

Historic England

EAST OF ENGLAND OFFICE

Ms Rebecca Biggs  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Ipswich  
Suffolk  
IP6 8DL

Direct Dial: 01223 582738

Our ref: P00539990

02 December 2016

Dear Ms Biggs

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015**

**PHASE 3D CEDARS PARK, LAND SOUTH OF GUN COTTON WAY,  
STOWMARKET, SUFFOLK, IP14 5EP  
Application No 4556/16**

Thank you for your letter of 29 November 2016 notifying Historic England of the application for listed building consent/planning permission relating to the above site. On the basis of the information provided, **we do not consider that it is necessary for this application to be notified to Historic England** under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or if there are other reasons for seeking the advice of Historic England, we would be grateful if you could explain your request. Please do not hesitate to telephone me if you would like to discuss this application or the notification procedures in general.

We will retain the application for four weeks from the date of this letter. Thereafter we will dispose of the papers if we do not hear from you.

Yours sincerely

**Clare Campbell**

Principal Inspector of Historic Buildings and Areas  
E-mail: [clare.campbell@HistoricEngland.org.uk](mailto:clare.campbell@HistoricEngland.org.uk)

Enclosure: List of applications requiring consultation with and notification to Historic England



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





**Planning and Listed Building Consent applications requiring consultation with and notification to Historic England (the Historic Buildings and Monuments Commission for England) April 2015**

**Applications for planning permission**

Historic England must be consulted or notified (see note 1) of the following planning applications by virtue of the following provisions:

**Consultation:**

Development which in the opinion of the local planning authority falls within these categories:

- P1 Development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or II\*
- P2 Development likely to affect the site of a scheduled monument
- P3 Development likely to affect any battlefield or a Grade I or II\* park or garden of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953

**Basis for this - Town and Country Planning (Development Management Procedure) (England) Order 2015 - article 18 and Schedule 4.**

- P4 Development likely to affect certain strategically important views in London

**Basis for this - Secretary of State for Communities and Local Government Directions relating to Protected Vistas 2012**

**Notification:**

Development which the local authority (or Secretary of State) think would affect:

- P5 The setting of a Grade I or II\* listed building; or
- P6 The character or appearance of a conservation area where
  - i) the development involves the erection of a new building or the extension of an existing building; and
  - ii) the area of land in respect of which the application is made is more than 1,000 square metres

**Basis for this - Planning (Listed Buildings and Conservation Areas) Regulations 1990 - regulation 5A (as amended by The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015**

- P7 Local authority/ies own applications for planning permission for relevant demolition in conservation areas. (see note 2)

**Basis for this - Town and Country Planning General Regulations 1992 (as amended by the Town and Country Planning General (Amendment) (England) Regulations 2015**

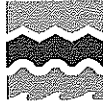
Note 1: There is a difference between Consultation and Notification. When LPAs consult on applications, there is a duty to provide a substantive response to the LPA within 21 days. A notification from the LPA is to enable representations to be made if we so wish, and to respond within 21 days. Historic England does not make a distinction in its handling of advice work.



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Historic England

EAST OF ENGLAND OFFICE

### **Applications for listed building consent**

Historic England must be notified of the following applications for listed building consent by virtue of the following provisions:

#### **Notification:**

- L1 For works in respect of any Grade I or II\* listed building; and
- L2 For relevant works in respect of any grade II (unstarred) listed building

(relevant works means:

- i) works for the demolition of any principal building (see note 3);
- ii) works for the alteration of any principal building which comprise or include the demolition of a principal external wall of the principal building; or
- iii) works for the alteration of any principal building which comprises or includes the demolition of all or a substantial part of the interior of the principal building.

For the purposes of sub paragraphs ii) and iii) above:

- a) a proposal to retain less than 50% of the surface area of that part of a principal building represented on any elevation (ascertained by external measurement on a vertical plan, including the vertical plane of any roof) is treated as a proposal for the demolition of a principal external wall;
  - b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.)
- L3 Decisions taken by the local planning authorities on these applications.

**Basis for this - Arrangements for handling heritage applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015 - made under section 12, 15 (1) and (5) of the Planning (Listed Buildings and Conservation Areas) Act 1990**

**Historic England**  
**15 April 2015**

Note 2: Relevant demolition is defined in section 196D of the Town and Country Planning Act 1990 as "demolition of a building that is situated in a conservation area in England and is not a building to which section 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not apply by virtue of s75 of that Act (listed buildings, certain ecclesiastical buildings, scheduled monuments and buildings described in a direction of the Secretary of State under that section.)

Note 3: "principal building" means a building shown on the list compiled under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and includes (unless the list entry indicates otherwise) any object or structure fixed to that building, but does not include any curtilage building.



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Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

## Rebecca Biggs

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**From:** Abby Antrobus  
**Sent:** 13 June 2017 11:52  
**To:** Kate Batt; Rebecca Biggs  
**Cc:** Rachael Abraham  
**Subject:** FW: 0019/17,- Land South of Gun Cotton Way, Stowmarket  
**Attachments:** SCCAS (KB)\_15-2375\_Land to the south of, Gun Cotton Way, Stowmarket-Eval by cond.doc

Dear Rebecca,

Thank you for your e-mail and apologies for the time that has passed.

The archaeological work for site **0019/17** has not yet been undertaken, so conditions from the previous consent would still be appropriate, please (I've re-attached Kate's letter).

**4556/16** has previously been subject to archaeological evaluation, which did not reveal significant finds or features and so there would not be a need for a condition on any consent for this site.

**4555/16** has not been subject to systematic archaeological field evaluation and archaeological investigations undertaken in connection with earlier phases of the Cedar's Park development identified significant remains dating from the Iron-Age and Roman periods. There is high potential for further remains to extend into the development site. In accordance with paragraph 141 of the NPPF, SCCAS would recommend that any consent is subject to conditions relating to archaeological work, with a programme of archaeological evaluation as a first stage to allow investigation/mitigation strategies to be designed. We would recommend the following conditions:

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

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

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

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

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (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 have copied in Kate Batt as case-officer for these sites if you would need more formal response in due course – do get in touch if you would like to discuss anything further,

With best wishes,  
Abby

**Dr Abby Antrobus**

Senior Archaeological Officer

Suffolk County Council Archaeological Service

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

Tel: 01284 741231

Mob: 07785950022

Website: <https://www.suffolk.gov.uk/archaeology>

Heritage Explorer: <https://heritage.suffolk.gov.uk/>

Ipswich Archive: [http://archaeologydataservice.ac.uk/archives/view/ipswich\\_parent\\_2015/index.cfm](http://archaeologydataservice.ac.uk/archives/view/ipswich_parent_2015/index.cfm)

Ipswich Urban Archaeological Database: <https://heritage.suffolk.gov.uk/ipswich-uad>

## **Rebecca Biggs**

**From:** James Meyer <james.meyer@suffolkwildlifetrust.org>  
**Sent:** 23 June 2017 16:16  
**To:** Rebecca Biggs  
**Subject:** RE: Gun Cotton Way

Hi Rebecca,

Thank you for the additional information, I've had a quick look at this and we have the following comments:

### **Application 4556/16**

#### County Wildlife Site/Wildlife Protection Area

The Wildlife Protection Area (WPA) at the western end of the application site was intended to be retained as a remnant of the County Wildlife Site (CWS) which will be largely lost to the proposed development. The WPA was created as part of the works approved under planning permission 2372/14 and involved the translocation of turtles and reptiles from the CWS. From the information provided in the drainage layout drawing (Richard Jackson Consulting) it appears that the majority of the WPA will be lost to the creation of the attenuation basin. This would result in almost the complete loss of the original CWS. No measures appear to be provided to compensate for this loss and it would therefore be a net loss of biodiversity in the area, contrary to policies 7.8 and 9.1 of the Stowmarket Area Action Plan. We would object to any development which is contrary to these policies.

#### Reptiles

We note the additional information provided in relation to reptile translocation. It appears that a considerable number of animals have already been translocated in to the receptor location in site 3A and we query whether it has capacity to take any more. We recommend that this is assessed before any further translocation activity takes place. A new receptor site must be found if no capacity exists in the current receptor area.

We are also concerned about the proposed translocation from the WPA to the receptor area and then back to the WPA which is proposed as potentially part of the mitigation work. Dependent on the timescales involved, it is possible that this will result in triple handling of some animals (from the CWS to the WPA; from the WPA to the receptor area; from the receptor area back to the WPA) which is not good practice.

### **Application 4555/16**

With regard to planning application 4555/16, we note that the unsigned/undated ecology statement provided summarises the reptile translocation works which have taken place on site 3A. The statement includes reference to the reduction in size of the reptile receptor area (removal of the 'extension') and the translocation of animals to the retained receptor area. We query whether this area is large enough to support these animals, particularly as it appears that animals from application site 4556/16 will also be translocated to this area. We recommend that this is assessed before any further translocation activity takes place. A new receptor site must be found if no capacity exists in the current receptor area.

If you have any further queries please do not hesitate to contact me.

Kind regards

James

**James Meyer**  
**Senior Conservation Planner**

**From:** Michelle Marshall [mailto:Michellelm@stowmarket.org]  
**Sent:** 13 December 2016 08:22  
**To:** BMSDC Planning Area Team Yellow; Planning Admin  
**Subject:** Planning application 4556/16

Please see below for comments regarding planning application 4556/16.

4556/16

*The Town Council opposes the application.*

*The Town Council has serious concerns regarding the composition of the hybrid application, specifically the outline designation of the proposal for three commercial units.*

*The Town Council would recommend that the District Council set conditions to ensure certainty that the commercial units be constructed as part of the development of Phase 3D, with no option for the developer to rescind on the proposal, leaving only residential development on an area which was originally designated for commercial activity.*

Kind regards,  
Michelle

Michelle Marshall  
Deputy Town Clerk

Stowmarket Town Council  
Milton House | Milton Road South | Stowmarket | Suffolk | IP14 1EZ

01449 612060 | [michellelm@stowmarket.org](mailto:michellelm@stowmarket.org) | [www.stowmarket.org](http://www.stowmarket.org)



@stowmarketTC



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**Please consider the environment – do you really need to print this email?**



## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	4556/16 Phase 3D Cedars Park, Land South of Gun Cotton Way, Stowmarket						
<b>2</b>	<b>Date of Response</b>	16/02/2017						
<b>3</b>	<b>Responding Officer</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Name:</td> <td>Rebecca Styles</td> </tr> <tr> <td>Job Title:</td> <td>Heritage Officer</td> </tr> <tr> <td>Responding on behalf of...</td> <td>Heritage</td> </tr> </table>	Name:	Rebecca Styles	Job Title:	Heritage Officer	Responding on behalf of...	Heritage
Name:	Rebecca Styles							
Job Title:	Heritage Officer							
Responding on behalf of...	Heritage							
<b>4</b>	<b>Summary and Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> <li>• No harm to the setting of designated heritage assets because this proposal would be read in the context of existing modern residential and commercial development, away from historic assets.</li> </ul>						
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>This application seeks full planning permission for the erection of 48 no. dwellings, and outline planning permission for the erection of 3 no. commercial units to the south of Gun Cotton Way, Stowmarket.</p> <p>The Heritage team considers that this proposal will not harm the setting of any heritage assets and does not object to the proposal.</p> <p>The proposed development would be erected to the south of existing modern residential development and Tesco superstore and filling station to the east of Stowmarket. There are no listed buildings in the immediate setting of the application site.</p> <p>Home Farm and Clamp Farm are to the SE of the site, some 300m from the proposal site, which are both GII listed. It is not considered that this scheme will harm the setting of these heritage assets, as the proposed development will be read in the context of existing commercial and residential development, some distance from the listed buildings.</p> <p>The GII* Cedars Hotel is located SW of the application site, but is separated by some 400m, intersected by the train line and large scale industrial units. It is not considered that this proposal would harm the setting of the GII* listed building.</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>The Stowmarket Conservation Area is located to the west of the application site, and glimpses of the proposed development may be visible from the historic core of Stowmarket. Nonetheless, these views will be read in the context of existing modern development, and will not harm the setting of the Conservation Area.</p> <p>No objection.</p>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<p><b>Recommended conditions</b></p>	

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

<b>1</b>	<b>Application Number</b>	4556/16 Hybrid Application OPP : 3 commercial units FULL: 45 dwellings	
<b>2</b>	<b>Date of Response</b>	January 2017	
<b>3</b>	<b>Responding Officer</b>	Name:	Delia Cook
		Job Title:	Economic Development Officer
		Responding on behalf of...	Economic Development Team
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<p>The Economic Development Team were included in pre application discussions on this site and, although final proposals represent a further reduction in employment uses to those discussed, the Team wish to support this application but subject to the following recommendations:</p> <p>Developer to provide appropriate viability evidence to support OPP for only 3 commercial units on site. We understand that this is presently with MSDC Viability Officer.</p> <p>Safeguarding of B class uses on other employment land allocation at Mill Lane is a priority.</p> <p>Ensure that all commercial units are constructed to highest possible sustainability/energy efficiency standards – developer to liaise with MSDC Environmental Management Officer</p> <p>Developer is to be solely responsible for ensuring all site boundaries are secure with adequate boundary treatment and to ensure that the security of these boundaries is maintained at all times. This to be applied in particular to those boundaries adjacent to established industrial/business operations.</p>	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The Core Strategy Focused Review acknowledged constraints of delivering employment land on Cedars Park in accordance with Mid Suffolk Local Plan 1998 (Mid Suffolk Core Strategy 2008 Policy CS 11), consequently the Stowmarket Area Action Plan (SAAP) 2013 allocated additional employment land at Mill Lane essentially for Class B uses.</p> <p>The application represents a considerable reduction to the quantum of valuable employment land in an area that is well suited to such uses due to its proximity to both 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>railway station and the A14 junction 50 and its proximity to existing mixed use employment. Consequently, it is vital that the small business units are developed and marketed efficiently. An important aspect of this is that the developer undertakes appropriate market research prior to development to identify demand.</p> <p>Additional employment land is vital to the growth and sustainability of the local economy as it provides an opportunity for established businesses to either expand or update existing operations. It ensures that the supply of employment land is maintained to attract new businesses into the locality.</p> <p>In addition, the loss of more valuable retail/leisure type employment generating uses at Gun Cotton Way could result in pressure on the LPA to amend Class B type uses on the Mill Lane employment land.</p> <p>Although there is a requirement for new housing within the District and particularly for affordable housing, data suggests that unless additional employment opportunities become available within Stowmarket occupants of new housing might have to out-commute to find employment. This is not ideal as it could reduce potential spend in the local economy</p>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	Please see above.
7	<b>Recommended conditions</b>	See recommendations above if these appropriate for Condition within Planning Permission

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:** Nathan Pittam  
**Sent:** 22 December 2016 10:44  
**To:** Planning Admin  
**Subject:** 4556/16/HYB. EH - Land Contamination.

**M3 : 187259**  
**4556/16/HYB. EH - Land Contamination.**  
**Land south of, Gun Cotton Way, STOWMARKET, Suffolk.**  
**Phase 3D Cedars Park. Hybrid planning application consisting of full planning permission for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class A3, ..**

Many thanks for your request for comments in relation to the above application. I have reviewed the Phase I and II studies submitted in support of the application and can confirm that I agree with their conclusions that the risks from previous uses of the site are low and as such I have no objections to raise with respect to land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer  
**Babergh and Mid Suffolk District Councils – Working Together**  
t: 01449 724715  
m: 07769 566988  
e: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** RM PROW Planning  
**Sent:** 28 December 2016 16:15  
**To:** Planning Admin  
**Cc:** Francesca Clarke  
**Subject:** RE: Consultation on Planning Application 4556/16

**Our Ref: W499/023/ROW859/16**

**For The Attention of: Rebecca Biggs**

**Public Rights of Way Response**

Thank you for your consultation concerning the above application, apologies for our late response.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

The proposal as submitted would have a direct effect on a public right of way; Stowupland Public Footpath 23, which is recorded through the site.

The public right of way has not been shown on the plans, which seem to indicate that trees and hedging will be planted on top of the footpath.

The Rights of Way and Access Team therefore **objects** to the proposal as submitted on the basis that the proposed planting will be an obstruction to the highway.

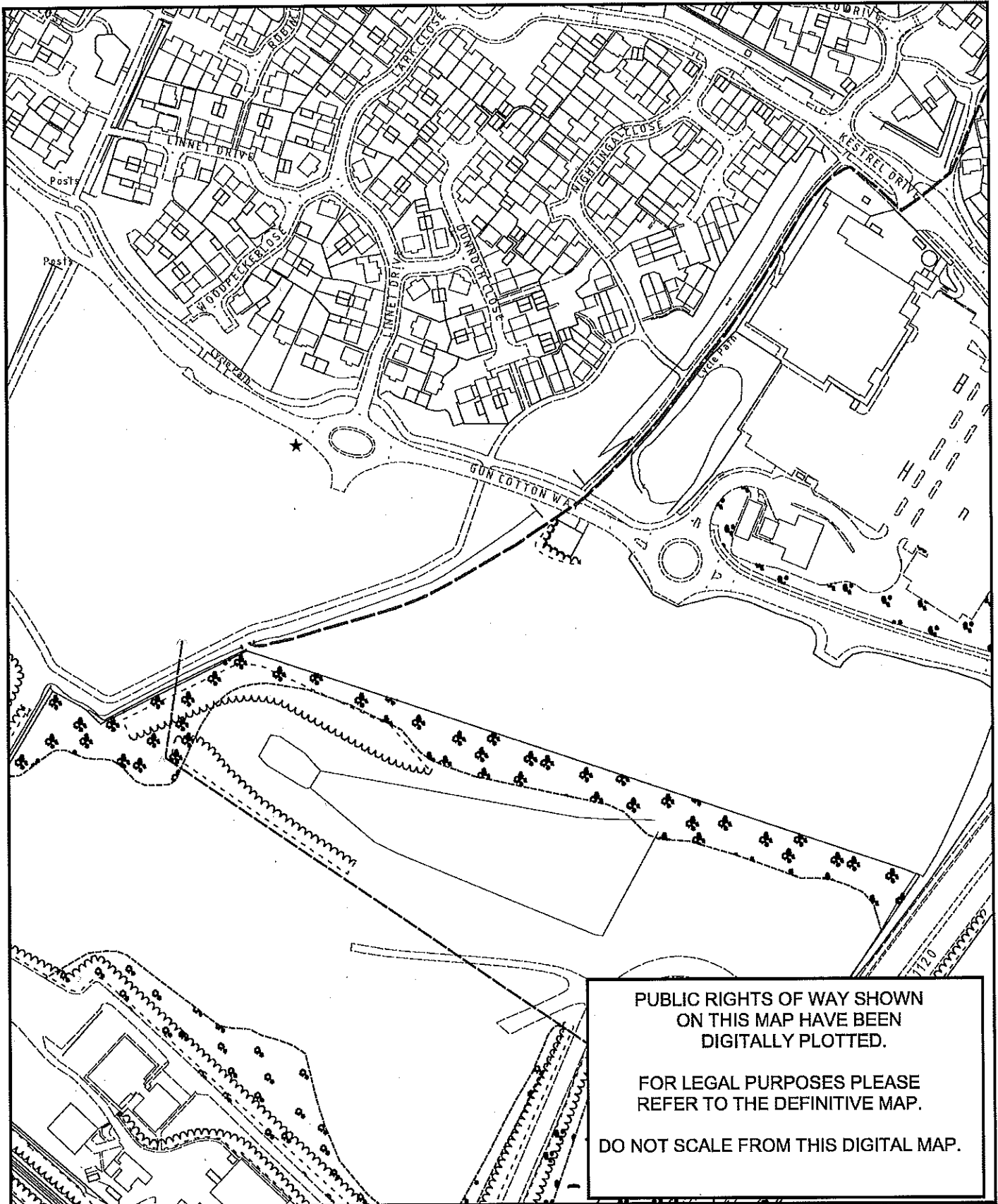
Public Footpath 23 should be accommodated within a green corridor. Planting is to be at least 2m away from the path to prevent obstruction and hedging is to be non-invasive varieties.

Attached is a 1:2500 digital plot of Stowupland Public Footpath 23, which is as near as can be ascertained and is not to be scaled from; along with Applicant Responsibility guidance.

Regards

**Jackie Gillis**  
**Green Access Officer**  
**Access Development Team**  
Rights of Way and Access  
Resource Management, Suffolk County Council  
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

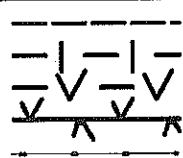
 <http://publicrightsofway.onesuffolk.net/> | **Report A Public Right of Way Problem Here**



**4556/16 Phase 3D Cedars Park, land south of Gun Cotton Way, Stowmarket**  
**Public Footpath 23**



Resource Management  
 Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

- Public Footpath
- Bridleway
- Restricted Byway
- Byway
- Definitive Map Parish Boundary

Scale 1:2500



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Date: 28/12/2016



## **Planning Applications – Suggested Informative Statements and Conditions Report**

AW Reference: 00018976

Local Planning Authority: Mid Suffolk District

Site: Phase 3D Cedars Park,, Gun Cotton Way,  
Stowmarket

Proposal: Hybrid planning application consisting of full  
planning permission for the erection of 48  
dwellings and outline planning permission  
for 3 commercial units (1 no. Class A3, 1 no.  
Class A4 and 1 no. Class A3/A5) with  
'appearance' and individual plot landscaping  
as reserved matters.

Planning Application: 4556/16

**Prepared by: Mark Rhodes**

**Date: 11 January 2017**

If you would like to discuss any of the points in this document please  
contact me on 0345 0265 458 or email  
[planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

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## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 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**

- 2.1 The foul drainage from this development is in the catchment of Stowmarket Water Recycling Centre that will have available capacity for these flows.

### **Section 3 – Foul Sewerage Network**

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

### **Section 4 – Surface Water Disposal**

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application show the surface water connecting to sewers that are currently under a section 104 agreement and are not owned by Anglian Water, therefore this is outside our jurisdiction for comment and the Planning Authority will need to seek the views of the Environment Agency.

We will request that the agreed strategy is reflected in the planning approval

### **Section 5 – Trade Effluent**

- 5.1 Not applicable
-





Environment  
Agency

Rebecca Biggs  
Mid Suffolk District Council  
Planning Department  
131, Council Offices High Street  
Needham Market  
Ipswich  
IP6 8DL

**Our ref:** AE/2016/121118/02-L01  
**Your ref:** 4555/16  
**Date:** 09 January 2017

Dear Ms Biggs

**ERECTION OF 143 DWELLINGS AND 15 CLASS B1 UNITS. PHASES 3A & 3C  
CEDARS PARK, LAND SOUTH OF GUN COTTON WAY, STOWMARKET IP14 5EP**

Further to our previous letter, referenced AE/2016/121118/01-L01 and dated 19 December 2016, we have received updated figures relating to capacity at the Stowmarket Water Recycling Centre. Following discussions with Anglian Water, we are satisfied that our holding objection on foul drainage grounds can be removed.

Yours sincerely



**Miss Eleanor Stewart**  
**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8097  
Email [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)

cc Melville Dunbar Associates



Environment  
Agency

Ms. Rebecca Biggs  
Mid Suffolk District Council  
Planning Department  
131, Council Offices High Street  
Needham Market  
Ipswich  
IP6 8DL

Our ref: AE/2016/121122/01-L01  
Your ref: 4556/16  
Date: 20 December 2016

Dear Ms. Biggs

**HYBRID PLANNING APPLICATION CONSISTING OF FULL PLANNING PERMISSION FOR 48 DWELLINGS WITH ACCESS ROAD, FOOTPATHS, LANDSCAPING, DRAINAGE AND PARKING AND OUTLINE PLANNING PERMISSION FOR 3 COMMERCIAL UNITS (CLASS A3, CLASS A4 AND CLASS A3/A5) WITH ACCESS ROAD, FOOTPATHS, STRATEGIC LANDSCAPING, DRAINAGE AND PARKING. MATTERS TO BE CONSIDERED UNDER THE OUTLINE ARE; 'ACCESS', 'LAYOUT', 'SCALE' AND STRATEGIC SITE LANDSCAPING. MATTERS RESERVED ARE; 'APPEARANCE' AND INDIVIDUAL PLOT LANDSCAPING. LAND TO THE SOUTH SIDE OF GUN COTTON WAY, STOWMARKET, SUFFOLK, IP14 5EP.**

Thank you for your consultation dated 29 November 2016. We have inspected the application as submitted and are raising a holding objection with regards to foul drainage. Our letter contains details of our objection as well as advice to how it can be overcome. We have also included advice in regards to COMAH establishments.

### **Foul Drainage**

Our figures indicate that there is no headroom for additional development within the Environmental Permit for Stowmarket Water Recycling Centre (WRC). Bringing these additional properties on-line at this time is likely to lead to a breach of the permit limits for Stowmarket WRC, resulting in the potential for environmental damage. The National Planning Policy Framework, paragraph 109, states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. We therefore object to this proposed development until such time as it can be shown to our satisfaction that capacity for the foul water flows is available.

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

Cont/d..

## **Overcoming our Objection**

The developer must undertake further discussions with Anglian Water as to how capacity is going to be created for these additional properties without causing the permit limits to be exceeded.

Properties should not be built until it has been confirmed that plans are in place to create additional capacity as required, and should not be occupied until it has been confirmed that adequate capacity has been provided and permitted as required.

## **Advice to LPA on COMAH Establishments**

The proposed development is within 300m of a facility notified under the Control of Major Accident Hazards Regulations 2015 (COMAH) as an Upper Tier establishment, COMAH establishments are regulated by the COMAH Competent Authority (the Health & Safety Executive and Environment Agency acting jointly).

The planning authority should review the HSE's consultation distance zones for the COMAH establishment and consult the HSE by use of their Planning Advice Web App as appropriate. Further information on the HSE's Land USE Planning Methodology is available at <http://www.hse.gov.uk/landuseplanning/methodology.pdf>

The proposed development is also within 200m and 450m of facilities which hold Environmental (Installation) permits under the Environmental Permitting Regulations 2010, which are regulated by the Environment Agency.

New development within 250m of a permitted facility could result in the community at the proposed development being exposed to amenity impacts such as odour, noise and dust. The severity of these impacts will depend on local factors such as the nature of the activities carried out at the permitted facilities. If the operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and community will co-exist, with some residual impacts. In some cases, these residual impacts may cause local residents concern, and there are limits to the mitigation the operator can apply. Only in very exceptional circumstances would we revoke the operators permit. Further information on environmental permitting is available on the gov.uk at <https://www.gov.uk/topic/environmental-management/environmental-permits>

We trust this information is useful.

Yours sincerely



**Mr. Pat Abbott**  
**Planning Advisor**

Direct dial 02084748011

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

Cont/d..

## Rebecca Biggs

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**From:** Martin Egan  
**Sent:** 22 June 2017 15:39  
**To:** Rebecca Biggs  
**Subject:** 4556/16 Stowmarket  
**Attachments:** MS/4555/16 & MS/4556/16 - Gun Cotton Way, Stowmarket Travel Plan; MS\_4556\_16.docx

Hi Rebecca,

I do not agree with the views of the agent, Mr McIntosh. However, the shortcomings in the application are sadly not sufficient to warrant a recommendation of refusal. Therefore, please find attached some suitable highway conditions. The Travel Plan comments / S106 request is attached as a separate email.

For information application 4555/16 is in the process of being assessed by Samantha Harvey and a response should be with you early next week.

Regards,

Martin Egan,  
Highways Development Management Engineer,  
Strategic Development,  
Resource Management,  
Suffolk County Council,  
Endeavour House,  
8 Russell Road, Ipswich,  
IP1 2BX,  
[martin.egan@suffolk.gov.uk](mailto:martin.egan@suffolk.gov.uk)  
[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

**From:** Phillip McIntosh [<mailto:P.McIntosh@MelvilleDunbarAssociates.com>]  
**Sent:** 12 June 2017 11:04  
**To:** Rebecca Biggs <[Rebecca.Biggs@baberghmidsuffolk.gov.uk](mailto:Rebecca.Biggs@baberghmidsuffolk.gov.uk)>  
**Cc:** 'info' <[info@melvilledunbarassociates.com](mailto:info@melvilledunbarassociates.com)>  
**Subject:** RE: 4556/16 and 4555/15- Gun Cotton Way (Email 1of2)

Hi Rebecca

Thank you for your email. We comment as follows;

1. Given the provision of visitor parking across the site (see para below) we do not consider there is a need to provide specific visitor parking within the parking court for apartments 3-11. At 1.5 spaces per dwelling this equates to a need for 13.5 spaces. The average number of cars per household for Stowmarket North (ward) is 1.37 and therefore, applying this figure to the apartment block results in a requirement for 12.3 spaces. We have proposed a communal parking court for the apartments, rather than allocated parking. According to the parking standards where this is the case, there can be some flexibility applied to the standards (up to 25%). The site is also sustainably located in close proximity to local services and the town centre (walking/cycling or public transport). As such we consider that 12 residents only communal parking spaces within this parking court provides sufficient off street parking in line with the SCC parking standards.
2. There are 6 visitor spaces at either end of the development, providing a total of 12 spaces which meets the parking standards in terms of numbers. As per my previous comments (10 May), the site is not large and

therefore, the distance to walk to the properties which are centrally positioned within the site is only short (less than 100m). Plots 1, 2, 36, 37 and 47 benefit from visitors being able to park on the driveway and therefore, would be unlikely to place demand on the need for visitor parking. There would also be the potential for informal visitor parking between plots 38 and 48 on the road. As such we consider the site is well served in terms of provision for visitor parking.

3. We previously commented on this matter on 10 May however, to reiterate, access through this part of the site should be kept to a minimum as it is an ecologically sensitive (wildlife protection) area. Therefore, we consider provision of a 'cyclists dismount' sign at either end of the path can address concerns in relation to this matter and can be secured by condition.

With regard to the conditions sought by Sue Hooton in relation to ecology, our only query is in relation to application 4555 which appears to relate to a different ecology report and consequently a different site. We consider they should be consistent with those conditions as set out in her comments on application 4556.

Are you on track to get the application to the 28 June committee?

Please give me a call if you wish to discuss any of these matters.

Kind regards

Phillip McIntosh B RTP (Hons) MRTPI  
Senior Planning Director

For and on behalf of  
Melville Dunbar Associates



**MELVILLE DUNBAR ASSOCIATES**  
**PLANNING URBAN DESIGN ARCHITECTURE**  
The Mill House, Kings Acre, Coggeshall, Essex CO8 1NY  
Tel: 01376 562820 Email: [info@melvilledunbarassociates.com](mailto:info@melvilledunbarassociates.com)  
Fax: 01376 561437 Web: [www.melvilledunbarassociates.com](http://www.melvilledunbarassociates.com)

01376 562820  
01376 561437

Your Ref: MS/4556/16  
Our Ref: 570\CON\2181\17  
Date: 22<sup>nd</sup> June 2017  
Highways Enquiries to: martin.egan@suffolk.gov.uk



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

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

The Planning Officer  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Ipswich  
Suffolk  
IP6 8DL

**For the Attention of:** Rebecca Biggs

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4556/16**

**PROPOSAL:** Hybrid planning application consisting of full planning permission for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class A3, 1 no. Class A4 and 1 no. Class A3/A5) with 'appearance' and individual plot landscaping as reserved matters.

**LOCATION:** Phase 3D, Cedars Park, Land South Of Gun Cotton Way, Stowmarket, IP14  
**5EP**

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:

1  
**Condition:** Before any of the new dwellings or commercial units are first occupied the developer shall construct a 3m wide combined footway/cycleway along the Gun Cotton Way frontage of the site in accordance with drawing Number 45391-C-007 as submitted and in accordance with details which shall first have been submitted to and approved by the Local Planning Authority.

**Reason:** To ensure that suitable footway and cycleways are provided to access the commercial units and the residential development and to connect each development to the existing adjacent facilities.

2 AL 3

**Condition:** The new vehicular accesses shall be laid out and completed in all respects in accordance with Drawing No. 1467-3D-P001 Revision A as submitted and made available for use prior to any commercial unit or new dwelling is first occupied. Thereafter the accesses shall be retained in the specified form.

**Reason:** To ensure that the accesses are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

3 ER 1

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

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

#### 4 ER 2

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

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

#### 5 P 1

Condition: The use shall not commence until the areas within the site shown on Drawing Number 1467-3D-P001 Revision A as submitted for the purposes of loading, unloading manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

#### 6

Condition: Before the development is commenced details of the areas to be provided in the commercial development for secure covered cycle storage for both customers and employees and details of changing facilities including storage lockers and showers 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: In the interests of sustainable development as set out in the NPPF, and Strategic Objectives SO3 and SO6 of the Mid-Suffolk Core Strategy Focused Review (2012)

Note: The employee cycle storage shall be in a lockable facility away from public access to maximise the uptake in cycling among employees.

#### 7

Condition: Before the development hereby permitted is occupied full details of the electric vehicle charging points to be installed in the development shall have been submitted to the Local Planning Authority and approved in writing.

Reason: To ensure that the development makes adequate provision for electric vehicle charging points to encourage the use of electric vehicles in accordance with paragraph 3.4.2 of the Suffolk Guidance for Parking and paragraph 35 of the National Planning Policy Framework.

#### 8 NOTE 02

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. The County Council's Central Area Manager must be contacted on Telephone: 01473 341414. Further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

#### 9 NOTE 12

The existing street lighting system may be affected by this proposal. The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer.

## 10 NOTE 15

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

## SECTION 106 REQUIREMENTS

### Travel Plan

Please refer to the attached comments from Chris Ward, Travel Plan Officer, which also set out the Section 106 requirements in terms of the Travel Plan.

In addition to the Travel Plan contributions, there are also Highway requirements for improvements of the Public Right of Way network and also the public transport infrastructure:

### Public Transport

There is a desire to upgrade the existing bus stops within the Gun Cotton Way site frontage for the benefit of potential employees, residents and visitors. To allow for construction of a bus shelter base and enclosed bus shelter on each side of the road to coincide with the existing bus stops, with one real time passenger information display screen on the town bound bus stop, a total of **£23,600 is requested**. This breaks down to £6,800 for each shelter and associated base and £10,000 for one RTPI screen.

### Public Rights of Way Response

*Please note that the comments in relation to Public Rights of Way are common to phases 3A, 3C and 3D and that the requested contribution should be shared between each site.*

The proposed developments on Gun Cotton Way will have a direct impact on the local public rights of way (PROW) network. (Map previously supplied).

PROW are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism; the long distance River Gipping Valley Path (FP12 & FP57), a route from Stowmarket to Ipswich, runs near the site and is a route used for green commuting and leisure.

FP15 provides another leisure and green commuting footpath alongside the development area.

The anticipated increased use of the PROW network of as a result of the developments will require the following offsite improvement works:

- Resurfacing and widening of Stowmarket FP15: 715m length x min 3m width = 2145m<sup>2</sup> @ £25/m<sup>2</sup> = £53,625.00
- Resurfacing of Stowmarket FP12: 1135m length x min 1.5m width = 1703m<sup>2</sup> @ £25/m<sup>2</sup> = £42,562.50
- Resurfacing of Stowmarket FP57: 520m length x min 1.5m width = 780m<sup>2</sup> @ £25/m<sup>2</sup> = £19,500.00

Estimates based on the average market costs to provide a hoggin type surface.

The subtotal of these works is £115,687.50

Staff time (design & project management) @ 12% = £13,882.50

Contingency @ 10% = £11,568.75



Total s106 funding requested from this development, and shared between the adjacent current application sites will be a total of **£141,138.75**

The policy framework for these requirements is:

- The county council's rights of way improvement plan which, inter alia, highlights the importance of development in rural areas should give people the greatest opportunity to access the countryside by walking and cycling,
- The walking strategy, which seeks to ensure existing communities with a population over 500, and new developments over 10 dwellings have easy access to a one mile natural walk or 2ha of green space, within 500m of their home,
- The cycling strategy, which seeks to promote a transfer to cycling (and walking) for short distance trips, plan and design for the future with cycling in mind and create a safe and cycle friendly environment,
- The Joint Health and Wellbeing Strategy for Suffolk, outcome 2 of which states Suffolk residents should have access to a healthy environment and take responsibility for the own health and wellbeing,
- You will already be aware of course that, amongst other health and wellbeing objectives, policies set out under the NPPF; the following sections bear relevance to Public Rights of Way:

#### Section 3 - Supporting a prosperous rural economy

Para 28 - To promote a strong rural economy, local and neighbourhood plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.

#### Section 4 - Promoting sustainable transport

Para 35 - refers to priority given to pedestrian and cycle movements, creating safe and secure routes to minimise conflicts between traffic and cyclists or pedestrians and to consider the needs of people with disabilities by all modes of transport.

#### Section 8 - Promoting healthy communities

Para 69 - Planning policies and decisions, in turn, should aim to achieve places which promote safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

Para 73 - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.

Para 75 - Planning policies should protect and enhance public rights of way and local authorities should seek opportunities to provide better facilities for users, for example by adding links to the rights of way network.

Yours faithfully,

**Mr Martin Egan**  
**Highways Development Management Engineer**  
Strategic Development – Resource Management

**From:** David Pizzey  
**Sent:** 06 December 2016 11:13  
**To:** Rebecca Biggs  
**Cc:** Planning Admin  
**Subject:** 4556/16 Phase 3D Cedars Park, Stowmarket.

Rebecca

I have no objection to this proposal subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report. No significant trees are proposed for removal or should be affected.

Regards

David

**David Pizzey**  
Arboricultural Officer  
Hadleigh office: 01473 826662  
Needham Market office: 01449 724555  
[david.pizzey@baberghmidsuffolk.gov.uk](mailto:david.pizzey@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Your ref: 4556/16  
 Our ref: 00045622  
 Date: 22 December 2016  
 Enquiries to: Peter Freer  
 Tel: 01473 264801  
 Email: [peter.freer@suffolk.gov.uk](mailto:peter.freer@suffolk.gov.uk)

Rebecca Biggs  
 Senior Planning Officer  
 Planning Department  
 Mid Suffolk District Council  
 Council Offices  
 131 High Street  
 Needham Market  
 Ipswich  
 IP6 8DL

Dear Rebecca,

**Re: Stowmarket, Phase 3D Cedars Park, land South of Gun Cotton Way - Hybrid planning application consisting of full planning permission for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class A3, 1 no. Class A4 and 1 no. Class A3/A5) with 'appearance' and individual plot landscaping as reserved matters..**

Proposed number of dwellings from development:	1 Bedroom apartments	2 Bedroom apartments	2 bedroom + Houses	Total
	6	9	33	48
Approximate persons generated from proposal	8	20.7	76	105

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council.

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

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

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

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

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

### **Community Infrastructure Levy**

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

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

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

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

### **Site specific mitigation will be covered by a planning obligation and/or planning conditions.**

The details of specific CIL contribution requirements related to the proposed scheme are set out below:

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

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide

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

[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

School level	Minimum pupil yield:	Required:	Cost per place £ (2016/17):
Primary school age range, 5-11*:	12	12	4,348
High school age range, 11-16:	9	9	18,355
Sixth school age range, 16+:	2	2	19,907

<b>Total education contributions:</b>	<b>£257,185.00</b>
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The local catchment schools are Stowmarket Cedars Park Community Primary School and Stowupland High School.

Based on existing forecasts SCC will have no surplus places available at the catchment primary school on Cedars Park and due to site constraints are unable to further expand this school. Therefore primary age pupils will be offered a place at Trinity Church of England Voluntary Aided Primary School. The project cost of providing additional space at this school is estimated to be £4,348 per place (2016/17 costs) which is a saving of about £7,800 compared to the usual cost multiplier of £12,181 per place.

In addition as the primary school is not the catchment school the County Council will most likely need to fund school transport costs arising which are estimated at £750 per annum per pupil. The policy is that the County Council will provide transport when a child under 8 years of age and lives more than 2 miles from their nearest or catchment school and for those who are 8 and over. However the route from Cedars Park to Trinity is currently deemed to be unsafe and so free travel would be provided to those who live under the 2 or 3 miles distance when this would be the shortest walking route.

Of the total primary age pupils forecast to arise from phase 3D, SCC can assume 2 pupils will arise in both reception and in year 1 - 4, and 1 pupil will arise in groups 5 and 6 which would mean that over 7 years a total cost of £39,750 will arise in terms of additional school transport costs due to no surplus places being available at Cedars Park Community Primary School.

These will form a site specific mitigation which will be covered by a planning obligation. An alternative solution would be to provide a safer route to the school which would also be considered site specific mitigation. Instead of the

contribution being spent on providing free school transport for children arising from the scheme, SCC could spend the contribution on delivering a safe walking & cycling route between the development and Trinity if such an improvement can be made. This project is currently being explored.

Based on existing forecasts SCC will have no surplus places available at the catchment secondary school to accommodate any of the pupils arising from this scheme and SCC will require CIL contributions towards providing additional education facilities as defined in the table above.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

Through the Childcare Act 2016, the Government will be rolling out an additional 15 hours free childcare to eligible households from September 2017.

	Minimum number of eligible children:	Required:	Cost per place £ (2016/17):
Pre-School age range, 2-4:	5	5	6,091

Required pre-school contributions:	<b>£30,455.00</b>
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In the Ward of Stowmarket North there is a predicted deficit of places – 304 places in September 2017. There are 4 childminders and 4 early years providers. Therefore there are no providers in this locality with sufficient spaces available to accommodate the children arising from the development.

- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
- In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
  - Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
  - Local neighbourhoods are, and feel like, safe, interesting places to play.

d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be co-ordinated by Christopher Fish of Suffolk County Highway Network Management.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002). The guidance can be viewed at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/2015-11-16-FINAL-2015-Updated-Suffolk-Guidance-for-Parking.pdf>

5. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

Using the established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent at the local catchment library and allows for improvements and enhancements to be made to library services and facilities, and outreach activity.

Libraries contribution:	<b>£10,368.00</b>
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6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste

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

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

Waste Contribution:

£ 0.00

- 7. Supported Housing.** Section 6 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, may need to be considered as part of the overall affordable housing requirement. 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 Mid Suffolk housing team to identify local housing needs.
- 8. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Additionally, and more widely, when considering major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

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

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



The changes set out in the MWS took effect from 06 April 2015.

- 9. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

**10. Superfast broadband.**

SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion, it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability.

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

- 11. Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.
- 12. Time Limits.** The above information is time-limited for 6 months only from the date of this letter.

#### 14. Summary Table

<b>Service Requirement</b>	<b>Contribution per dwelling</b>	<b>Capital Contribution</b>
Education - Primary	£1,087.00	£52,176.00
Education – Secondary	£3,441.56	£165,195.00
Education – Sixth Form	£829.46	£39,814.00
Pre-School	£634.48	£30,455.00
Transport		
Libraries	£216.00	£10,368.00
Waste	£0.00	£0.00
<b>Total</b>	<b>£6,208.50</b>	<b>£298,008.00</b>

The table above would form the basis of a future bid to the District Council for **CIL funds** if planning permission is granted and implemented. This will be reviewed when a reserved matters application is submitted.

<b>Service Requirement</b>	<b>Contribution per dwelling</b>	<b>Capital Contribution</b>
Education travel contributions/safer route to school	£828.13	£39,750.00
<b>Total</b>	<b>£828.13</b>	<b>£39,750.00</b>

The contribution in the table above is requested as a planning obligation under Section 106 to provide contributions to education travel/safer route to school.

Yours sincerely,

*P J Freer*

Peter Freer MSc MRTPI  
Senior Planning and Infrastructure Officer  
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC

OFFICIAL



**Suffolk Fire and Rescue Service**

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

Mid Suffolk District Council  
Planning Department  
131 High Street  
Needham Market  
Ipswich  
IP6 8DL

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: 12 December 2016  
**Planning Control  
Received**  
15 DEC 2016  
Acknowledged .....  
Out: .....

**Planning Ref: 4556/16 + S106**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land to the south side of Gun Cotton Way, Stowmarket IP14 5EP**  
**DESCRIPTION: 48 Dwellings + 3 Commercial**  
**NO: HYDRANTS POSSIBLY REQUIRED: Required**

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

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

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

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

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

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

Continued/

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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



Mrs A Kempen  
Water Officer

Enc: PDL1

Copy: Mr P McIntosh, Melville Dunbar Associates, Mill House, Kings Acre, Coggeshall  
CO6 1NY

Enc: Sprinkler information

[Planningcontributions.admin@suffolk.gov.uk](mailto:Planningcontributions.admin@suffolk.gov.uk)

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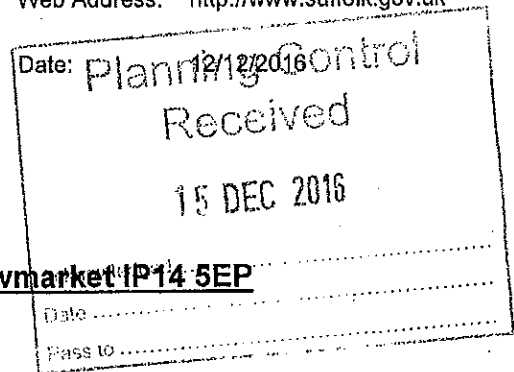


**Suffolk Fire and Rescue Service**

Mid Suffolk District Council  
Planning Department  
131 High Street  
Needham Market  
Ipswich  
IP6 8DL

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

Your Ref: 4556/16 + S106  
Our Ref: FS/F221361  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>



Dear Sirs

**Land to the south side of Gun Cotton Way, Stowmarket IP14 5EP**  
**Planning Application No: 4556/16 + S106**

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Continued/

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

Yours faithfully

A large black rectangular redaction box covering the signature of Mrs A Kempen.

Mrs A Kempen  
Water Officer

## Rebecca Biggs

---

**From:** Jason Skilton  
**Sent:** 19 June 2017 11:53  
**To:** X Delete Aug 17 - Planning Emails  
**Cc:** Rebecca Biggs  
**Subject:** 2017-06-19 JS Reply 4556/16 Phases 3D Cedars Park Land South Of Gun Cotton Way Stowmarket IP14 5EP

Dear Rebecca Biggs,

**Subject: 4556/16 Phases 3D Cedars Park Land South Of Gun Cotton Way Stowmarket IP14 5EP**

Suffolk County Council, Flood and Water Management have reviewed application ref 4556/16

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

1. Site layout plan dwg 1467-3D-P001
2. Flood Risk Assessment Site 3A, 3B, & 3D Cedars Park, Stowmarket & appendixes ref 45391 No 2016
3. Site 3D Drainage Strategy 45391/C/10
4. Pre Planning Assessments AWS Dated 18 & 19 Oct 2016
5. Maintenance Schedule Ref 45391 Cedars Park Sited 3A,3B & 3D
6. Typical Preliminary Construction Details dwg 45391-C-015

We propose the following condition in relation to surface water drainage for the **full** element of the application.

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated Nov 2016, ref: 45391) shall be implemented as approved in writing by the local planning authority. The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

2. The 22nd dwelling hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

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

3. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

*Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.*

We propose the following condition in relation to surface water drainage for the **outline** element of the 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. 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;
  - c. 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;
  - d. 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;
  - e. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
2. The scheme shall be fully implemented as approved.

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

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

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

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

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

5. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

*Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.*

#### Informatives

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

Kind Regards



Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Rebecca Biggs, Development Management

FROM: David Harrold, Environmental Protection Team    DATE: 14/06/2017

YOUR REF: 4556/16/HYB

SUBJECT: Land South of Gun Cotton Way, Stowmarket. EH – Other Issues

---

Thank you for consulting me on the above hybrid application for the erection of 48 dwellings and 3 commercial units. In respect of "other" environmental issues I would like to comment on noise and odour impacts.

**Noise:**

I note the noise assessment report by Loven Acoustics (LA) dated 28 October 2016. The report by LA considers environmental noise from existing road traffic and current commercial operations together with predicted noise levels from the proposed A3/A4 operations to determine the suitability of the site for both residential and commercial development.

The assessment of noise levels was carried out with reference to World Health Organisation guidelines and British Standard 4142 which is reasonable and robust.

The report concludes that providing residential dwellings have window glazing constructed to the specification in table 6 and an acoustic barrier is constructed as indicated in Figure 3 of Appendix 2, there will be no adverse noise impact on residential occupiers.

I would therefore recommend that this is made a condition of any planning permission should approval be granted.

I am aware of the representation by neighbouring commercial activity, Ciimax Molybdenum (CM) and the activities they carry out. I am unable to advise you on this as enforcement responsibility for this site rests with the Environment Agency by way of permit under the Environmental Protection Act, and I would advise that you may wish to consult the Agency on this. I can advise that I am unaware of any local noise issues in respect of CM activities which I would construe equally impact on existing residential premises off Gun Cotton Way.

**Odour**

The proposed site is close to Stowmarket Sewage Treatment Works and an odour assessment has been carried out by REC dated October 2016. Odour emission details have been provided by Anglian Water, and using industry guidance, the odour impacts across the proposed development quantified by dispersion modelling. The results of modelling indicate that it is not anticipated that significant odour impacts occur at any of the residential or other sensitive locations. It is widely accepted that a contour of 3 odour units (ou) expressed as a 98<sup>th</sup> percentile (2% of the time spread throughout a year) is acceptable and unlikely to cause complaint. The dispersion modelling indicates odour concentrations are below 1.5 ou across the entirety of the site and below 1 ou at the nearest residential dwellings. I do not, therefore, have any adverse comments in respect of odour issues.

Should you require any further advice or require assistance in drafting an appropriate noise condition as indicated above, please do not hesitate to contact me.

David Harrold  
Senior Environmental Health Officer



**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](mailto:planningee@highwaysengland.co.uk)

To: Mid Suffolk District Council

CC: [growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 4556/16

Referring to the planning application referenced above, dated 30 November 2016, application for the erection of 48 dwellings and outline planning permission for 3 commercial units with appearance and individual plot landscaping as reserved matters, Phase 3D Cedars Park, land South of Gun Cotton Way, Stowmarket, IP14 5EP, 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.<sup>1</sup>

---

<sup>1</sup> Where relevant, further information will be provided within Annex A.

**From:** Consultations (NE) [mailto:consultations@naturalengland.org.uk]  
**Sent:** 08 December 2016 11:16  
**To:** Planning Admin  
**Subject:** Consultation Response 202829 - 4556/16

Dear Sir/Madam

Application ref: 4556/16  
Our Ref: 202829

**Natural England has no comments to make on this application.**

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England.

Yours faithfully

David Allcock  
Natural England  
Consultations Team  
Hornbeam House  
Crewe Business Park  
Electra Way,  
Crewe  
Cheshire, CW1 6GJ

Tel: 0300 060 3600

Place Services  
Essex County Council  
County Hall, Chelmsford  
Essex, CM1 1QH  
T: 0333 013 6840  
www.placeservices.co.uk  
@PlaceServices



Planning Services  
Mid Suffolk District Council,  
131 High Street,  
Needham Market,  
Suffolk IP6 8DL

16/01/2017

For the attention of: Rebecca Biggs

**Ref: 4556/16; Phase 3D Cedars Park, land South of Gun Cotton Way, Stowmarket**

Thank you for consulting us on the hybrid planning application for of full planning permission for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class A3, 1 no. Class A4 and 1 no. Class A3/A5) with 'appearance' and individual plot landscaping as reserved matters land South of Gun Cotton Way, Stowmarket.

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

### **Recommendations**

In terms of the likely visual impact on the surrounding landscape, the proposals are located on a development site which links the existing developed area of Cedars Park with the industrial hinterland of northern Stowmarket and the A1120 to the east.

From a landscape impact point of view the proposed development sites will have an insignificant impact due to the site forming part of a wider allocated strategic development area. However, the proposals need to clearly demonstrate a comprehensive landscape vision for the site to both create a suitable, high quality new development whilst mitigating the impact development will have on the adjacent residential areas to the north and limiting views to the industrial areas to the south.

In regard to landscaping and in the interest to visual amenity, the following planning conditions are recommended for each of the two sites:

- 1) Detailed soft landscape planting plan and specification
- 2) Boundary treatment plan and specification
- 3) Hard landscape materials plan and specification
- 4) Landscape management plan

### **The proposal**

The application plans set out the proposals for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class A3, 1 no. Class A4 and 1 no. Class A3/A5) with 'appearance' and individual plot landscaping as reserved matters. The site is located on a gap site between the residential edge of the existing Cedars Park development and the northern edge of the adjacent industrial areas to the south.



**Review on the submitted information**

Relevant to this landscape review, the submitted application includes a landscape proposal for both the full and outline application elements of the development site. The proposals outline the landscape concepts but fail to adequately provide the necessary level of detail needed to approve the landscape elements of the application.

It is noted that the two sites are indicated as employment land as part of the development framework masterplan for Cedars Park dated 1999. Residential uses on the site will require a greater level of landscaping and appropriate boundary treatment between the existing industrial uses and the site boundary. Appropriate specification and detailed plans should be included within the submitted landscape plans.

The submitted detailed plans for the 3 commercial units need to provide appropriate levels of landscaping to both the internal areas of the site as well as the site boundary especially along the site edge to the A1120.

Yours sincerely,

Peter Dawson BA(hons) DipLA  
Principal Consultant Landscape Architect  
Telephone: 03330136861  
Email: peter.dawson@essex.gov.uk

N.B. This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to the particular matter.

Midlands & East (East)  
Swift House  
Hedgerows Business Park  
Colchester Road  
Chelmsford  
Essex CM2 5PF

Email address: [kerryharding@nhs.net](mailto:kerryharding@nhs.net)  
Telephone Number – 0113 824 9111

Your Ref: 4555/16 and 4556/16  
Our Ref: NHSE/MIDS/16/4555/KH

Planning Services  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market, IP6 8DL

14 December 2016

Dear Sirs,

**Phases 3A & 3C Cedars Park, land South of Gun Cotton Way, Stowmarket.**  
**Phase 3D Cedars Park, land South of Gun Cotton Way, Stowmarket.**

1. I refer to your consultation letters on the above planning applications and advise that, following a review of the applicants' submissions the following comments are with regard to the Primary Healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating Ipswich and East Suffolk Clinical Commissioning Group (CCG).

**Background**

2. This response relates to two different planning applications, however, as they are located on the same site, NHS England is providing a combined response. The proposals comprise of a development totalling 191 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

**Review of Planning Application**

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

**Healthcare Impact Assessment**

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

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

**Table 1: Summary of capacity position for healthcare services within a 2km radius of (or closest to) the proposed development.**

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
Stow Health	17,389	1000.00	14,583	-192.39
Combs Ford Surgery	8,450	378.50	5,520	-200.93
<b>Total</b>	<b>25,839</b>	<b>1,378.50</b>	<b>20,103</b>	<b>-393.32</b>

**Notes:**

1. The weighted list size of the 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 120m<sup>2</sup> per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
  4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment, extension, or relocation at Combs Ford surgery would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to reconfigure the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

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

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



Yours faithfully



**Kerry Harding**  
Estates Advisor

**From:** Nathan Pittam  
**Sent:** 27 January 2017 09:34  
**To:** Planning Admin  
**Subject:** 4556/16/HYB. EH - Air Quality Issues.

**M3 : 187254**  
**4556/16/HYB. EH - Air Quality Issues.**  
**Land south of, Gun Cotton Way, STOWMARKET, Suffolk.**  
**Phase 3D Cedars Park. Hybrid planning application consisting of full planning permission for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class ...**

Many thanks for your request for comments in relation to the above application. I can confirm that I have no objections to the proposed development from the perspective of air quality issues. Given the scale of the development and the relatively low background concentrations within the vicinity I can confirm that the likelihood of the development comprising local air quality is very low.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer  
**Babergh and Mid Suffolk District Councils – Working Together**  
t: 01449 724715  
m: 07769 566988  
e: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** Iain Farquharson  
**Sent:** 19 December 2016 12:06  
**To:** Planning Admin  
**Subject:** Gun Cotton way 3a 3c 3d. Application number 4555/16 4556/16

M3 187246  
M3 187255

Sir/Madam

These applications have been discussed with the applicants agent on the 6<sup>th</sup> December 2016 and the following points clarified

1. The interpretation of the 1000m2 threshold for renewable energy provision *does* apply to these applications, the total property within the application exceeds the threshold and so 10% of the predicted energy requirement must be supplied from renewable technology.
2. Details of the sustainable construction measures are required for the commercial premises
3. The environmental credentials of the eventual occupant cannot form part of the consideration. Occupants can easily change also the policies and procedures of occupants can alter. Neither occupants nor their policies are regulated by the planning system.
4. We would like to see some sustainability credentials of the residential elements.

Further information has not been received as of 19/12/16 and so the recommendation is for refusal as council policy has not been sufficiently addressed.

Iain Farquharson

Environmental Management Officer  
Babergh Mid Suffolk Council

☎ 01449 724878

✉ [iain.farquharson@baberghmidsuffolk.gov.uk](mailto:iain.farquharson@baberghmidsuffolk.gov.uk)



# SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp  
Design Out Crime Officer  
Bury St Edmunds Police Station  
Suffolk Constabulary  
Raynigate Street, Bury St Edmunds  
Suffolk  
Tel: 01284 774141  
[www.suffolk.police.uk](http://www.suffolk.police.uk)

**Planning Application (4556/16)**

**SITE: 48 Dwellings and 3 commercial units, namely a Costa Coffee, McDonalds and Marston's Public House, Gun Cotton Way, Cedars park, Stowmarket, IP14 5EP**

**Applicant: Melville Dunbar Associates**

**Planning Officer: Ms Rebecca Biggs**

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

Dear Ms Biggs

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of 48 residential properties and 3 commercial units, namely a Costa Coffee, MacDonald's and Marston's Public House on Gun Cotton Way, Cedars Park, Stowmarket.

On behalf of Suffolk Constabulary I have no objections to the proposals in their current form. However, this area with the large supermarket car park and the convenient access to the near-by dual carriage way into Stowmarket and the A14, has historically and repeatedly suffered from Anti-Social Behaviour from Boy Racers/Car Cruising, which Suffolk Police on numerous occasions have been called out to deal with.

As the problem has been so acute the supermarket erected a security barrier, to block off their main car park and prevent Anti-Social Behaviour from occurring.

While this proposed car parking area is in now-way as large as that of the supermarket area, I have concerns this too could become an area for Anti-Social Behaviour and Boy Racers/Car Cruising in particular to congregate, I would therefore strongly recommend a securable barrier is placed by the proposed entrance to the three commercial units and securely closed after trading hours.

I would also recommend a suitable Automated Number Plate Reader (ANPR) camera is installed at the entrance to monitor activity and act as a good reassurance measure to valid users of the site and act as an evidence gathering feature.

I have concerns over the permeability of too many access pathways between plot 18, plots 23 and 24 and plots 30 and 31, which I believe would act as crime generators for offenders to freely come and go around the area. I would like to see these areas secured with 1.8m high lockable gates, or at the very least monitored by kissing gates in line with BS5709 standard.

NOT PROTECTIVELY MARKED  
RESTRICTED/CONFIDENTIAL

I also have concerns as to the security for the rear of the site which I believe will be fenced off. I would ideally like to see 2 metre welded mesh fencing, or 1.8m boarded fencing along this rear perimeter.

One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

**A safe community:** Protect the environment from pollution, flooding and other natural and man-made disasters; **reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.**

Section 17 outlines the responsibilities placed on local authorities to prevent crime and disorder.

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

- 1.1 vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, well used and should not undermine the defensible space of neighbourhoods. Design features can help to identify the acceptable routes through a development thereby encouraging their use and in doing so enhance the feeling of safety.
- 1.2 There are advantages in some road layout patterns over others, especially where the pattern frustrates the searching behaviour of the criminal and his need to escape. Whilst it is accepted that through routes will be included in developments such as this, the designers must ensure that the security of the development is not compromised by excessive permeability, for instance allowing an offender legitimate criminal access to the rear or side boundaries of a dwelling, as is the case in the design.
- 1.4 Developments that enhance the passive surveillance of the area by the residents from their homes and which incorporate high levels of street activity have both been proven to influence a criminal's behaviour and deflect them elsewhere.
- 1.5 To the planners credit the majority of the proposed plan has been designed so that there will be natural surveillance of both properties and vehicle parking as preferred by police Secure By Design principles. It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling for residents and passers-by.

## **2. General layout of the proposed plan**

- 2.1 For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.
- 2.2 From the plans seen it would appear that a number of the properties will have gable end windows that look onto public spaces, which is a police preferred preference of design that allows natural surveillance of the area to reduce the risk of graffiti, other forms of criminal damage, or inappropriate loitering. Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.

- 2.3 I would refer the developers to SBD 2016, page 18 on "Dwelling Boundaries", which outlines the importance of how the boundary between public and private areas should be clearly indicated.
- 2.4 **There are five main reasons for providing a perimeter boundary fence:**
- a) To mark a boundary to make it obvious what is private and public property.
  - b) Provide safety for employers and employees.
  - c) Prevent casual intrusion by trespassers.
  - d) Prevent casual intrusion onto the site by criminals.
  - e) Reduce the wholesale removal of property from the site by thieves.
- 2.5 The gates to the side or rear of dwellings that provide access to rear gardens, should be of robust construction and be the same height of the fence line at a minimum height of 1.8m and be capable of being locked (operable by key from both sides of the gate and a good quality mortise lock is preferred). SBD 2016, Pages 18-19, Paras 10.3 – 10.5.12 refers.
- 2.6 As previously stated I have serious concerns at the permeability which has been proposed between plot 18, plots 23 and 24 and plots 30 and 31, which I believe would act as crime generators for offenders to freely come and go around the area. I would like to see these areas secured with 1.8m high lockable gates, or at the very least monitored by kissing gates in line with BS5709 standard.
- 2.7 Where extra access paths are essential they should be gated with the gates at the entrance of the footpath as near to the front building line as possible. The gates should have a key operated lock, operable from both sides. The gates must not be easy to climb over or remove from their hinges. Where possible the street lighting scheme should be designed to ensure the gates are well illuminated and recommendation for a lux plan to be provided.

### 3.0 Outer Perimeter

- 3.1 As initially stated I have concerns as to the security at the rear of the site. I would ideally like to see 2 metre high welded mesh fencing, or 2m high boarded fencing along this rear perimeter.
- 3.2 Installing fencing to a high standard will ensure the security and longevity of the boundary. A high quality fence that lasts for a long time will provide security and reduce overall maintenance costs. Further details on Secure By Design (SBD) fencing can be found at page 19 of SBD New Homes 2016, Paras 10.5-10.5.6

### Footpaths

- 3.1 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. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. There is no blanket approach, site specifics apply, based on the crime rate and local context. Research from across the United Kingdom shows that 85% of house burglaries occur at the rear of a property.
- 3.2 Routes for pedestrians, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime along with Anti-Social Behaviour. Where a suggested footpath is unavoidable, such as along 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. If possible it would assist for that area to also be well lit. (SBD 2016, pages 14-17, at Paras 8.1-8.19).

- 3.4 Footpaths that include lighting should be lit to relevant levels as defined by BS 5489:2013.

#### 4. Lighting

- 4.1 I cannot comment on the lighting as there are no details submitted on the plans. However, I would recommend photocell operated wall mounted lighting at the front of all household dwellings, (on a dusk to dawn light timer) complete with a compact fluorescent lamp and wired through a switched spur to allow for manual override. I would also appreciate viewing a "Lux" lighting plan of the proposed site.

- 4.2 Lighting should conform to the requirements of BS 5489:2013. A luminaire that produces a white light source (Ra>59 on the colour rendering index) should be specified but luminaires that exceed 80 on the colour rendering index are preferred.

#### 5. Car Parking

- 5.1 The layout of the plans allows natural surveillance of the parking areas, which is commendable.

- 5.2 Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.

#### 6. Communal Areas/ Public Open Space

- 6.1 **Communal Areas/Public Open Space:** The development could include one or more open spaces. If that should be the case I would recommend metal knee-rail hoop fencing for the perimeter of each area. Section 9, SBD 2016, provides further details around Communal areas in order to reduce the potential for ASB and Criminal Damage issues.

- 6.2 Should any play equipment be installed it should meet **BS EN 1176** standards and be disabled friendly. I Would recommend that any such area has suitable floor matting tested to **BS EN1177** standards.

- 6.3 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.

- 6.4 All litter bins should be of a fire retardant material.

- 6.5 The Fields Trust Planning and Design for Outdoor Sport and Play introduced 2008 and The Association of Play Industries Adult Outdoor fitness Equipment Standards also offer further guidance.

#### 7. Further Recommendations in General

- 7.1 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that

the installed items are fit for purpose.

7.2 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).

7.3 I note from the plans that there is a proposal to plant a number of trees, which will also assist with drainage. Trees should allow, when mature, crown lift with clear stem to a two metre height. Similarly, shrubbery should be selected so that, when mature, the height does not exceed 1 metre, thereby ensuring a one metre window of surveillance upon approach whether on foot or using a vehicle.

## 8.0 **Three Commercial Business Units**

8.1 As I do not have the full details of the design for these units I am unable to comment further, however, I strongly recommend the units are designed along Secure By Design guide lines, through SBD commercial 2015 Version 2, as per this link.  
[http://www.securedbydesign.com/wp-content/uploads/2015/05/SBD Commercial 2015 V2.pdf](http://www.securedbydesign.com/wp-content/uploads/2015/05/SBD_Commercial_2015_V2.pdf)

## 9.0 **External and Shell aspects of Business Buildings**

9.1 **Door-Set Apertures** It is important that the door-set aperture is protected. The door security should meet the following minimum standards:

- PAS 24:2012
- LPS 1175: Issue 7, SR2
- STS 201 or STS 202: Issue 3, BR2

9.2 **Recessed doorways** should, where possible, be avoided as they provide opportunities for crime and anti-social behaviour i.e. graffiti, arson and burglary. In the event that the building design or location requires such recesses efforts should be made minimize such negative consequences. This may include a requirement for higher security rated door-sets, door-sets and surrounding building material to be fire retardant and anti-graffiti surface treatments to be applied to both. (Further details can be obtained in SBD Commercial 2015 V2 at page 43 Sec 56 Para 56.1 – 56.11).

9.3 **Building Composition** Where lightweight construction is being considered, for example the use of insulated sheet cladding, a reinforced lining such as welded steel mesh can enhance the security of the building fabric. On certain industrial sites some buildings become prone to criminal attack through the wall, bypassing security doors and shutters. The walls should be designed to withstand such attacks and materials resistant to manual attack or damage should be used to ensure the initial provision of security.

9.4 **Roller shutters and grilles** Grilles and shutters can provide additional protection to both internal and external doors and windows. The minimum standard for such products, when required, is certification to

- LPS 1175: Issue 7 Security Rating 1 Or
- STS 202: Issue 3, Burglary Rating 1

9.5 **Security glazing** All ground floor and easily accessible glazing must incorporate one pane of laminated glass to a minimum thickness of 6.4mm or glass successfully tested to BS EN 356:2000 *Glass in building. Security glazing - resistance to manual attack* to category P1A unless it is protected by a roller shutter or grille. With effect from 1<sup>st</sup> January 2014 the Secured by Design requirement for all laminated glass in commercial premises will be certification to BS EN 356 2000 rating P1A unless it is protected by a roller shutter or grille.



- 9.6 **Lighting** As stated, as there is no lighting plan I cannot at this stage fully comment. However, I note from previous planning requests for Marston's establishments there has been an emphasis on bollard lighting, which is ineffectual. Instead it is preferred that 5m Thorn lighting columns are strategically placed around the site to give good all round visibility. With a good concentration of light focused on distribution areas.
- 9.7 **CCTV and Intruder alarms systems** A suitably designed, fit for purpose, monitored CCTV system and monitored intruder alarm system should be installed at each unit. For police response, the system must comply with the requirements of the Security Systems policy, which can be found at [www.securedbydesign.com](http://www.securedbydesign.com)
- 9.8 System designers may wish to specify component products certificated to the following standards:
- LPS 1602 Issue 1.0: 2005 Requirements for LPCB Approval and Listing of Intruder Alarm Movement Detectors
  - LPS 1603 Issue 1.0: 2005 Requirements for LPCB Approval and Listing of Alarm Control Indicating Equipment
- (Further details can be obtained in SBD Commercial 2015 V2 at page 49 Sec 64 Para 64.1 – 64.2).
- 9.9 I strongly recommend CCTV coverage for within the main car park areas and within the main entrance to the establishments, to assist in the prevention of crime and reassure visitors that management take their safety and security seriously. The cameras should be of a design that they are able to capture good quality facial images of anyone entering the area.
- 9.10 Any CCTV system should be registered with the Information Commission Office (ICO) at <https://ico.org.uk/for-organisations/>
- 9.11 CCTV systems must be installed to BSEN 50132-7:2012+A1:2013. Further information on CCTV can be obtained in SBD Commercial 2015 V2 at page 38 Sec 49 Para 49.1 – 49.10.
- 10.0 **Vehicle Parking for Staff**
- 10.1 In line with Suffolk Guidance for Parking and Secure by Design principles secure motorcycle, moped and scooter parking should be available for staff. Such parking provision should benefit from surveillance from within the complex and through formal CCTV coverage.
- 10.2 It is desired that the design criteria for the proposed car parks should follow the principles laid down in the police owned 'ParkMark' initiative. <http://www.parkmark.co.uk/> (Further details can be obtained in SBD Commercial 2015 V2 at page 18 Sec 20 Para 20.6 – 20.7).
- 10.3 Secure bicycle parking should be provided in view of the main complexes with stands to which the bicycles can be secured. In order to encourage cycling to work and therefore reduce car journeys, it is recommended that the cycle parking provision is contained within a securable, roofed building. The building should be lit and secured during operating hours. The securing of cycles left unattended must be considered within the design of any new commercial premises. The cycle stand must facilitate the locking of both wheels and the crossbar.
- 10.4 Minimum requirements for such equipment are:
- Galvanised steel bar construction (minimum thickness 3mm) filled with concrete
  - Minimum foundation depth of 300mm with welded 'anchor bar'.

include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

**12.6** It is now widely accepted a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of that development.

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

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

The applicant can also enter into a **pre-build agreement** and make use of the Award in any marketing or promotion of the development. The current "New Homes 2016" guide and application forms are available from [www.securedbydesign.com](http://www.securedbydesign.com) which explains all the crime reduction elements of the scheme.

**In conclusion as stated I have no objections to the plan in its current format, but as stated I do have concerns that the entrance to the three business units will bring about Anti-Social Behaviour from Boy Racers/Car Cruising, for which previous experience has shown Suffolk Police have been called out to deal with on numerous occasions at the nearby supermarket, that resulted in security measures being added by closing the whole of the car park area shortly after closing time. I would therefore strongly recommend a barrier is placed at the entrance by the proposed entrance to the three commercial units and secured after trading hours and an ANPR camera is strategically placed at the main entrance for these units to record all vehicles entering the area.**

**I also have concerns over the permeability of too many access pathways between plots 23 and 24 and 31 and plot 18, which I believe would act as crime generators for offenders to freely come and go around the area. I would like to see these areas secured with either lockable gates or at the very least kissing gate barriers.**

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

Yours sincerely



Phil Kemp

Designing Out Crime Officer  
Western and Southern Areas  
Suffolk Constabulary  
Raynegate Street  
Bury St Edmunds  
Suffolk  
IP33 2AP

## Rebecca Biggs

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**From:** Rebecca Biggs  
**Sent:** 30 November 2016 12:20  
**To:** Infrastructure Team (Babergh Mid Suffolk)  
**Subject:** RE: Consultation on Planning Application 4556/16

**Categories:** Egress Switch: OFFICIAL (Not Encrypted)

**From:** Infrastructure Team (Babergh Mid Suffolk)  
**Sent:** 29 November 2016 14:02  
**To:** Planning Admin  
**Cc:** Rebecca Biggs  
**Subject:** RE: Consultation on Planning Application 4556/16

Dear Rebecca,

I have reviewed this application in terms of developer contributions. As this is not a strategic site the residential new build, if granted, would attract a CIL liability of £50sqm. The A3, A4 and A3/A5 Development, if granted, will attract a CIL Liability of £0sqm. Please could you ensure that the CIL Additional Information Form for this development is submitted to the Infrastructure Team.

Kind Regards,

Nicola

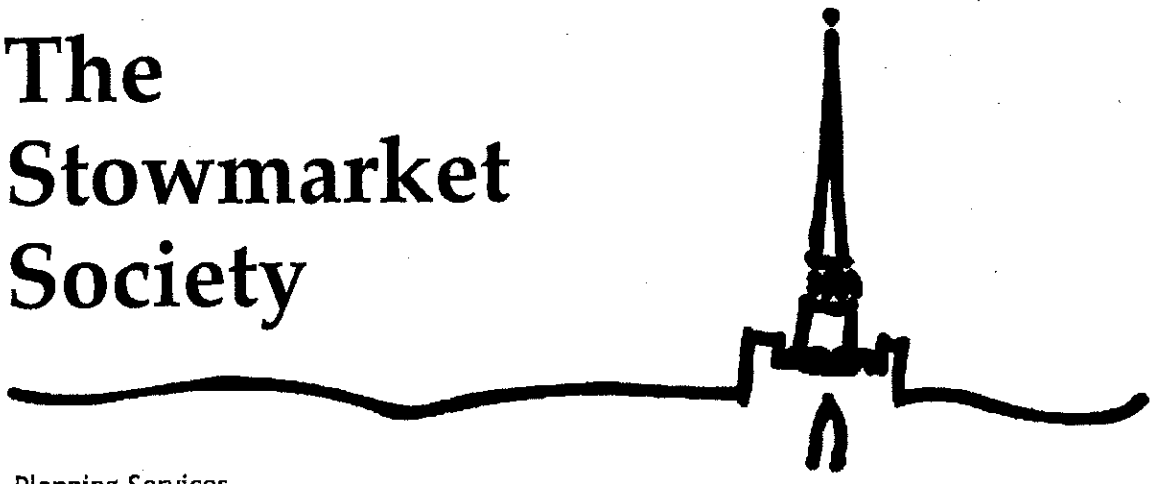
**Infrastructure Team**  
Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724563

**\*\*\* Community Infrastructure Levy (CIL) is now adopted in Mid Suffolk and Babergh. Charging started on 11th April 2016. See our websites for the latest information here: [CIL in Babergh](#) and [CIL in Mid Suffolk](#) \*\*\*\***

4555/16 &  
4556/16

# The Stowmarket Society



Planning Services  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Ipswich  
IP6 8DL

MID SUFFOLK DISTRICT COUNCIL PLANNING CONTROL RECEIVED	
22 DEC 2016	
ACKNOWLEDGED .....	
DATE .....	RB
PASS TO .....	

19 December 2016

Dear Sirs

4555/16 - Phases 3A & 3C Cedars Park, land South of Gun Cotton Way, Stowmarket  
Erection of 143 dwellings and 15 Class B1 units.

4556/16 - Phase 3D Cedars Park, land South of Gun Cotton Way, Stowmarket, IP14 5EP -  
Hybrid planning application consisting of full planning permission for the erection of 48  
dwellings and outline planning permission for 3 commercial units (1 no. Class A3, 1 no.  
Class A4 and 1 no. Class A3/A5) with 'appearance' and individual plot landscaping as  
reserved matters.

We OBJECT to these applications on the grounds that

- The site is part of a strategic allocation for employment land. It was meant to form part of a mixed use development on the edge of the town. The high-revenue earning parts of that development (housing, supermarket) have occurred but everything else has struggled, as landowners manoeuvre to maximise capital value. The only thing that can ensure that all community needs are met is the planning system, and there is no clear evidence that the original needs either no longer exist or will be met adequately elsewhere.
- We note mention is made of the Mill Lane employment development proposals. Whilst these have a planning permission, they have not commenced, and may never do so. Perhaps the owners of that site too, will prefer to bide their time and then seek residential development? The Gun Cotton Way sites are serviced and ready for development, the only thing standing in the way of their development is a perceived opportunity for a higher value residential development.
- The employment allocations in Gun Cotton Way relate closely to the railway station and the town centre bringing benefits that cannot be achieved at Mill Lane.

- The employment use of these sites would also act as a shield to existing long established unneighbourly uses on the Tomo estate, as well as the Climax Molybdenum factory. This shows the wisdom of the original land use allocation.

We would also make the following points for your consideration:

- We do not think it possible to object to the quasi-retail elements proposed within phase 3D. They will offer some services to the residents of Cedars park in particular, and Stowmarket as a town is now large enough to support them.
- The general standard of layout and architecture is good. Is this what would be built or will the land then be sold on to Crest or Bovis for more of what we already have, which is not so good?
- Notwithstanding this general point about quality, we find the New England style of the residential element of Phase 3D to be overly artificial, overbearing and somewhat Disneyesque. Some boarded buildings within a development of varied facing materials would relate more to the vision of the Suffolk Residential Design Guide, and to the local vernacular.
- The submissions state that the development on phase 3D cannot afford the full quota of affordable housing. No justification for this assertion is in the public domain. We find the assertion incredible. The land was last used as farmland and has no undue development constraints. The uplift in value from that to residential value is enormous. How can these sites, of all the possible sites that come before a planning authority, not afford proper social housing? If that really is the case then a full policy compliance in this respect will not be achieved anywhere.
- We note that so far as application 4555/16 is concerned, the documents on your website on 17/12/16 do not include a Design and Access statement, and the Planning Statement referred to is in fact the one for application 4556/16. We assume the developer cannot afford a full policy compliance re affordable housing on this site either.

We trust that the above points will be taken into account.

Yours faithfully



M Smith Chairman



29 June 2017

Rebecca Biggs  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market  
Ipswich IP6 8DL

By email only

Dear Rebecca

**Application: 4556/16**

**Location: Phase 3D Cedars Park, land South of Gun Cotton Way, Stowmarket IP14 5EP**

**Proposal: Hybrid planning application consisting of full planning permission for the erection of 48 dwellings and outline planning permission for 3 commercial units (1 no. Class A3, 1 no. Class A4 and 1 no. Class A3/A5) with 'appearance' and individual plot landscaping as reserved matters.**

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

**No objection subject to conditions to secure ecological mitigation and enhancements.**

There is now sufficient ecological information available to understand the impacts of development on Priority Habitats eg hedgerows and Priority species, particularly reptiles.

Although the recently submitted ecology statement is unsigned so its source is not clear, I welcome the confirmation that hedgerows (Priority habitat) will be retained and enhanced within the development. I agree that a reptile mitigation strategy will be needed for this application Phase 3D (as well as the adjacent Phases 3A & 3C application) as a condition of any consent.

Please note that the Wildlife Protection Area identified in both documents is still designated as a County Wildlife Site (CWS) and the detailed methodology for creating a SuDS detention area within the CWS should be agreed in advance with Suffolk Wildlife Trust and recommendations secured as part of any consent.

**Recommendations**

The mitigation measures identified in the Cedars Park Ecological Management Plan (Applied Ecology, Feb 2015) and Ecological report (Applied Ecology, April 2017) should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, reptiles, hedgehogs and breeding birds.

Impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.



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

**I. PRIOR TO COMMENCEMENT: COMPLIANCE WITH ECOLOGICAL REPORT RECOMMENDATIONS**

*"All ecological mitigation and enhancement measures and/or works shall be carried out for Phase 3D, in accordance with the details contained in the Cedars Park Ecological Management Plan (Applied Ecology, Feb 2015) and ecological [update] report (Applied Ecology, April 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination".*

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

**II. PRIOR TO COMMENCEMENT: REPTILE MITIGATION STRATEGY**

*"A reptile mitigation strategy shall be submitted and approved in writing by the local planning authority and implemented in full. This should include a method statement to deliver all the mitigation measures and suitable enhancement measures to avoid impacts on reptiles (Protected species).*

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

**III. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME**

*"Prior to occupation, 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 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."*

Please contact me with any queries.

Best wishes

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

Principal Ecological Consultant

Place Services at Essex County Council

[sue.hooton@essex.gov.uk](mailto:sue.hooton@essex.gov.uk)

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

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