or adjacent to the Strategic Road Network.

Based on the additional information supplied by PJA, we are now in a position to offer no objection to the planning application.



Historic England

Mr Bradley Heffer
Babergh Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582740

Our ref: **W:** P01185891

10 March 2020

Dear Mr Heffer

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

**ASHES FARM, NEWTON ROAD, STOWMARKE, T SUFFOLK, IP14 5AD
Application No. DC/20/01036**

Thank you for your letter of 10 March 2020 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

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

Yours sincerely

Sophie Cattier
Assistant Business Manager
E-mail: sophie.cattier@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





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

Our ref: AE/2020/125144/01-L01
Your ref: DC/20/01036
Date: 15 May 2020

Dear Mr Heffer

APPLICATION FOR OUTLINE PLANNING PERMISSION (ACCESS TO BE CONSIDERED) - ERECTION OF UP TO 300 NO DWELLINGS, NEW VEHICULAR ACCESS, LANDSCAPING, OPEN SPACE AND DRAINAGE INFRASTRUCTURE.

ASHES FARM NEWTON ROAD STOWMARKET SUFFOLK IP14 5AD

Thank you for your consultation dated 10 March 2020. We have reviewed the application as submitted and have no objection to the proposal. We have included advice to the applicant relating to Environmental Permitting in our response below.

Environmental permit - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

The Stonham Watercourse is designated a statutory main river. For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

We trust this advice is useful.

Yours sincerely

Environment Agency
Cobham Road, Ipswich, Suffolk, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Mr Mark Macdonald
Planning Advisor

Direct dial 02084749980

Direct e-mail Mark.Macdonald@environment-agency.gov.uk

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: planning.apps@suffolk.nhs.uk

Your Ref: DC/20/01306
Our Ref: IESCCG/010422/STO

By Email Only:

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

22/04/2022

Dear Sir / Madam

Proposal: Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Location: Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

1.0 Introduction

- 1.1 Thank you for consulting Ipswich and East Suffolk Clinical Commissioning Group on the above planning application.
- 1.2 I refer to the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the health and social care system provision on behalf of Suffolk and North East Essex Integrated Care System.

2.0 Existing Healthcare Position Proximate to the Planning Application Site

- 2.1 The proposed development is likely to have an impact on the services of two GP practices. These GP practices do not have capacity for the additional growth resulting from this development.
- 2.2 In addition to a primary healthcare response, the proposed development is likely to have an impact on other health and social care system providers that have been consulted as part of this healthcare impact assessment. This incorporates responses from:
- East Suffolk & North East Essex Foundation Trust
 - Norfolk & Suffolk Foundation Trust (Mental Health)
 - East of England Ambulance Service NHS Trust
- 2.2 The proposed development will be likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health

catchment of the development. As the commissioner of primary care services, Ipswich and East Suffolk CCG would therefore expect these impacts to be fully assessed and mitigated.

3.0 Review of Planning Application

3.1 Ipswich and East Suffolk CCG acknowledges that the planning application includes a Planning Statement which suggests that a capital contribution may be required to mitigate against the healthcare impacts arising from the proposed development

3.2 A Healthcare Impact Assessment (HIA) has been prepared by Ipswich and East Suffolk CCG to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

4.0 Assessment of Development Impact on Existing Healthcare Provision

4.1 The existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 690 residents and subsequently increase demand upon existing constrained services.

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

Table 1: Summary position for primary healthcare services within 2km catchment (or closest to) the proposed development

Premises	Weighted List Size¹	NIA (m²)²	Capacity³	Spare Capacity (NIA m²)⁴
Stowhealth	19,077	1,487.70	21,696	180
Combs Ford Surgery	8,693	454.40	6,627	-142
Total	27,770	1,942	28,323	38

Notes:

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

4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

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

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

5.3 **Health & Wellbeing Statement**

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

Suffolk and North East Essex Integrated Care System, recognises and supports the role of planning to create healthy, inclusive communities and reduce health inequalities whilst supporting local strategies to improve health, social and cultural wellbeing for all aligned to the guidance in the NPPF section 91.

The way health and care is being delivered is evolving, partly due to advances in digital technology and workforce challenges. Infrastructure changes and funds received as a result of this development may incorporate not only extensions, refurbishments, reconfigurations or new buildings but will also look to address workforce issues, allow for future digital innovations and support initiatives that prevent poor health or improve health and wellbeing.

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

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

5.4 The development would give rise to a need for improvements to capacity, in line with emerging STP Estates Strategy; by way of refurbishment, reconfiguration, extension, or potential relocation for the benefit of the patients of the area of Stowmarket or through other solutions that address capacity and increased demand as outlined in 5.3 - Health & Wellbeing Statement. For this a proportion of the cost would need to be met by the developer.

5.5 Table 2 provides the Capital Cost Calculation of additional primary healthcare services arising from the development proposal.

Table 2: Capital Cost calculation of additional primary healthcare services arising from the development proposal

Premises	Additional Population Growth (300 dwellings) ⁵	Additional floorspace required to meet growth (m ²) ⁶	Spare Capacity (NIA) ⁷	Capital required to create additional floor space (£) ⁸
Stowhealth	345	23.65	180	£86,400.00
Combs Ford Surgery	345	23.65	-142	£86,400.00
Total	690	47.31	38	£172,800.00

Notes:

5. Calculated using the Ipswich Borough average household size of 2.3 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
6. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO). Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
7. Existing capacity within premises as shown in Table 1.
8. Based on standard m² cost multiplier for primary healthcare in the East Anglia Region from the BCIS Public Sector Q1 2020 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£3,652/m²), rounded to nearest £100.

5.6 A developer contribution will be required to mitigate the impacts of this proposal. Ipswich and East Suffolk CCG calculates the level of contribution required, in this instance to be **£172,800.00** Payment should be made before the development commences.

5.7 Ipswich and East Suffolk CCG therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 planning obligation.

6.0 Conclusions

6.1 In its capacity as the primary healthcare commissioner, Ipswich and East Suffolk CCG has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.

6.2 The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.

6.3 Assuming the above is considered in conjunction with the current application process, Ipswich and East Suffolk CCG would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.

6.4 The terms set out above are those that Ipswich and East Suffolk CCG deem appropriate having regard to the formulated needs arising from the development.

6.5 Ipswich and East Suffolk CCG is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.

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

Yours faithfully

Jane Taylor
Senior Estates Development Manager
Ipswich and East Suffolk Clinical Commissioning Group



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

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

Your Ref: DC/20/01036

Our Ref: IESCCG/000320/STO

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

25/03/2020

Dear Sirs,

Proposal: Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Location: Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

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

Background

2. The proposal comprises a development of up to 300 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. The CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

In addition to a primary healthcare response, the proposed development is likely to have an impact on other health and social care system providers that have been consulted as part of this healthcare impact assessment. Due to the **COVID-19** epidemic responses from these Trusts will not be available immediately but it is requested that these responses are presumed in place until the time when an actual response can be made. This incorporates responses from:

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

Review of Planning Application

High quality care for all, now and for future generations

3. There is one GP practices within a 2km radius of the proposed development, This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Special consideration is requested as the NIA provided is not a true reflection of the space utilised and is in fact misleading as to the actual space the surgery has available to them. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Needs Arising From the Proposed Development

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

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

Health & Wellbeing Statement

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

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

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

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

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

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Stowhealth	18,532	1487.70	21,696	217
Total	18,532	1487.70	21,696	217

Notes:

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

5. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Stowhealth, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
6. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

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

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

Yours faithfully

Jane Taylor

Senior Estates Development Manager

Ipswich and East Suffolk Clinical Commissioning Group

Date: 16 March 2020
Our ref: 311762
Your ref: DC/20/01036



Mr Bradly Heffer
Mid Suffolk District Council
planningblue@babberghmidsuffolk.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
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Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Heffer

Planning consultation: Outline application for the erection of up to 300 dwellings with associated infrastructure.

Location: Ashes Farm, Newton Road, Stowmarket, Suffolk, IP14 5AD

Thank you for your consultation on the above dated 10 March 2020 which was received by Natural England on 10 March 2020

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

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

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

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

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

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

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

Yours sincerely

Heather Ivinson
Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. Our initial screening indicates that one or more Impact Risk Zones have been triggered by the proposed development, indicating that impacts to SSSIs are possible and further assessment is required. You should request sufficient information from the developer to assess the impacts likely to arise and consider any mitigation measures that may be necessary.

Biodiversity duty

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

Protected Species

Natural England has produced standing advice¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

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

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

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

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

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

Protected landscapes

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

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

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

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

Access and Recreation

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

where appropriate.

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

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

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

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

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

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



Planning Applications – Suggested Informative Statements and Conditions Report

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

AW Site Reference: 157049/1/0080282

Local Planning Authority: Mid Suffolk District

Site: Ashes Farm Newton Road Stowmarket
Suffolk IP14 5AD

Proposal: Application for Outline Planning Permission (Access to be considered) - Erection of up to 300No dwellings, new vehicular access, landscaping, open space and drainage infrastructure

Planning application: DC/20/01036

Prepared by: Pre-Development Team

Date: 17 March 2020

ASSETS

Section 1 - Assets Affected

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

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

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Stowmarket Water Recycling Centre which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

Section 3 - Used Water Network

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

Section 4 - Surface Water Disposal

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

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

Your Ref:DC/20/01036
Our Ref: SCC/CON/2749/20
Date: 22 July 2020
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Bradly Heffer

Dear Bradly,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/01036

PROPOSAL: Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Reason(s) for re-consultation: Agent response to consultee comment received by the Local Planning Authority on the 26th June 2020.

LOCATION: Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

ROAD CLASS:

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

COMMENTS

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

- The modelling results indicate in future year scenarios that Station Road / A1308 signalised junction is approaching capacity and A1120/Stowupland Road junction is exceeding capacity. The proposal is to introduce a roundabout at the A1120/Stowupland Road junction which mitigates the impact from this proposal. The Station Road/A1308 signalised junction mitigation proposal is not acceptable at present, but there are measures that can be considered such as timing and phasing changes that may improve the capacity here.
- The proposed visibility splays for the accesses are sufficient for the 85th%ile speeds.
- There is a single point of access for vehicles. Although we prefer 2 points of entry on a site this size, we will accept an improved wider access point and designed to distributor road standard; minimum width 7.0m. This allows an emergency vehicle to pass any obstruction.
- There is a proposal to extend the 30mph speed limit north to improve compliance with the limit for safety reasons associated with the development as more pedestrian activity is expected.

- The plans show new footways from the site access and improvements to some of the existing footways on Newton Road. There is insufficient highway land to improve the footway on B1115 north and south of Stowupland Road/Newton Road roundabout but there is safe route, although on a narrow footway, for the vulnerable user to gain access to the existing wider footway network.
- Other proposed mitigation is to construct formal parking laybys on Newton Road adjacent to the allotments.
- The catchment Primary School for pupils living in Newton Road is Chilton Community Primary School On Violet Hill Road which is approximately 1km from the centre of the site. This is considered to be within walking distance.
- The nearest bus stops to the site are located on Stowupland Road approximately 400m and the rail station is approximately 800m from the site's southern boundary which are considered within walking distance to catch public transport.
- There are records of 4 injury accidents on Stowupland Road, 2 on Newton Road, 4 at Station Road signals and one at A1120 junction with B1113. There is no pattern to suggest that highway layout or design were a contributory factor.
- The layout affects a number of Public Right of Way Footpaths and at present, these footpaths have not been indicated correctly. The footpath routes must either be accommodated and unobstructed through the development, or legally diverted. As this is an outline application, we recommend the applicant contacts the Definitive Maps team at SCC for more information regarding the legal alignment of FP01. Note, there is a fee for this service.

With the proposed mitigation and contributions for highway improvements, we consider the proposal would not have an adverse impact on the public highway with regard to congestion, safety or parking. Therefore, the County Council as Highways Authority, does not wish to restrict the grant of permission.

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

CONDITIONS

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

Access Condition: Before the development is commenced, details of the access and associated works, (including layout, levels, gradients, surfacing and means of surface water drainage) as outlined in Drawing No 3830-A-0101 P1, shall be submitted to and approved in writing by the Local Planning Authority.

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

Visibility Condition: Before the access into the site is first used, visibility splays shall be provided as shown on Drawing No. 3830-A-0101 P1 with an X dimension of 2.4 and a Y dimension of 90m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Highway Condition: Before occupation, the developer shall construct highway improvements including layby, a new footway and and improve the existing footway network as outlined on Drawing No. 383-A-0104 P1. Design and Construction details shall first be submitted to and approved by the Local Planning Authority.

Reason: To ensure that suitable footways are provided to access the application site and to connect the sites with adjacent footways and bus stops.

Highway Condition: Prior to commencement detailed design of the mitigation measures at A1120/B1113 junction are to be submitted and approved by the highway authority as detailed on Drawing No 3830-P-106. The approved scheme shall be laid out, constructed and made functionally available for use prior to occupation and thereafter retained in the approved form for the lifetime of the development.

Reason: To ensure that suitable highway improvements and mitigation measures are provided.

Travel Plan Condition: Prior to the occupation of any dwelling details of the travel arrangements to and from the site for residents of the dwellings, in the form of a Travel Plan in accordance with the mitigation measures identified in the submitted Framework Travel Plan shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority. Reason: In the interest of sustainable development as set out in the NPPF

Travel Pack Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. Reason: In the interest of sustainable development as set out in the NPPF

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

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

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

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

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

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

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

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

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

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

- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

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

NOTES

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. For further information go to <http://www.suffolkpublicrightsofway.org.uk> and www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk.

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. These works will need to be applied for and agreed with Suffolk County Council as the Local Highway Authority. Application form for minor works licence under Section 278 of the Highways Act 1980 can be found at the following webpage: www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/.

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

S106 CONTRIBUTIONS

The intension will be for the developer to enter into unilateral undertaking with SCC to create the Traffic Regulation Order (TRO) to extend the 30mph speed limit on Newton Road. The contribution required to carry the required works will be £10,000.

To ensure the Travel Plan is implemented, a contribution of £128,150 (£427.17 per dwelling) for Suffolk County Council to take on the implementation of the Travel Plan on behalf of the developer. This Travel Plan would be implemented in accordance with the Suffolk Travel Plan Guidance, that can be found at <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

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

Sent: 28 Jun 2021 09:44:32

To:

Cc:

Subject: FW: MSDC Planning Re-consultation Request - DC/20/01036

Attachments:

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

Sent: 25 June 2021 10:49

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

Cc: David Falk <david.falk@suffolk.gov.uk>; Kevin Verlander <Kevin.Verlander@suffolk.gov.uk>; Sam Trayton <Sam.Trayton@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@baberghmidsuffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>

Subject: RE: MSDC Planning Re-consultation Request - DC/20/01036

PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE

REF: Ashes Farm, Newton Road, Stowmarket – DC/20/01036

Thank you for your re-consultation concerning the above application.

As the Applicant has previously been notified, the proposed site does contain public rights of way (PROW): Footpath 6 and Footpath 8 Stowmarket. The Definitive Map for Stowmarket can be seen at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Stowmarket-1-of-2.pdf>. A more detailed plot of public rights of way can be provided and we would strongly advise the Applicant to contact DefinitiveMaps@suffolk.gov.uk for more information. Note, there is a fee for this service.

We are pleased to see that the Applicant has now clearly depicted FP6 and FP8 on their masterplan dated 16 June 2021, and we are therefore content to withdraw our objection. However the Applicant MUST still take the following into account:

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

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

2. **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.
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 discuss applying for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.

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 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

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

Thank you for taking the time to consider this response.

Public Rights of Way Team

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

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

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

Sent: 16 June 2021 16:56

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

Subject: MSDC Planning Re-consultation Request - DC/20/01036 *through

Please find attached planning re-consultation request letter relating to planning application - DC/20/01036 - Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

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

From: Chris Ward <Chris.Ward@suffolk.gov.uk>
Sent: 19 March 2020 09:53
To: Bradly Heffer <Bradly.Heffer@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/20/01036

Dear Bradly,

Thank you for consulting me about the proposed residential development off Newton Road in Stowmarket. I will be providing a response for the Travel Plan submitted and the other sustainable transport measures, however it will form part of the formal Suffolk County Council Highways response that Sam Harvey is leading on to comply with internal protocol.

Kind regards

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

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

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

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

From: planningblue@babberghmidsuffolk.gov.uk <planningblue@babberghmidsuffolk.gov.uk>
Sent: 10 March 2020 16:49
To: Chris Ward
Subject: MSDC Planning Consultation Request - DC/20/01036

Please find attached planning consultation request letter relating to planning application - DC/20/01036 - Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

Kind Regards

Planning Support Team

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Your ref: DC/20/01036/OUT
 Our ref: Stowmarket – Ashes Farm, Newton
 Road 60026
 Date: 05 May 2022
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

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

Dear Bradly,

Stowmarket: Ashes Farm, Newton Road – developer contributions

I refer to the proposal: application for outline planning permission (access to be considered) – erection of up to 300no. dwellings, new vehicular access, landscaping, open space, and drainage infrastructure.

An updated consultation response with revised infrastructure contributions was previously submitted to the local planning authority by way of letter dated 01 December 2021, which was time-limited to six months. Unless circumstances change, the response dated 01 December 2021 is still applicable for a further period to 30 November 2022.

Summary of infrastructure requirements based on 300no. dwellings:

S106	Education	
	- Primary school new build @ £20,508 per pupil place	£1,538,100
	- Secondary school expansion @ £23,775 per pupil place	£1,283,850
	- Sixth form expansion @ £23,775 per pupil place	£285,300
S106	Early years	
	- New build contribution @ £20,508 per pupil place	£553,716
	- Fully serviced land – freehold	£1
S106	Libraries improvements @ £216 per dwelling	£64,800
S106	Household waste @ £113 per dwelling	£33,900
S106	Monitoring fee per obligation trigger point	£412
S106	Highways	tbc

This application is part of the strategic allocation known as 'Stowmarket North – The Ashes'. As previously confirmed by the county council, there is a requirement to identify and secure fully serviced land of a minimum area of 0.1 hectares for a new early years

setting. The strategic allocation must be planned and delivered in a comprehensive manner – this is covered in the Stowmarket Area Action Plan (SAAP) [adopted 2013]. SAAP Policy 6.14 Development Briefs says,

A development brief will be produced before an application for planning permission is submitted. This development brief should follow the principles set out in paragraph 4.4 - 4.8 and take into account the Stowmarket Masterplan (where it is pertinent), the objectives and policies of the SAAP and other policies of the development plan.

This development proposal requires the securing of a land reservation for the new early years setting.

There are important issues in respect of highways and flood planning matters that need to be considered and planned in a comprehensive manner for The Ashes allocation.

Yours sincerely,

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

cc Luke Barber/Ben Chester, SCC (highways)
Kelly Smith, SCC (early years)
Jason Skilton, SCC (LLFA)
Vincent Pearce, BMSDC (planning)

Your ref: DC/20/01036/OUT
Our ref: 60026
Date: 1 December 2021
Enquiries to: Isabel Elder
Email: isabel.elder@suffolk.gov.uk

By e-mail only:

planninggreen@baberghmidsuffolk.gov.uk

FAO Bradley Heffer

Dear Bradley,

Re: Stowmarket: Ashes Farm, Newton Road – developer contributions

I refer to the proposal: Application for outline planning permission (access to be considered) – erection of up to 300 no. dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Further to my letter dated 9 June 2021, which was time limited to 6 months, I can confirm that the County Council has no amendments to make at this stage to our request.

SCC have previously set out requirements in a letter dated 14 September 2020 which was time-limited to six months and subsequent updated letter of 4 March 2021 with revised figures.

The figures below are valid for a further 6 months from the date of this letter.

This site is identified as a strategic site and therefore infrastructure contributions fall to S106 as it is currently zero rated in CIL terms:

S106		Total contribution	Per Dwelling
S106	Primary school new build @ £20,508 per place 75 pupils arising	£1,538,100.00	£5,127.00
S106	Secondary school expansion @ £23,775 per place 54 pupils arising	£1,283,850.00	£4,279.50
S106	Sixth form expansion @ £23,775 per place 12 pupils arising	£285,300.00	£951.00
S106	Early years land 0.1 ha	£1	
S106	Early years new build @ £20,508 per place 27 places arising	£553,716.00	£1,845.72
S106	Libraries improvements & books etc	£64,800.00	£216.00
S106	Waste Improvements	£33,900.00	£113.00
S106	Highways	tbc	

S106	Monitoring fee for each planning obligation trigger	£412	
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Yours sincerely,

Isabel

Isabel Elder
Developer Contributions
Growth, Highways & Infrastructure Directorate

cc SCC, Carol Barber
BMSDC Infrastructure Team

Your ref: DC/20/01036
 Our ref: 60026
 Date: 03 March 2021
 Enquiries to: Peter Freer
 Tel: 01473 264801
 Email: peter.freer@suffolk.gov.uk

By e-mail only:

planninggreen@babberghmidsuffolk.gov.uk

FAO Bradly Heffer

Dear Bradly,

Re: Stowmarket: Ashes Farm, Newton Road – developer contributions

I refer to the proposal: application for outline planning permission (access to be considered) – erection of up to 300 no. dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

This letter provides an update in respect of infrastructure requirements set out in SCC's previous letter dated 14 September 2020 which was time-limited to six months.

Updated summary of infrastructure requirements – This site is identified as a strategic site and therefore infrastructure contributions fall to CIL as it is currently zero rated in terms:

S106		Total contribution	Per Dwelling
S106	Primary school new build @ £20,508 per place 75 pupils arising	£1,538,100.00	£5,127.00
S106	Secondary school expansion @ £23,775 per place 54 pupils arising	£1,283,850.00	£4,279.50
S106	Sixth form expansion @ £23,775 per place 12 pupils arising	£285,300.00	£951.00
S106	Early years land 0.1 ha	£1	
S106	Early years new build @ £20,508 per place 27 places arising	£553,716.00	£1,845.72
S106	Libraries improvements & books etc	£64,800.00	£216.00
S106	Waste Improvements	£33,900.00	£113.00
S106	Highways	tbc	
S106	Monitoring fee for each planning obligation trigger	£412	

1. Education

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

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775/1.00) produces a total of £23,775 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, "further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place".

Contribution to new primary school at either Chilton Leys or Stowupland.

2. Pre-school provision

In paragraph 16 of the DfE guidance it says, "Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school".

A new Early Years setting is required on this site with a site area of 0.1ha and secured for £1.

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

Yours sincerely,

PJ Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Growth, Highways & Infrastructure Directorate

cc SCC, Carol Barber
BMSDC Infrastructure Team

Your ref: DC/20/01036
 Our ref: Stowmarket – Ashes Farm, Newton
 Road 60026
 Date: 11 September 2020
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

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

Dear Bradly,

Stowmarket: Ashes Farm, Newton Road – developer contributions

I refer to the proposal: application for outline planning permission (access to be considered) – erection of up to 300no. dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

This letter provides an update in respect of infrastructure requirements set out in my letter dated 12 March 2020 which was time-limited to six months.

Updated summary of infrastructure requirements:

S106	Education	
	- Primary school new build @ £20,508 per place	£1,538,100
	- Secondary school expansion @ £23,775 per place	£1,283,850
	- Sixth form expansion @ £23,775 per place	£285,300
S106	Early years land	£1
S106	Early years new build @ £20,508 per place	£553,716
S106	Libraries improvements & books etc.	£69,600
S106	Waste improvements	£33,000
S106	Highways	tbc
S106	Monitoring fee for each planning obligation trigger	£412

1. Education.

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

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775/1.00) produces a total of £23,775 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, *“further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place”*.

2. Pre-school provision.

In paragraph 16 of the DfE guidance it says, *“Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”*.

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

Yours sincerely,

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

cc Carol Barber, SCC (education)

Your ref: DC/20/01036
 Our ref: Stowmarket – Ashes Farm, Newton
 Road 60026
 Date: 12 March 2020
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

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

Dear Bradly,

Stowmarket: Ashes Farm, Newton Road – developer contributions

I refer to the proposal: application for outline planning permission (access to be considered) – erection of up to 300no. dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Summary of infrastructure requirements:

S106	Education	
	- Primary school new build	£1,470,825
	- Secondary school expansion	£1,227,852
	- Sixth form expansion	£272,856
S106	Early years land	£1
S106	Early years new build	£529,497
S106	Libraries improvements & books etc.	£69,600
S106	Waste improvements	£33,000
S106	Highways	tbc

Previous advice for the strategic allocation has been submitted to the local planning authority via letters sent December 2013, March 2016, April 2016, April 2017 and August 2018. However, it is disappointing that no pre-application advice has been sought in respect of this separate planning application. The NPPF in paragraphs 39 – 45 strongly encourages pre-application engagement and front-loading. 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.....”*.

This proposed development must be considered and planned comprehensively with the adjacent part of the strategic site allocation which is being separately promoted in order to secure a better plan-led outcome for the locality.

I set out below Suffolk County Council's infrastructure requirements associated with this development proposal which will need to be considered by the local planning authority. The county council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

The development falls within the Stowmarket Area Action Plan (SAAP) which was adopted in February 2013 and it therefore needs to be considered in relation to SAAP Policy 11.1 and Core Strategy Policy CS6 which requires all development to provide for the supporting infrastructure they necessitate. The site is identified as part of the allocation under SAAP Policy 6.13. Under SAAP Policy 6.14 Development Briefs it says, "*A development brief will be produced before an application for planning permission is submitted. This development brief should follow the principles set out in paragraph 4.4 – 4.8 and take into account the Stowmarket Masterplan (where it is pertinent), the objectives and policies of the SAAP and other policies of the development plan*". Ashes Farm Development Brief and Delivery Framework (November 2016) – The SAAP (2013) allocated 'The Ashes' for a mix of residential development and open space. In April 2016, following on from meetings with the landowners and their agents, the Council commissioned a team of consultants to facilitate discussions and prepare a delivery framework to identify and assess the constraints and develop viable solutions. The framework has provided options that will overcome the site constraints, increase the potential capacity and tested viability.

This proposal must take into account the cumulative impacts on infrastructure for the 'whole' strategic allocation of 'The Ashes' and be planned, designed & delivered in a comprehensive manner so as to achieve a well-designed place as set out in Chapter 12 of the NPPF, the Core Strategy, the SAAP, and the Ashes Farm Development Brief and Delivery Framework.

It is considered that the requirements of Suffolk County Council meet the legal tests set out in paragraph 56 of the National Planning Policy Framework and Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). The National Planning Policy Framework (NPPF) paragraph 56 sets out the requirements of planning obligations, which are that they must be:

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

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

Community Infrastructure Levy

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

However, this strategic site in Stowmarket will provide all the necessary infrastructure through planning obligations (and not the Community Infrastructure Levy) relating specifically to the development.

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’).

1. Education. Paragraph 94 of the NPPF states: *‘It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’*

Furthermore, the NPPF at paragraph 104 states: *‘Planning policies should:*

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

The Department for Education (DfE) publications *‘Education provision in garden communities’* [April 2019] and *‘Securing developer contributions for education’* [November 2019], which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 2019]. Paragraph 19 of the DfE guidance about securing developer contributions states, *“We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including both temporary and permanent education needs where relevant, such as school transport costs and temporary school provision before a permanent new school opens within a development site”.*

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

The most recent scorecard is 2018 and the national average new build cost per pupil for primary schools is £19,611. The most recent (March 2019) BCIS location factor for the

East of England, which includes Suffolk, is 100. When applied to the national new build cost (£19,611 x 1.00) produces a total of £19,611 per pupil for new build primary schools.

The most recent scorecard is 2018 and the national average expansion build cost per pupil for secondary schools is £22,738. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national expansion build cost (£22,738 x 1.00) produces a total of £22,738 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, *“further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place”*.

Pupil yields

SCC would anticipate the following **minimum** pupil yields from a development of 300 dwellings, namely:

- a) Primary school age range, 5-11: 75 pupils. Cost per place is £19,611 (2019/20 costs). A financial contribution towards the delivery of new primary school provision at either the Chilton Leys strategic allocation or in Stowupland.
- b) Secondary school age range, 11-16: 54 pupils. Cost per place is £22,738 (2019/20 costs). A financial contribution towards the expansion, improvement and enhancement of secondary schools serving the development.
- c) Secondary school age range, 16+: 12 pupils. Costs per place is £22,738 (2019/20 costs). A financial contribution towards the expansion, improvement and enhancement of sixth form provision serving the development.

Primary education build costs

- £19,611 per pupil for new build primary schools.
- It is anticipated that 75 primary age-pupils will arise. Total contribution sought is 75 pupils x £19,611 per pupil place = £1,470,825 (2019/20 costs).
- Building Bulletin 103 published by the Department for Education and the Education Funding Agency in June 2014 – this document aims to assist architects, sponsors and those involved in creating a design brief for new school buildings.
- All contributions increased in line with the BCIS index.
- Contributions held for a minimum period of 10 years from the date of first occupation of the final dwelling.
- Payment trigger points: 5% prior to commencement, 20% prior to the 1st dwelling occupation, 35% prior to the 100th dwelling occupation & 40% prior to the 200th dwelling occupation.

School transport costs

- An assessment of safe walking and cycling routes must be carried out by the applicant. The presumption is that all pupils arising from this proposed development will be able to access schools within safe walking distance which will minimise the length and number of journeys.

- Transport cost per pupil per annum is currently estimated at £960.

Secondary education and sixth form build costs

- £22,738 per pupil for permanent expansion of secondary schools.
- It is anticipated that 54 secondary age-pupils and 12 sixth form pupils will arise. Total contribution sought is 66 pupils x £22,738 per pupil place = £1,500,708 (2019/20 costs).
- Building Bulletin 103 published by the Department for Education and the Education Funding Agency in June 2014 – this document aims to assist architects, sponsors and those involved in creating a design brief for new school buildings.
- All contributions increased in line with the BCIS index.
- Contributions held for a minimum period of 15 years from the date of first occupation of the final dwelling.
- Payment trigger points: 5% prior to commencement, 20% prior to the 1st dwelling occupation, 35% prior to the 100th dwelling occupation & 40% prior to the 200th dwelling occupation.

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

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

From these development proposals SCC would anticipate up to 45 pre-school children arising, which is equivalent to 27 FTE pre-school children (one FTE is based on a place used for 30 hours per week).

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

In paragraph 16 of the DfE guidance it says, “Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”.

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

Early years land requirements

- A fully serviced site – minimum site area of 0.1 hectares. Suitable location to be identified and agreed at the reserved matters stage.
- Land transfer trigger point – option to transfer to SCC prior to the 50th dwelling occupation. Unencumbered freehold for £1.

Early years settings build costs

- £19,611 per child for new build early years setting.
- It is anticipated that 27 early years children will arise. Total contribution sought is 27 pupils x £19,611 per pupil place = £529,497 (2019/20 costs).
- All contributions increased in line with the BCIS index.
- Contributions held for a minimum period of 10 years from the date of first occupation of the final dwelling.
- Payment trigger points: 5% prior to commencement, 20% prior to the 1st dwelling occupation, 35% prior to the 100th dwelling occupation & 40% prior to the 200th dwelling occupation.

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’.

An 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. This is being coordinated by Suffolk County Council FAO Luke Barber and Samantha Harvey, and a separate consultation response will be sent.

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 Chapter 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 contribution of £216 per dwelling is sought i.e. £64,800. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

There is a project identified to improve the Stowmarket Library. This development will place additional demands on the library service, so a contribution of up to £216 per dwelling is sought to help fund this project.

In addition, each house is expected to generate the need for 2.8 library items per annum (Suffolk standard level of stock per 1000 population is 1,174, CIPFA Library Survey 2015). The average cost of library stock in Suffolk is £5.66 per item. This includes books and physical non-book items, like spoken word and music CDs, and DVDs, as well as daily newspapers and periodicals. This gives a cost per dwelling of $2.8 \text{ items} \times £5.66 = £16$ per dwelling. This scheme would therefore support a contribution of $300 \text{ dwellings} \times £16 \text{ per dwelling} = £4,800$.

- 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.*

The Developers Guide sets out the approach to securing developer contributions for waste. The County Council, as Waste Disposal Authority, is pursuing a strategy of reducing reliance on landfill and moving towards alternative methods of disposal, but with the emphasis on waste minimisation and recycling. In terms of the disposal of municipal residual waste the county council has Energy from Waste (EfW) facility serving Suffolk. To meet targets for reducing the land filling of biodegradable municipal waste under Article 5(2) of the EC Landfill Directive, the EfW facility is the main means of disposal. However, an important part of this overall strategy is encouraging residents to minimise and recycle waste arisings to reduce the need for collection and disposal.

Household Waste and Recycling Centre – Old Bury Road, Stowmarket IP14 1JQ: Already at capacity and significantly challenged. Current issues are:

- Footprint (m²) is small for number of visitors and tonnages received
 - Restricted parking space for visitors to utilise and access all recyclables containers
 - Restricted number of containers on site
 - No available space to add material streams to recycle or add reuse facility
- Traffic queuing at busy times due to challenging access arrangements
 - Access off the highway is from one way only
- Complaints regarding queues and noise
- No available land around current site to expand
- Site closes for safety reasons when containers are exchanged

SCC has a project underway to identify a new HWRC site for the Stowmarket catchment area. Likely cost of a new HWRC is between £3m and £5m. This is a priority site in the Waste Infrastructure Strategy and it is hoped that budget will be identified for this purpose. However, the Waste Service would expect a s106 contribution of £110 per household from any significant development in this area. In this case a sum in the region of £33,000 would be applicable.

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

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

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

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

- a) *take account of advice from the lead local flood authority;*
- b) *have appropriate proposed minimum operational standards;*

- c) *have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d) *where possible, provide multifunctional benefits.'*

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

Suffolk County Council FAO Jason Skilton will coordinate a consultation response.

- 9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.
- 10. Archaeology.** This will be coordinated by Dr Abby Antrobus, of the Suffolk Archaeological Service.
- 11. 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 native plants to attract & support insects, reptiles, birds & mammals. Refer to the MHCLG guidance on the Natural environment [updated 21 July 2019].
- 12. Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.
- 13. Superfast broadband.** This should be considered as part of the requirements of the NPPF Section 10 '*Supporting high quality communication*'. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and 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.
- 14. Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs associated with work on a S106A, whether or not the matter proceeds to completion.

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

16. 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 – Strategic Development

cc Carol Barber, Suffolk County Council
Luke Barber/Samantha Harvey, Suffolk County Council
Floods Planning, Suffolk County Council
Suffolk Archaeological Service

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

Sent: 15 July 2020 07:44

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

Cc: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>

Subject: 2020-07-15 JS Reply Ashes Farm, Newton Road, Stowmarket, IP14 5AD Ref DC/20/01036

Dear Bradley Heffer,

Subject: Ashes Farm, Newton Road, Stowmarket, IP14 5AD Ref DC/20/01036

Suffolk County Council, Flood and Water Management have reviewed application ref DC/20/01036

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

- Flood Risk Assessment and Drainage Strategy Ref AAC5491 Rev 6
- Masterplan Ref AAC5491A-rps-xx-xx-dr-a-0001
- Consultants Reply to LLFA Holding Objection Ref AAC5491 dated 29th June 2020
- Land Title Deeds

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
 - g. Details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site;
 - h. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction

(including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

- i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 1. Temporary drainage systems
 2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 3. Measures for managing any on or offsite flood risk associated with construction
- i. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The scheme shall be fully implemented as approved.

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

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

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

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

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

Informatives

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

Kind Regards

Jason Skilton
Flood & Water Engineer
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 <planningblue@baberghmidsuffolk.gov.uk>

Sent: 13 July 2020 14:46

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

Subject: MSDC Planning Re-consultation Request - DC/20/01036

Please find attached planning re-consultation request letter relating to planning application - DC/20/01036 - Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

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.

Growth, Highways and Infrastructure
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

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

Enquiries to: Kate Batt
Direct Line: 01284 741227
Email: kate.batt@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2020_01036
Date: 12/03/20

For the Attention of Bradley Heffer

Dear Mr Isbell

Planning Application DC/20/01036/OUT – Ashes Farm Newton Road Stowmarket Suffolk IP14 5AD: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. Substantial evidence, particularly for archaeology of Iron Age and Roman date is recorded from archaeological investigations undertaken in association with previous phases of development in a similar topographic position to the south east of the proposed development. This potential is discussed in the Archaeological Desk-Based Assessment, submitted with the application.

There is high potential for the discovery of below-ground heritage assets with archaeological interest within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

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

In this case the following three conditions would be appropriate:

1. Prior to the commencement of development within any Phase of the area indicated [the Whole Site], a programme of archaeological evaluation will be completed for that Phase, in accordance with a Written Scheme of Investigation for Archaeological Evaluation, which has been submitted to and approved in writing by the Local Planning Authority.

2. No development shall take place in any Phase of the area indicated [the Whole Site] until a programme of archaeological work, informed by the results of the approved programme of archaeological evaluation for that Phase, has been implemented in that Phase, in accordance with a Written Scheme of Investigation for Archaeological Mitigation approved in writing by the Local Planning Authority.

Each 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.

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

REASON:

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

INFORMATIVE:

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

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

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

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

Yours sincerely,

Kate Batt BSc (hons)

Senior Archaeological Officer
Conservation Team

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

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

Your Ref:
Our Ref: FS/F221482
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 27/03/2020

Dear Sirs

Ashes Farm, Newton Road, Stowmarket IP14 5AD
Planning Application No: DC/20/01036/OUT
Hydrants are required for this development
(see our required conditions)

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Sprinklers Advised

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

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

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: angela.smedley@fishergerman.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: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 27 March 2020

Planning Ref: DC/20/01036/OUT

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Ashes Farm, Newton Road, Stowmarket IP14 5AD
DESCRIPTION: 300 dwellings
HYDRANTS REQUIRED

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

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

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

OFFICIAL



SUFFOLK CONSTABULARY

Secured by Design



Jackie Norton
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street, Bury St Edmunds
Suffolk
Tel: 01284 774141
www.suffolk.police.uk

PLANNING APPLICATION: DC/20/01036 - Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure

LOCATION: Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

APPLICANT: St Phillips Land Ltd

PLANNING OFFICER: Mr Bradley Heffer

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

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

Dear Mr Heffer

Thank you for allowing me to provide an input for the above Planning Application which is to be built on formerly agricultural land I note that there is already a public footpath which is incorporated in the site near the northern boundary. I am aware that this application will relate to Zone 1 with 300 dwellings but that the total amount of dwellings will be 570 with a further 270 dwellings being developed later.

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

SECURE BY DESIGN (SBD)

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

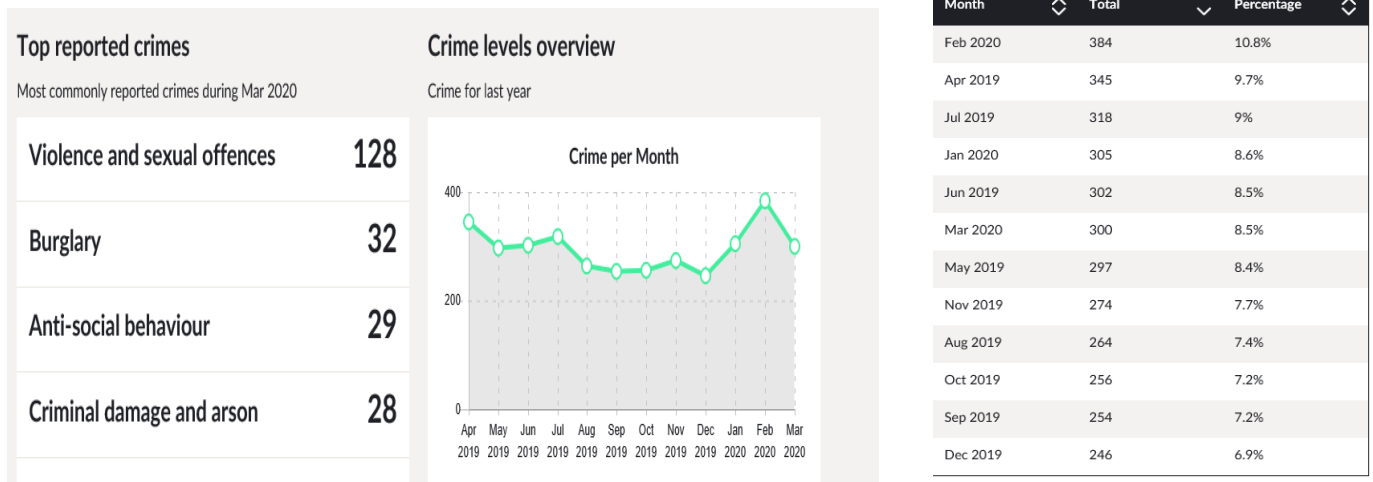
Working with the developer and planners at an early stage is crucial in ensuring that developments are designed to ensure security and safety for residents and to reduce crime levels through implementing Crime Prevention Through Environmental design and Secured by Design Principles.

The role of a Design Out Crime Officer within Suffolk Police is to assist in the design process in order to achieve this without creating a 'fortress environment'.

Secured by Design also offers a National Building Approval scheme **which may be of benefit to the developer.** Further details can be found in the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

NOT PROTECTIVELY MARKED
RESTRICTED/CONFIDENTIAL

CRIME STATS:



At this stage I do not have the level of detail required to make specific comments in relation to ‘designing out crime’ for this application. However, from the available plans viewed, Suffolk Police would like to register the following comments with regards to Section 17 of the Crime and Disorder Act and Crime Prevention Through Environmental Design and Secured by Design Principles.

However, from reviewing the DAS it is pleasing to see in 1.2 Objectives (page 4) that the developer aims to “*to deliver a high-quality development which is sustainable, **safe** and attractive. The Masterplan and DAS provide a high quality built and landscaped design which incorporates Best Practice principles.*” Also, on page 18 Section 2.12 Planning Policy highlights the National Planning Policy Framework and states that their aim is to “*create **safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;***” and also “*The development will demonstrate principles of good urban design to ensure that the site is **secure and safe.***”

These are all good key points to ensure Crime Prevention through Environmental Design (CPTED) in order to create a safer place for residents to live and to also reduce the demand on police.

From the documents viewed, Suffolk Police would like to provide CPTED guidance now so that these can be addressed before the next planning stage.

Primarily the concerns are around permeability and access to other residential areas, parking facilities/areas and the security of the current allotment site (Those are detailed below along with further general guidance):

GENERAL COMMENTS:

1. Long rear access paths: Where public open spaces have been designated there should be a number of properties that overlook these areas, it is also hoped that in order to maximise surveillance these properties will have active rooms looking onto these areas.

2. Permeability:

There is reference on page 20 2:13 Key Design Objectives around ease of access in that “***the proposals will link together the existing community facilities. Footpath links will be provided to connect existing footpath/cycleways to the proposed housing development, and the existing Public Right of Way will be retained within the development linking all areas of the development into the existing network.***”

Suffolk Police recognise that the balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for

those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars.

Where we cannot demand reductions in permeability without having evidence that this is the only option, we ask that the design of walkways, lighting, surveillance and the security of surrounding properties ensures that any permeability is as safe as it can be. It should ensure that the offender will stand out in a well-designed community.

It is therefore recommended that paths and cycle routes are kept to the minimum and where they are located they allow for some measure of slowing down a potential offender. Where a suggested footpath is unavoidable, such as a right of way, designers should consider making the footpath a focus of the development and ensure that they are straight as possible, preferably at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles with low growing and regularly maintained vegetation on either side or staggered railings could be incorporated in link paths to slow down any potential offenders.

If would assist that the area also be well lit, (SBD H2019 Sections 8.1-8.22 refers).

2.1 Footpaths should be designed to ensure that they are visually open, direct, well used and should not undermine defensible space areas, so that residents will feel safe to use them and enhance their feeling of safety to continue to use them.

Footpaths should not run to the rear of, and provide access to rear gardens, or dwellings as they are proven generators of crime. (SBDH 2019, Section 8.8-8.12 refers).

3. Allotments: From the point of view of reducing crime and allowing the allotment area to be more secure it is requested there is only one way in and out of the area. The area is to be securely gated and that the perimeter of the allotment area is enclosed, either with 1.5 m close board with 300 mm trellis topping or 1.8m fencing, which could be used with some form of thick defensive vegetation on the outside of the fencing area (chain link fencing is not recommended). (SBDH 2019, section 10.5 refers). It is also recommended that a secure building should be set aside for users to keep their tools and equipment in, such as an ISO shipping container. All allotment holders should be advised to mark tools and secure them after use; tools left lying around are often used by opportunist offenders, to commit further crime which could be in neighbouring residential areas.

4. Parking: The DAS Page 31, 4.4 Access and Accessibility states "*Parking has been considered within the proposals and arrangements have been explored to ensure that parked cars do not dominate the layout. Parking could be provided through a variety of solutions including small parking courts and within curtilage at the side or to the frontage of the dwelling and benefit from good surveillance.*"

It is acknowledged that further more in-depth details on parking will follow at the next Reserved Matters stage, however, it is recommended that all properties have garages and that they are not set back considerably, so allow extra parking. There should be NO REAR PARKING as this type of parking does not allow for surveillance to vehicles and can encourage ASB, criminal damage and graffiti and is not recommended within SBDH 2019 guidance.

Garages setback at the side of the property can allow an offender easier access to the rear of the property without been seen due to lack of surveillance to the area. Most burglaries are committed at the rear of the property. **(SBDH 2019, Section 16.1- 16.2 and 16.5-16.6 refers).**

5. Public open space: areas should be fenced/railed off, or comprise wooden posts, this will assist in reducing antisocial behaviour from either parked vehicles, or any off-road motor biking. See SBDH 2019 Section 9.2- 9.3.2.

6. All dwellings should have doors and windows to PAS 24:2012 or 2016 standards, and dusk to dawn lighting, lockable gates and fencing to be 1.8 m high close board or 1.5 m with 300 mm trellis topping. (See SBDH 2019 Sections 10, 21, 22, and 25). Cycle storage should conform to Section 56 of SBDH 2019).

REFERRALS:

Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012)
Section 1, para 1.19.

Information: National legislation that directly relates to this application are:

Section 17 of the 'Crime and Disorder Act 1998' places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

Despite other legislative considerations within the planning process, there is no exemption from the requirement of Section 17 as above. Reasonable in this context should be seen as a requirement to listen to advice from the Police Service (as experts) in respect of criminal activity. They constantly deal with crime, disorder, anti-social acts and see on a daily basis, the potential for 'designing out crime'.

This rationale is further endorsed by the content of PINS 953.

National Planning Policy Framework.

Paragraph 91(b).

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.

Paragraph 127(f).

Planning policies and decisions should ensure that developments 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 users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

I would be pleased to work with the agent and/or the developer to ensure the proposed development incorporates the required elements. This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of crime.

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

Yours sincerely

Jackie Norton
Western Designing Out Crime Officer
Suffolk Constabulary
Raingate Street, Bury St Edmunds,
Suffolk, IP33 2AP

DATED: 11/05/2020

Planning Application – Strategic Planning Policy & Infrastructure Consultation Response

Planning Application Reference:	DC/20/01036
Site:	Ashes Farm, Newton Road, Stowmarket, Suffolk. IP14 5AD.
Proposal:	Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure
Prepared by:	
Date:	28/04/22

1. Background and Policy Context

This response updates the consultation response submitted by Infrastructure and Strategic Planning – Policy on 03/07/21 (Holding Objection)

The application site is part of long running land allocation dating back to the Core Strategy (2008). The policy context for the site comprises:

- NPPF
- Mid Suffolk’s Core Strategy (2008) (saved policies)
- Mid Suffolk’s Core Strategy Focused Review (2012) (saved policies)
- Mid Suffolk Local Plan (1998) (saved policies)
- Stowmarket Area Action Plan (2013) (saved policies)
- The Babergh and Mid Suffolk Joint Local Plan (November 2020) submitted for Examination in March 2021.

The application site is allocated within the Stowmarket Area Action Plan (SAAP) (6.13). In 2016, Mid Suffolk District Council commissioned the Ashes Farm Statement Development Brief and Delivery Framework:

<https://www.midsuffolk.gov.uk/assets/Planning-Policy/Ashes-Farm-Development-Brief-Delivery-Framework-02-11-16-reduced.pdf>. The Council commissioned this framework in 2015 to provide a collaborative process, working with the site owners (at that time) and their agents as well as the relevant infrastructure providers (including Suffolk County Council).

The Council instigated the site review and commissioned the framework as it was recognised that this is a key site, for which there were aspirations for delivery in one of the District’s main towns.

The allocated site had not come forward for a number of reasons. The main reasons however were down to the viability of the development of the site (as allocated in its entirety @400 dwellings in the Core Strategy (2008) and subsequently in the SAAP (2013)) and problems with resolving the technical issues of access and drainage over the two separate land ownerships.

The constraints were reviewed within the Delivery Framework (2016) to provide a realistic basis which would enable the site to come forward either as a combined or separate planning application(s). A key outcome of the review was recognition of the need to increase site capacity from 400 dwellings (SAAP, 2013, Policy 6.13) to c. 575 dwellings.

The Babergh and Mid Suffolk Joint Local Plan (BMS JLP) (Nov 2020), Policy LA035 allocates the site for 575 dwellings (with associated infrastructure). The policy criteria set out in LA035 include (I) that the development shall be expected to comply with the relevant policies of the Plan and the general development principles set out in the Ashes Farm Development Brief and Delivery Framework (November 2016). The other policy criteria relate site constraints (including [II] rights of way, [III] noise, [IV] ecology, [V] watercourse discharge, [VI] flood risk, [VII] mineral prior extraction rights) and infrastructure provision requirements (including [VIII – XI] highway matters, [XII – XIII] education, [XIV] healthcare and [XV] waste.

The proposal for 300 dwellings on the application area is consistent with the findings of the delivery framework and the JLP LA035, as the other part of the site has been assessed as having capacity to accommodate a further 275 dwellings (575 in total).

Application DC/20/01036 is for outline permission with access to be considered. Accordingly, the policy response shall be based on considering the principle of the proposal against the relevant policy framework.

It is noted other consultees have responded to the specific matters as set out in LA035 including (amongst other matters) rights of way, noise, ecology, heritage and landscape, flooding, water management and drainage as well as infrastructure contribution requirements.

2. Policy Considerations

The application site is allocated in both Adopted Development Plans and the submitted BMS JLP. In accordance with the NPPF para 48, it is considered that the Local Planning Authority may give limited weight to the BMS JLP (Nov 2020) and to the supporting evidence in the determination of this application. This includes, where relevant, Part 1 strategic policies, Part 2 delivery policies and Part 3 Place and Allocation Policies (specifically LA035) and have regard to the JLP evidence base as appropriate in the determination of the above application:

<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/JLP-Core-Document-Library-live.pdf>.

Draft JLP policy (LA035) for the site sets eleven site specific criteria related to: relevant policy, contributions to pre-school, primary and secondary education, design, layout, landscaping and settings. Public rights of way, watercourse and relevant mitigation measures, flood risk. Contributions to healthcare and waste recycling, transport assessment and impacts. Traffic calming and new footways.

The SAAP (2013) also allocates the site for growth known as 'The Ashes', which the case officer will need to assess as part of the application. Although the Development Brief and Delivery Framework, prepared by Ingleton Wood in November 2016 was

not formally adopted by the Council, a degree of weight can be applied to this document which has also helped inform the direction of the emerging JLP (in respect of this site).

The policy and infrastructure response as submitted on 22/05/2020 sets out a holding objection which recommended that at that time permission for the application be refused unless the points already put forward by the infrastructure providers are satisfactorily addressed, with particular emphasis for:

- A way forward to provide a new Early Years setting, to be secured within this proposed development site, or within the eastern section of the allocation site (LA035). This provision is essential and must be secured.
- Highways requirements are satisfied.
- All other infrastructure requirements are satisfactorily met and addressed through a satisfactory s106.

The above-mentioned mitigation was considered essential in ensuring that this proposed development enables sustainable growth, as without these, the infrastructure required would not be mitigated.

This position has been updated, and the holding objection is removed, following consideration of the consultation responses by SCC on Development Contributions dated 01/12/2020 and also SCC on Highways dated 29/07/2020.

Further the Policy and Infrastructure Response (22/05/2020) set out that the Local Planning Authority needs confidence that the remaining area of the site is sustainably deliverable in its entirety. It also needs confidence that if this site were to be delivered through this planning application that the proper connectivity and permeability of both parts of the site are planned for and delivered. The Design and Access Statement which is submitted as part of the application illustrates connectivity through the Avenue which would meet this concern.

Summary

This is a long running allocation where the principle of development on the site is supported. It is acknowledged that the number of homes proposed for the site in the SAAP policy is less, however through work undertaken by the Council in 2016 it was agreed that a higher level of development would be required to enable site delivery. This has subsequently been taken forward in the submitted JLP allocation LA035 and the application is consistent with the proposed level of development.

Stowmarket is a considered sustainable location and the application site would be capable of contributing to meeting housing need.

Consequently, the Strategic Planning and Infrastructure Team, remove the previously submitted holding objection (22/05/2020) and support the determination of this application.



15 June 2020

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

By email only

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

Application: DC/20/01036
Location: Ashes Farm Newton Road Stowmarket Suffolk IP14 5AD
Proposal: Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Dear Bradly,

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

No objection subject to ecological mitigation measures and enhancement measures

Summary

We have reviewed the Preliminary Ecological Appraisal, Bat Emergence Survey Report, Bat Activity Survey Report, GCN eDNA survey, Reptile Report, Breeding Bird Survey (December 2019), as well as the Ecology Note (May 2020) and the Bat Emergence Survey of Tree Group 8 Report (June 2020) provided by RPS Group Ltd on behalf of the applicant, relating to the likely impacts of development on Designated Sites, Protected and Priority Species & Habitats.

We note that further bat emergence surveys were carried out on the trees with moderate bat roost potential in 'group 8'. These further surveys indicated that the roosting features do not currently support roosting bats. As a result, we are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on designated sites, protected species and Priority Species / Habitats and, with appropriate mitigation measures secured, the development can be made acceptable.



The measures identified in the Preliminary Ecological Appraisal, Bat Emergence Survey Report, Bat Activity Survey Report, GCN eDNA survey, Reptile Report, Breeding Bird Survey (December 2019) and the Bat Emergence Survey of Tree Group 8 Report (June 2020) should be secured and implemented. However, we recommend that a Construction Environmental Management Plan (CEMP: Biodiversity) should be implemented for this application, to ensure measures are outlined and implemented to avoid any potential impacts to Protected and Priority Species during the construction phase.

We also have the following comments regarding the proposed development:

Protected Species – Bats:

A wildlife friendly lighting scheme will need to be provided for this application as recommended by Ecological Impact Assessment (CSA Environmental Ltd, September 2019). This will need to be secured as a condition of any consent to avoid impacts to foraging and commuting bat species. The lighting scheme must follow [Guidance Note 8 Bats and artificial lighting](#) (The Institute of Lighting Professionals & Bat Conservation Trust, 2018). Therefore, the professional ecologist must be consulted to advise on the reserved matters landscape scheme and inform the lighting strategy for this scheme. As a result, the following measures should be demonstrated to avoid impacts to bats for this application:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Environmentally Sensitive Zones should be established within the development, where lighting could potentially impact important foraging and commuting routes for bats.
- Warm White lights should be used near Environmentally Sensitive Zones, preferably at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- Light columns should be as short as possible, as light at a low level reduces the ecological impact. However, if taller columns (>8m) are required, the use of cowls, hoods, reflector skirts or shields should be used to prevent horizontal spill.
- Lux levels should be directed away from boundary edges and Environmentally Sensitive Zones. This should preferably demonstrate that the boundary features and Environmentally Sensitive Zones are not exposed to lighting levels of approximately 1 lux. This is necessary to ensure that light sensitive bat species, will not be affected by the development.

Priority Species - Skylarks:

We have reviewed the Ecology Note and the response by the applicant's ecologist in regard to the proposed Skylark Mitigation Strategy for this application and note that the applicant's ecologist agrees that there is insufficient available space to provide habitat to support Skylarks in the longer term on site and that a minor impact may be caused by the proposed development. However, they have argued that the potential additional benefits of the development outweigh the small-scale impact on Skylarks and therefore, based on the planning balance, no further measures should be required for this development.

We disagree with this approach as the LPA has a biodiversity duty under s.40 of the NERC Act to conserve this Priority Species. Therefore, as a minor impact is likely to be caused by the development, appropriate mitigation and compensation measures must be delivered off-site for this application.



As it is unlikely that suitable nearby agricultural land is available in the applicant's control, we recommend that the [Whirledge & Nott](#) and/or [Suffolk Wildlife Trust](#) are contacted to arrange the provision of the proportionate off-site compensation with landowners in Suffolk. The provision of the Skylark Plots will be secured via the provision of a legal agreement for a period of 10 years. This should be accompanied by a Skylark Mitigation Strategy, which indicates that four Skylark plots will be implemented following the methodology for the Agri-Environment Scheme option: '[AB4 Skylark Plots](#)'.

Biodiversity Enhancements:

We support the proposed reasonable biodiversity enhancements measures, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured as a condition of any consent.

Recommended conditions

The following conditions will enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

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

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

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal, Bat Emergence Survey Report, Bat Activity Survey Report, GCN eDNA survey, Reptile Report, Breeding Bird Survey (December 2019) and the Bat Emergence Survey of Tree Group 8 Report (June 2020), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

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

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

2. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.



The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*
- i) Containment, control and removal of any Invasive non-native species present on site.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended), the Badger Protection Act 1992 and s40 of the NERC Act 2006 (Priority habitats & species).

3. PRIOR TO COMMENCEMENT: SKYLARK MITIGATION STRATEGY

“A Skylark Mitigation Strategy shall be submitted to and approved by the local planning authority to compensate the loss of any Skylark territories. This shall include provision of the evidenced number of Skylark nest plots, to be secured by legal agreement or a condition of any consent, in nearby agricultural land, prior to commencement.

The content of the Skylark Mitigation Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed Skylark nest plots;*
- b) detailed methodology for the Skylark nest plots following Agri-Environment Scheme option: ‘AB4 Skylark Plots’;*
- c) locations of the Skylark plots by appropriate maps and/or plans;*
- d) persons responsible for implementing the compensation measure.*

The Skylark Mitigation Strategy shall be implemented in accordance with the approved details and all features shall be retained for a minimum period of 10 years.”

Reason: To allow the LPA to discharge its duties under the NERC Act 2006 (Priority habitats & species)



4. CONCURRENT WITH RESERVED MATTERS: BIODIVERSITY ENHANCEMENT STRATEGY

"A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."

Reason: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

5. CONCURRENT WITH RESERVED MATTERS: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

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

The content of the LEMP shall include the following:

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

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

Reason: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).



6. CONCURRENT WITH RESERVED MATTERS: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

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

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

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

7. TIME LIMIT ON DEVELOPMENT BEFORE FURTHER SURVEYS ARE REQUIRED

If the development hereby approved does not commence within 18 months from the date of the planning consent, the approved ecological mitigation measures secured through condition shall be reviewed and, where necessary, amended and updated.

The review shall be informed by further ecological surveys commissioned to:

- i. establish if there have been any changes in the presence and/or abundance of Protected Species and*
- ii. identify any likely new ecological impacts that might arise from any changes.*

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of the development.

Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

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



Please contact us with any queries.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)
Ecological Consultant
placeservicesecology@essex.gov.uk

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

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



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

13/07/2020

For the attention of: Bradly Heffer

Ref: DC/20/01036; Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

Thank you for re-consulting us on the Outline Planning application for the erection of up to 300No dwellings (Access to be considered), new vehicular access, landscaping, open space and drainage infrastructure.

As determined in the Stowmarket Area Action Plan (SAAP) (2013) and the emerging Joint Local Plan (Allocation LA035) the site has the potential to accommodate development. However, due to its edge of settlement location and sloping topography it is essential that the development has multi-functional green infrastructure and a layout that is sympathetic to its location and the existing community of Stowmarket.

Since our last consultation, a landscape strategy and revised viewpoint visualisations have been submitted. The Landscape and Visual Impact Assessment (LVIA) submitted follows the principles set out in the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) with viewpoints presented as panoramic visualisations. The assessment results have been reviewed, and although we agree with the results for many of the receptors, we have the following recommendations:

- The proposed development has been assessed as having a 'major adverse' effect on Viewpoint 6 (Users of the access road, residents and visitor's receptor), even after 15 years. It states "Character of the access road has changed from one of rural edge to suburban. There is likely to be limited space for landscape boundary planting between the new housing and the existing access road." Although we agree that this is true of the current proposal, the LVIA should act as a tool in assessing impacts, but also the layout and design of the proposed development. The narrative of this viewpoint assessment implies that the layout cannot be amended to reduce the impacts. However, we would insist the south eastern boundary of the development is amended to allow for landscape boundary planting to aid the mitigation of impacts on visual amenity.
- The effect on Viewpoint 9 and 10 (Pedestrians, cyclists and vehicular users) has been assessed as 'moderate adverse' after 15 years. Although additional tree planting on streets and public open space will help break-up the roofscape. We would also advise that consideration is given to roof colours, types and features (such as gables and chimneys) to ensure the roofscape is varied and provides visual interest.
- The assessment suggests that Viewpoint 12 effects will be reduced by introducing bunding, acoustic fencing and landscape screening. However, it is unclear both from the LVIA narrative and the Landscape Strategy (Dwg ref: AAC5491L-RPS-XX-EX-DR-L-9001 Rev. PO4) whether there we will be planting on both the north and south side of the bund/acoustic fencing. A section drawing across this area of the site would be a useful tool in understanding the approach taken

and whether improvements can be made. For instance, the landscape corridor could provide a great opportunity to create an additional recreational route for residents that links open spaces, as well as provide visual amenity and noise mitigation.

In addition to the matters raised above, if minded for approval we would recommend the following layout and design matters are considered:

- We would expect all residential plots to have appropriate private outdoor space and therefore this should be accounted for when designing the layout and plot arrangement:
 - i. Apartments should have private communal garden spaces or private amenity space such as balconies.
 - ii. Private outdoor space should be as far as possible usable rectangular garden shapes.
- Areas of lower density should have a looser grain with front gardens, varied alignment and mixed surface treatment.
- The use of parking courts should be avoided. If proposed they should be designed to provide adequate space for parking and access to properties whilst also providing suitable soft and hard landscaping that ensures the space is of high quality and in turn remains active.
- Proposed terrace arrangements normally lead to refuse/garden access being via long, convoluted routes. In these instances, it would be considered appropriate to provide refuse storage at the front of units in hidden or secluded arrangements such as projected porches on properties or access to the rear of properties via internal passageways (ginnels).
- SuDs should be incorporated within the built envelope. The inclusion of bioretention areas/rain gardens and/or swales on streets would be welcomed, as this would reduce the reliance on 'pipe to pond' and engineered solutions. Where attenuation areas are proposed, they should include soft-engineered outlets and inlets, as well as no fencing to ensure they are sympathetic to the local landscape character.
- Play spaces 'doorstep play' should be distributed across the site. Preferably all play spaces should be informal; utilising the landscape and natural play features, with little to no fencing requirements.

Please let me know if you have any queries.

Yours sincerely,

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

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

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



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

30/03/2020

For the attention of: Bradly Heffer

Ref: DC/20/01036; Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

Thank you for consulting us on the Outline Planning application for the erection of up to 300No dwellings (Access to be considered), new vehicular access, landscaping, open space and drainage infrastructure.

This letter sets out our initial consultation response focusing on the landscape impact of the proposal and how it relates and responds to the setting and context of the site. As part of the review, the Landscape and Visual Impact Assessment (LVIA) (Document ref AAC5491L): , Design and Access Statement (DAS) (Document ref: AAC5491A), Masterplan (Dwg ref: AAC5491A-RPS-xx-xx-DR-A-0001), Arboricultural Impact Assessment (Document ref: JKK10274) and Tree Removal and Protection Plans (Dwg ref: JKK10274_506_TP – 511_TP).

Recommendations

As determined in the Stowmarket Area Action Plan (SAAP) (2013) and the emerging Joint Local Plan (Allocation LA035) the site has the potential to accommodate a development of the density and nature proposed. However, due to its edge of settlement location and sloping topography it is essential that the development has multi-functional green infrastructure and a layout that is sympathetic to its location and the existing community of Stowmarket.

Policy 6.15 of the SAAP states that: *“Any future development on this site must address the:*

- 1. important visual nature of the area, and retain distant views to and from the site;*
- 2. need for appropriate structural landscaping and screening across the site;*
- 3. need to protect, or as a minimum soften, the impact of development on the skyline;*
- 4. provision of open space to the top of the site;*
- 5. land to the far west of the site, bounded by Newton Road, Spring Row and the A14, which is designated for open space uses;*
- 6. retention of existing hedgerows and mature trees;*
- 7. 'gateway' to Stowmarket on the Stowupland Road;*
- 8. part of the site within Flood Zone 3b;*
- 9. areas affected by flood risk must be of a use compatible with the NPPF Technical Guidance (page 6); and*
- 10. presence of Biodiversity Action Plan (BAP) habitats and species.”*

At present, based the information submitted, we are not satisfied that the Policy requirements have all been met, and therefore would place a **holding objection** on this application until the following information/documents have been provided:

- Due to the prominence of the site and its steep sloping nature, landscape treatment will play an important role in the development's layout and design. At present, the DAS gives minimal

landscape detail and is weak in other areas too. For instance, the 'character areas' are defined by the highway/street typologies and not the house types and treatment (i.e irregular/regular building lines). From a landscape perspective we would also expect trees on both sides of the 'main street' highway and Periodic tree placement on 'avenue/core streets'. To provide us with sufficient information, we would advise a landscape strategy is produced, which demonstrates how the proposal will mitigate visual and landscape impact, link with the surrounding movement network and be sympathetic to the existing Stowmarket settlement. Although many details can be defined at later planning application stages, the landscape principles need to be defined at this outline stage. The strategy should therefore include the following sections:

- a. Landscape masterplan – How will the landscape influence
 - b. Public open space (POS) – It's important to understand how the different POS will be treated and how they will differ in appearance and materiality.
 - c. Connectivity - how will pedestrians and cyclists be prioritised? The current masterplan framework shows some gaps with regards to connectivity. Given the adjacent parcel of land may also be developed, can a circular route be achieved on this site alone?
 - d. Boundary treatments – treatment to boundaries can inform character and setting and therefore principles should be set at the outset. Also, how will existing vegetation boundaries be utilised to inform layout and enhanced to mitigate landscape and visual impact?
 - e. Hard landscaping strategy – the surface treatment to footpaths, private drives and highways should be aligned with the character of the development.
 - f. SuDS strategy - Streets are not just corridors for movement. They are inherent to a settlements sense of place, identity and reflect its communities. Street designs therefore need to reflect this. Where possible, we should be looking to be innovative with our approach to water management and the integration of SuDS within the built envelope through the use of rain gardens and swales. SuDS can improve the quality and, in most cases, aesthetics of the public realm and developments by creating attractive and multi-functional landscape features. In addition to surface water attenuation and / or detention, well-designed SuDS features can provide education and amenity opportunities for local users.
 - g. Planting strategy - High quality planting along access roads, public spaces and in front gardens are key to creating a good first impression. Where possible (and especially outside private gardens) street trees should be proposed. A predominance of one species or variety should also be avoided in order to minimise the risk of widespread ecological disease throughout the area. Preference should be given to native trees and shrubs, but in certain urban and residential situations, better results might be achieved by the use of naturalised trees and shrubs, which would add wildlife value.
- The Landscape and Visual Impact Assessment submitted follows the principles set out in the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3). However, as suggested previously we ask that the viewpoint photographs are not spread across two pages to ensure an appropriate analysis of the assessment can be made. Instead, we would advise the images are presented with a single frame on an A3 sheet, providing an enlargement in the range 100-120%. This should then be accompanied by the panoramic imagery as a baseline/context only visualisation. Once these amendments have been undertaken, we will assess the findings of the LVIA.

Once the matters raised above have been addressed, we will be able to provide a detailed assessment of the application.

If you have any queries, please let me know.

Yours sincerely,

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

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

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



From: BMSDC Planning Area Team Pink <PlanningPink@baberghmidsuffolk.gov.uk>

Sent: 13 Jun 2022 03:49:26

To:

Cc:

Subject: FW: DC/20/01036 - Ashes Farm Stowmarket

Attachments:

From: David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>

Sent: 13 June 2022 15:04

To: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>

Subject: DC/20/01036 - Ashes Farm Stowmarket

Hi Brad

I have no objection in principle to this application subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report, an appropriate condition should be used for this purpose. Although a small number of trees are proposed for removal, they are generally of limited value and/or poor condition, so their loss will have negligible impact within the wider landscape. These removals can be offset with a suitable planting scheme in mitigation.

Please let me know if you require any further input.

Kind regards

David Pizzey FArborA

Arboricultural Officer

Tel: 01449 724555

david.pizzey@baberghmidsuffolk.gov.uk

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

Babergh and Mid Suffolk District Councils – Working Together

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Bradly Heffer, Development Management

FROM: Joanna Hart, Environmental Protection Team

DATE: 01.04.2020

YOUR REF: DC/20/1036

SUBJECT: Ashes Farm, Newton Road, STOWMARKET, Suffolk, IP14 5AD.
Application for Outline Planning Permission (Access to be considered) -
Erection of up to 300 No dwellings, new vehicular access, landscaping, open
space and drainage infrastructure.

Please find below my comments regarding noise/odour/light/smoke matters only.

Thank you for your consultation on the above application.

The site is close to the A14 and the Acoustic Design Statement (ADS) ('Acoustic Design Statement: Proposed residential development at Ashes Farm, Stowmarket', produced by RPS, dated 11.12.2019 – revision 2) submitted with the application, confirms that traffic noise from the A14 (and to a lesser extent railway noise) dominates the site. The existing noise levels on site are above those given in the World Health Organisation (WHO) Guideline Values for Community Noise and also BS8223:2014 Guidance on Sound Insulation and Noise Reduction in Buildings, meaning that attenuation will be needed to provide adequate internal and external noise levels.

In order to address this, a noise barrier, consisting of a 2m high earth bund, topped with a 2m high acoustic fence, is proposed. This is indicated on the masterplan drawing and also appears to be shown in figures 2 – 5 of the ADS, although I would appreciate if clarification sought as to whether the effect of the barrier has been included within the sound model, as shown on the above mentioned figures. The specification of the bund and barrier used for their calculations should also be provided as I would recommend that any specification should be secured by means of condition.

In terms of internal noise levels, table 4.1 specifies various acoustic glazing and ventilation packages which could be used to attain different levels of attenuation. Figure 5 shows which packages would be needed in each part the site. At this stage, house orientation and layout are not yet known and this will have an impact on the level of attenuation needed. The ADS recommends that '*dwellings are orientated such that facades of habitable rooms (living rooms, dining rooms and bedrooms) do not directly face the A14 and that external amenity areas are not located directly adjacent with the A14*'. In order for internal levels to be met, it is highly likely that residents will have to keep windows shut at all times, save for having the option to open them for purge ventilation. It is a planning decision as to whether this is acceptable.

In terms of external noise levels, the existing noise levels on the site are above the upper limit of 55dB,LAeq (to avoid serious annoyance). However, it is likely that buildings and fencing will provide shielding which will decrease these levels, it is recommended that external amenity areas are orientated s that they are screened from the A14.

Given the size of the site and its proximity to existing dwellings on Stowupland Road, I would suggest that a noise assessment to take into account the construction phase should be undertaken so as to ensure that these properties are properly protected from adverse impacts of noise, particularly if piling is proposed. This could be required either at this stage, or by means of enhancing the construction management plan condition I have suggested below.

The ADS does not consider any potential noise from Ashes Farm – I am unclear of the status of the farm, but I note that on the masterplan, the barns are coloured brown – however this shading does not appear in the key. If this is an operational farm then further detail should be provided at this stage on the type and scale of the operation and whether any mitigation is needed in order not to fetter those operations, nor adversely impact on proposed dwellings.

Notwithstanding the above comments, I would recommend that conditions be attached to any permission to the following effects, in order to protect amenity:

- The construction working hours (to include deliveries to /from site) in respect of any works undertaken for the development shall be limited to 08.00 – 18.00hrs Monday – Friday, 09.00 – 13hrs Saturday and at no time on Sundays.
 - No burning shall take place at any time during the site clearance/construction phases of the development.
 - Prior to any development commencing, a Construction and Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. Details required include:
 - o Details of operating and delivery hours
 - o Means of access
 - o Traffic routes
 - o Vehicle parking and manoeuvring areas (site operatives and visitors)
 - o Wheel washing facilities
 - o Hours of operation and vehicle movements
 - o Lighting,
 - o Location and nature of compounds and storage areas, including maximum heights
 - o Waste removal
 - o Temporary buildings and boundary treatments
 - o Dust management
 - o Noise and Vibration management to include identification of action levels and specific details for monitoring. If piling is proposed, then this should be specifically assessed.
 - o Litter management
 - o Risk assessment of potentially damaging construction activities
 - o Identification of "biodiversity protection zones"
 - o Responsible persons and lines of communication including complaint handling and responses to the Local Planning Authority
 - o Use of protective fences, exclusion barriers and warning signs
- The approved construction plan shall thereafter be implemented in respect of each phase and sub-phase (other than Phase 1) as approved and shall be adhered to during the construction of that phase or sub-phase.

- Prior to commencement of residential development of each phase, a scheme for acoustic glazing and ventilation (to meet the performance standards as outlined in sections 4.11 – 4.17 table 4,1 of the Acoustic Design statement) for each dwelling shall be submitted to and approved by the Local Planning Authority. The approved scheme shall be implemented in respect of each dwelling prior to the first occupation of that dwelling.
- Prior to the commencement of residential development in each phase a scheme for acoustic glazing including a scheme for testing shall be submitted to and approved in writing by the Local Planning Authority for that phase. Such details as may be agreed shall be implemented in respect of each dwelling prior to the first occupation of that dwelling and the testing shall be carried out in accordance with the approved details. Prior to the first occupation of any dwelling, a scheme of independent testing and certification for glazing performance standards so as to demonstrate that the scheme of glazing given in sections 4.11 – 4.17 and table 4.1 of the Acoustic Design Statement correctly installed and that internal design values as given in BS8233:2014 Guidance on sound insulation and noise reduction for buildings, or subsequent revision thereof are being met, shall be submitted to and agreed in writing by the Local Planning Authority. This shall include a phasing scheme to agree occupation of the site as glazing performance testing is undertaken and approved. The scheme shall be implemented as approved.
- Concurrent with the submission of reserved matters application(s) for a phase or subphase of the development within the Outline application site which includes residential development details of the noise levels within external areas (with particular reference to residential garden areas) and any necessary mitigation measures to achieve levels in accordance with BS8233/WHO guidance values shall be submitted to and approved in writing by the Local Planning Authority. All mitigation measures for a phase or sub-phase as may be approved shall be implemented in full in accordance with the agreed timescale and shall thereafter be retained.
- No equipped areas for play shall be installed until such times as a scheme detailing location (to include distance in metres from the nearest dwelling) and precise type of equipment has been submitted for approval by the LPA.
- Prior to commencement of development, a written scheme shall be submitted to and agreed in writing by the local planning authority that specifies the provisions to be made for the level of illumination of the site and to control light pollution. The scheme shall be implemented prior to beneficial use of the approved development and maintained for the lifetime of the approved development and shall not be altered without the prior written approval of the local planning authority. The scheme shall provide that each pole/wall mounted light must be aligned to ensure that the upper limit of the main beam does not exceed 70 degrees from its downward vertical. All pole/wall mounted lighting shall be designed and operated to have horizontal cut-off such that the Upward Waste Light Ratio does not exceed 5%. The submitted scheme shall include an isolux diagram showing, using contour lines if possible, the predicted luminance in the vertical plane (in lux) at critical locations on the boundary of the site and at adjacent sensitive properties (including those within the scheme where appropriate).(note: * = depending on location within the scheme). The applicant's attention is drawn to the Institution of Lighting Professionals Guidance Note for

the reduction of obtrusive light 2011(or later versions). It should be designed so that it is the minimum needed for security and operational processes and be installed to minimise potential pollution caused by glare and spillage).

Regards

Joanna Hart
Senior Environmental Protection Officer

From: Peter Chisnall <Peter.Chisnall@babberghmidsuffolk.gov.uk>
Sent: 31 March 2020 21:08
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/20/01036

Dear Bradly,

Proposal: Application for Outline Planning Permission (Access to be considered) - Erection of up to 300No dwellings, new vehicular access, landscaping, open space and drainage infrastructure.

Location: Ashes Farm, Newton Road, Stowmarket, Suffolk IP14 5AD

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

It is acknowledged that the application is for outline permission but considering the size of the development some consideration of this topic area is expected. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability.

On that basis my recommendation is refusal. If the planning department decided to set conditions on the application, I would recommend the following.

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

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

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/>

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

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

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

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

Guidance can be found at the following locations:

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

Regards,

Peter

Peter Chisnall, CEnv, MIEMA, CEnvH, MCIEH

Environmental Management Officer

Babergh and Mid Suffolk District Council - Working Together

Tel: 01449 724611

Email: peter.chisnall@baberghmidsuffolk.gov.uk

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

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: DM

FROM: Nathan Pittam, Environmental Protection Team DATE: 19/03/2020

YOUR REF: DC/20/01036. Land Contamination

SUBJECT: Application for Outline Planning Permission (Access to be considered) -
Erection of up to 300No dwellings, new vehicular access, landscaping, open
space and drainage

~~Address: Ashes Farmhouse, Newton Road, STOWMARKET, Suffolk,
IP14 5AD.~~

Please find below my comments regarding contaminated land matters only.

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

No development shall take place until:

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.

It is important that the following advisory comments are included in any notes accompanying the Decision Notice:

“There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.

The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.

The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team.”

Nathan Pittam
Senior Environmental Management Officer

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 19 March 2020 12:04
To: Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/20/01036. Air Quality

Dear Bradly

EP Reference : 274007
DC/20/01036. Air Quality
Ashes Farmhouse, Newton Road, STOWMARKET, Suffolk, IP14 5AD.
Application for Outline Planning Permission (Access to be considered) -
Erection of up to 300No dwellings, new vehicular access, landscaping, open
space and drainage infrastructure.

Many thanks for your request for comments in relation to the above application from the perspective of local air quality management. I can confirm that I have no objection to the proposed development from the perspective of local air quality management and it is unlikely that the development will significantly adversely impact on the existing good air quality in the vicinity of the development site and will not result in the compromise of an air quality objective.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk
Work: 07769 566988 / 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk



Suffolk Wildlife Trust

Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org



Bradly Heffer
Planning Department
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

14th July 2020

Dear Bradly,

RE: DC/20/01036 - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure. Ashes Farm, Newton Road, Stowmarket, IP14 5AD

Thank you for sending us details of this application, we have the following comments:

We request that a Landscape and Ecological Management Plan is produced to ensure the habitats onsite are appropriately managed for biodiversity. As this is an outline application, we request that this is a condition of planning consent, should the application be granted. We also request that the green spaces are secured as detailed with the Landscape Masterplan.

We have read the Note on Ecology (RPS Group Ltd, May 2020) in response to the comments by Place Services (March 2020) and we are concerned that the loss of skylark territories is not adequately compensated. We note that it is the applicant does not have sufficient land to provide for these territories however, there is no mention of an offsite mitigation scheme in association with another landowner to help deliver skylark plots. Therefore, we request that this should be delivered so that the loss of territories is compensated for.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jacob Devenney
Planning and Biodiversity Adviser

Consultation Response Pro forma

1	Application Number	DC/20/01036 Ashes Farm, Stowmarket	
2	Date of Response	29.4.20	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would adversely affect the setting and significance of the listed farmhouse and associated farm buildings. 2. The level of harm would be in the range from low towards medium. 3. Harm should be considered in the light of the statutory duty and national policy, and weighed against public benefits of the scheme. 	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Pre-app In 2019 I gave pre-application advice on behalf of Heritage Team on the former farm buildings to the rear of Ashes Farmhouse. I advised that these should be retained for conversion in order to better preserve the setting of the listed farmhouse. The present proposal was not part of that enquiry and to the best of my knowledge there has been no request for pre-application advice from Heritage Team.</p> <p>Site / significance The site is a large area of agricultural land on the north west edge of Stowmarket. At the western end the site is drawn around the listed Ashes Farmhouse. At this point the site is bound to the north by the A14 and the south west by Newton Road. Broadly the site rises from the south west to the north east but the farm buildings sit at a lower level than the rest of the site. The Farmhouse faces south west with outbuildings attached to its north west gable. Behind the Farmhouse gardens run back to the north east. Behind the outbuilding a range of farm buildings stands with a long range along the north west side and covered yards on the south east between single storey wings. The south west end of the building finishes with a larger range.</p> <p>The Farmhouse was listed at grade II in 1988. It comprises a main block of the early 1600s of rendered timber frame with brick gables and slate roof. To the</p>	

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


	<p>rear are an outshut extension and ridged extension of the 1800s. Further features and alterations indicate a significant phase of upgrading in this period.</p> <p>The setting of the farmhouse includes its residential gardens, its farm buildings and surrounding farmland. To the north and east of the farmhouse the land rises before levelling off to the east. The setting of the farmhouse can be defined by this landform. To the north the setting is defined by the A14 road. Although traffic is mainly out of sight, its noise is a near-constant reminder which limits the land's value as countryside. Nonetheless the open spacious character of this part of the site contribute to appreciating the rural history and context of the listed farmhouse and its associated buildings.</p> <p>This setting contributes positively to the significance of the listed farmhouse by its long former association with the farmhouse by ownership and function, which is accentuated by their close visual relationship.</p> <p>Impact As the application is in Outline form with only Access is included, it is not possible to assess fully the impact of the proposal, but I will attempt to indicate the likely range of likely impacts based on the illustrative Masterplan.</p> <p>The proposal will introduce housing with roads, lighting, drainage engineering and other associated infrastructure, changing the character of the land and affecting its contribution to the setting of the listed farmhouse. Around the group of buildings built development is shown at a denser level, closely adjacent at several points to the north east and south east. To the south east buildings would potentially be alongside the listed farmhouse and just beyond the garden wall, on rising ground. From much of Field B the existing buildings are seen against the backdrop of rising land, and development in this area has clear potential for impact. I would also be concerned at the impact of adjacent development on the market viability of the listed farmhouse as a larger house in an ample plot.</p> <p>Harm Built development adjacent to the listed farmhouse and farm buildings would harm their positive relationship with surrounding farmland. The level of impact on the setting of the farmhouse would be medium; the level of</p>
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		<p>harm to the significance of the farmhouse would be in the range from low towards medium.</p> <p>Opportunities to avoid / minimise harm There seems to be scope for separating the farmhouse and barns from built development by adjusting the line of roads and the open space, and for reducing impact through density of development. To the north of the barns it seems there is little scope for built development because of the confines of the site, although this is coloured for denser housing.</p> <p>Process Resulting harm should be weighed in accordance with the statutory duty and national policy, and considered along with potential public benefits of the scheme.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<p>Built development should be kept back from the immediate setting of the farmhouse and farm buildings by amendments to layout with a view to minimising impact on the setting of the historic buildings.</p>
7	<p>Recommended conditions</p>	

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

Consultation Response Pro forma

1	Application Number	DC/20/01036	
2	Date of Response	12/03/2020	
3	Responding Officer	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.  OLYMPUS - 8x4MS Wide - Euro 6 - Smo The road surface and construction must be suitable for an RCV to drive on. There are no details to what the road surfaces will be or if there are private drives, all road construction will need to be suitable built. Please provide plans with each of the bin presentations plotted on, these should be at edge of the curtilage.	
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		

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

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

From: Planning Department <Planning@wlma.org.uk>
Sent: 13 March 2020 11:36
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Cc: Giles Bloomfield <Giles.Bloomfield@wlma.org.uk>
Subject: RE: MSDC Planning Consultation Request - DC/20/01036

Our ref: 20_02323_P Your ref: DC/20/01036

Good morning,

Thank you for consulting the East Suffolk IDB on the above proposal. We note that surface water is proposed to discharge directly to a main river, therefore we have no comments to make at this stage. Should any changes be made to the drainage strategy may I request that the Board be consulted further.

Kind regards,

Ellie

Ellie Roberts
Sustainable Development Officer
| e: ellie.roberts@wlma.org.uk | e: planning@wlma.org.uk

Water Management Alliance
Kettlewell House, Austin Fields Industrial Estate, King's Lynn, Norfolk, PE30 1PH, UK
t: +44 (0)1553 819600 | f: +44 (0)1553 819639 | e: info@wlma.org.uk | www.wlma.org.uk

Consisting of:

Broads Drainage Board, East Suffolk Drainage Board, King's Lynn Drainage Board Norfolk Rivers Drainage Board and South Holland Drainage Board in association with Pevensey and Cuckmere Water Level Management Board

Defenders of the Lowland Environment

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With our commitment to ISO 14001, please consider the environment before printing this e-mail.

The Stowmarket Society



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

10 April 2020

Dear Sirs

Application for Outline Planning Permission (Access to be considered) - Erection of up to 300 No dwellings, new vehicular access, landscaping, open space and drainage infrastructure - Ashes Farm Newton Road Stowmarket Suffolk IP14 5AD - Application. No: DC/20/01036

We wish to make the following comments on this application:-

1. The access strategy needs to be settled. We have always considered that this development should include a commodious road through from Newton Road to the roundabout in Stowupland Road so as not only give full access to the site but to keep some traffic away from the congested area at the junction of the Newton Road and Stowupland Road. It is accepted that this may take place in two stages, when the two land parcels come up separately for development. It looks at present as though the proposal is only to allow traffic to meander through the site from one end to the other, but not to have any through traffic. We think this may be a missed opportunity for this area of town.
2. The new residential area needs properly planned footpath/cycle links into town and neighbouring areas. Thus there should be two footpath/cycle links to Newton Road, one where the drainage corridor is, linking to the station etc, and the other up near Ashes Farmhouse, connecting across to Spring Row/Cardinalls Road.
3. The opportunity should be taken with a bit of public engagement to improve the environment of Newton Road and secure an upgrading of the allotment land which we assume is in the same ownership as the development site. The owner has long seen the land as a possibility for development and so the allotments are not on a particularly secure footing. They are now a strategic facility for the town but they are unfenced and have no water supply - basic requirements these days. The frontage of the allotments to Newton Road is untidy, unsurfaced and used for car parking. Newton Road itself is poorly served with footpaths, the path being on the

west side only and too narrow. If this additional development is to come to the area then these inherent problems need resolving to provide a suitable standard of development for the future. Stowmarket Town Council has stated its desire to increase the provision of allotments within the town and this application could provide an opportunity to help towards reaching this goal. The application boundaries include large areas of low-lying land on the west side of Newton Road which are designated as open-space, parts of which (particularly the roughly triangular patch bounded by Newton Road, Cardinalls Road and Spring Row appear eminently suitable).

4. We are concerned at the limited scope of the traffic analyses which ignore the possible effects of the proposal on Cardinalls Road and Crown Street. With the access road junction placed north of the Spring Row/Newton Road junction, this route is going to be put under pressure by the new housing area, especially as it offers a tempting rat run towards the west-bound A14. Cardinalls Road is already a difficult street to negotiate with on-street car parking limiting the lengths where two vehicles can pass, and with the added problem of the level crossing gates being closed for lengthy periods.

5. The traffic analysis which has been presented does appear over-optimistic in the application of its conjectures. Clearly, the scheme will put additional pressure on Stowupland Road and its level-crossing. The report makes assumptions about the length of time that the gates are closed, but no data on actual periods. These assumptions produce a peak queue of 19 cars southbound, but no discussion of what that looks like on the ground. 19 cars would take the queue well beyond the Newton -Road/Stowupland Road junction particularly as on-street parking on Stowupland Road induces lengthy gaps in queues - and as a result we anticipate significant additional rat-running along Victoria Road by impatient drivers

J Pattle - Secretary
The Stowmarket Society, 19 Bond Street, Stowmarket, IP14 1HR