

Midlands & East (East)
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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 ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|--------------------|---------------------------------|------------------------------------|-----------------------|---|
| Stow Health | 17,389 | 1000.00 | 14,583 | -192.39 |
| Combs Ford Surgery | 8,450 | 378.50 | 5,520 | -200.93 |
| Total | 25,839 | 1,378.50 | 20,103 | -393.32 |

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 120m² 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: 26 January 2017 14:00
To: Planning Admin
Subject: 4555/16/FUL. EH - Air Quality.

M3 : 187247
4555/16/FUL. EH - Air Quality.
Land south of, Gun Cotton Way, STOWMARKET, Suffolk.
Phases 3A & 3C Cedars Park. Erection of 143 dwellings and 15 Class B1 units.

Many thanks for your request for comments in relation to the above application. Having reviewed the Air Quality Assessment produced by REC (ref. AQ102003R1) 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
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w: www.babergh.gov.uk 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 6th 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

Rebecca Biggs

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 06 July 2017 09:13
To: Rebecca Biggs
Subject: FW: Consultation on Planning Application 4555/16

Hi Rebecca,

We sent our consultation response to planning admin – maybe it wasn't forwarded on? However, you are correct, £50 indexed for residential, £0 for all other uses.

Kind regards,

Angharad Firth

Infrastructure Support Officer
Infrastructure Team

Babergh and Mid Suffolk District Council – Working Together

Mob: 07710854584
Tel: 01449 724978

Personal Office Hours: Mon-Thurs 9:00 – 17:00 Fri 9:00 – 16:30

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

Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given within this email.



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0300 123 4000

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 29 November 2016 13:48

To: Planning Admin; Infrastructure Team (Babergh Mid Suffolk)
Subject: RE: Consultation on Planning Application 4555/16

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 B1 Development, if granted, will attract a CIL Liability of £0sqm. Please could you ensure that the CIL Additional Information Form 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](#) ******



SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raynegate Street, Bury St Edmunds
Suffolk

Tel: 01284 774141
www.suffolk.police.uk

Planning Application (4555/16)

SITE: 143 Dwellings and 15 Class B1 units at Phase 3a and Phase 3c, Gun Cotton Way, Cedars park, Stowmarket, IP14 5EP

Applicant: Lansbury Developments Ltd

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 143 residential properties and 15 Class B1 units at land on Gun Cotton Way, Cedars Park, Stowmarket. **On behalf of Suffolk Constabulary I have no objections to the proposals in their current form. However, I do have concerns as to how the perimeter from the North Western side at Tommo Industrial Estate down to the South Eastern side by Tesco's store will be secured? At present most of the site particularly along phase 3c backs onto arable land. While Phase 3a perimeter by Tommo Industrial site has poor quality chain link fencing. I also have concerns over the permeability of the site at Phase 3a, with too many access pathways between plots 34 and 35, 41 and 42, plot 45, 47 and 48, 49 and 50, 56 and 57 and at 76 and 77. Such a large amount of walk ways, are known to act as crime generators that allow offenders ample routes to and from the site. If such paths are deemed essential they should be gated with secure 1.8m high gates at the entrance of the footpath, or at the very least controlled through kissing gates.**

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 dis-order.

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.

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- 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 of Phase 3a.
- 1.3 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.
- 1.4 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 for Phase 3a, with too many access pathways, which will act as crime generators, between

plots 34 and 35, 41 and 42, plot 45, 47 and 48, 49 and 50, 56 and 57 and at 76 and 77. Such a large amount of walk ways will allow offenders ample routes in and out of the area. If such paths are deemed essential they should be gated with secure 1.8m high gates at the entrance of the footpath. Or at least, monitored with kissing gates in line with BS5709 standards.

- 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 for the rear of the two sites running North Westerly to South Easterly. I would ideally like to see 2 metre welded mesh fencing, especially for site 3a where it borders Tommo Industrial estate. If such measures are unfeasible then I would suggest at the very least 2 metre boarded wooden fencing.

- 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

4.0 Footpaths

- 4.1 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.

- 4.2 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).

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

5. Lighting

- 5.1 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.

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

6. Car Parking

- 6.1 The layout of the plans allows natural surveillance of the parking areas, which is commendable.
- 6.2 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.

7. Communal Areas/ Public Open Space

- 7.1 **Communal Areas/Public Open Space:** Para 6.29 entitled "Open Space Provision" at page 30 of the Design Access Statement cites 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 each area. Section 9, SBD 2016, provides further details around Communal areas in order to reduce the potential for ASB and Criminal Damage issues.
- 7.2 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.
- 7.3 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.
- 7.4 All litter bins should be of a fire retardant material.
- 7.5 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.

8. Further Recommendations in General

- 8.1 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.
- 8.2 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).
- 8.3 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.

9.0 Class B1 Business Units

9.1 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

9.2 **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.

9.3 **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

9.4 **External door-set apertures** It is important that the door-set aperture is protected. Due to the nature of some commercial building uses and locations there is an expectation that the security will be required to meet the following minimum standards when the building is unoccupied:

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

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 1st 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 **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

10. Conclusion

10.1 With regard to the commercial units designers should take care not to inadvertently create climbing aids and flat roofs. While there will be other staff entrance/exits, public/visitor entrances should be limited to one main area only. This allocated public entrance/exit area should also have electronic access control, supplemented by audio and/or visual equipment.

10.2 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development.

10.3 As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following

standards

[http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured by Design Homes 2016 V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf)

- 10.4** SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards. It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>
- 10.5** To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
- a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 Issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
 - b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (Internal specification).
 - c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, or STS204 issue 3:2012, or LPS1175 issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.
- 10.6** 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 which explains all the crime reduction elements of the scheme.

In conclusion, I have no objections to the plan in its current format, but as stated I do have concerns as to how the perimeter from the North Western side at Tommo Industrial Estate down to the South Eastern side by Tesco's store will be secured? At present most of the site particularly along phase 3c backs onto arable land. While Phase 3a by Tommo Industrial site has a perimeter of poor quality chain link fencing. I also have concerns over the permeability of the site at Phase 3a, with too many access pathways between the plots stated. Such a large amount of walk ways will act as crime generators and allow offenders ample routes to and from the site. If such paths are deemed essential they should be gated with secure 1.8m high gates at the entrance of the footpath. Or at least monitored with kissing gates in line with BS5709 standards.

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

16/01/2017

For the attention of: Rebecca Biggs

Ref: 4555/16; Phases 3A & 3C Cedars Park, land South of Gun Cotton Way, Stowmarket

Thank you for consulting us on the proposals for a residential development of the erection of 143 dwellings and 15 Class B1 units on 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 sites which link the existing developed Cedars Park development with the commercial/industrial hinterland of northern Stowmarket and as such, the proposals will have an insignificant impact (on the landscape) due to the site forming part of a wider allocated strategic development area.

It is important that the proposals deliver a comprehensive landscape scheme for the site to both create a suitable and high quality development environment while mitigating the impact development will have on the adjacent residential areas to the north and limiting views to the industrial areas to the south. The following points highlight our key recommendations for the submitted proposals:

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 143 dwellings over two sites (site 3a 80 dwellings and site 3c 63 dwellings) 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 landscape proposals for each of the two development sites. 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 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.

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.

Consultee Comments for application 4555/16

Application Summary

Application Number: 4555/16

Address: Phases 3A & 3C Cedars Park, land South of Gun Cotton Way, Stowmarket IP14 5EF

Proposal: Erection of 143 dwellings and 15 Class B1 units.

Case Officer: Rebecca Biggs

Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

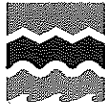
Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds IP30 9ET

Email: bob@gardeners8.plus.com

On Behalf Of: Ramblers Association - Bob Boardman

Comments

I have viewed these plans and I do not have any comments or observations to make.



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: P00540072

05 December 2016

Dear Ms Biggs

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

**PHASES 3A & 3C CEDARS PARK, LAND SOUTH OF GUN COTTON WAY,
STOWMARKET, IP14 5EP
Application No 4555/16**

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

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Rebecca Biggs

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

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: 15 December 2016 15:31
To: Planning Admin; BMSDC Planning Area Team Yellow
Subject: Planning applications

Please see below for comments regarding recent planning applications:

4504/16

No objection be raised to the grant of planning consent.

4555/16

The Town Council opposes the planning application on the following grounds:

- i) That the application site had been designated for commercial use and any change to the designated use would be contrary to planning policy **COR11**;
- ii) That if the site were to be developed for housing, contrary to the original designation, there would be a loss of much needed employment opportunities for the town; and
- iii) That, contrary to planning policies **ENV05**, **H17** and **PPS23**, the site is wholly unsuitable for housing due to its close proximity to the Anglian Water Sewerage Works.

4826/16

No objection be raised to the grant of planning consent.

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 | www.stowmarket.org



@stowmarketTC



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



Consultation Response Pro forma

| | | | | | | | | |
|----------------------------|---|---|-------|----------------|------------|------------------|----------------------------|----------|
| 1 | Application Number | 4555/16 Phase 3A and 3C Cedars Park, Land South of Gun Cotton Way, Stowmarket | | | | | | |
| 2 | Date of Response | 16/02/2017 | | | | | | |
| 3 | Responding Officer | <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 | | | | | | | |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • 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. | | | | | | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <p>This application seeks full planning permission for the erection of 143 no. dwellings, and erection of 15 no. Class B1 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 to the east of Stowmarket, on two areas of land separated by an open field.</p> <p>This proposal has the potential to affect the setting of the Stowmarket Conservation Area to the west and south of the application sites which contains a number of listed buildings. The application sites are separated from the Conservation Area and listed buildings by distances of at least 200m, and are intercepted from the application site by the railway line and existing industrial units.</p> <p>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, obscured by existing industrial development, and will not harm the setting of the Conservation Area or listed buildings within it.</p> <p>No objection.</p> | | | | | | |

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

| | | |
|---|--|--|
| | | |
| 6 | <p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | NB: Planning Statement available on Idox appears to relate to phase 3D – ref 4556/16, rather than this scheme. |
| 7 | Recommended conditions | |

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

From: Nathan Pittam
Sent: 22 December 2016 10:46
To: Planning Admin
Subject: 4555/16/FUL. EH - Land Contamination.

M3 : 187283
4555/16/FUL. EH - Land Contamination.
Land south of, Gun Cotton Way, STOWMARKET, Suffolk.
Phases 3A & 3C Cedars Park. Erection of 143 dwellings and 15 Class B1 units.

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
w: www.babergh.gov.uk www.midsuffolk.gov.uk

From: RM PROW Planning
Sent: 16 December 2016 12:32
To: Planning Admin
Cc: Kevin Verlander; Martin Egan; p.mcintosh@melvilledunbarassociates.com
Subject: RE: Consultation on Planning Application 4555/16

Our Ref: W497/015/ROW856/16

For The Attention of: Rebecca Biggs

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This response deals only with the onsite protection of affected PROW, and does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, SCC may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

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.

Phase 3A

Public Footpath 15 is not shown on the plans so it is not clear how the proposed acoustic fencing will affect the alignment of the route.

Blackthorn hedging alongside a PROW is not desirable and having it coppiced will cause a thicket. We require a maintenance plan for the hedging to ensure there is no encroachment on to the FP.

There should be pedestrian access links from the development onto the public footpath for the residents of the new development to access the network. We recommend links from the cul-de-sacs through to FP15 and as part of the development, that a footbridge/culvert is placed at each link to be able to cross the ditch.

Phase 3C

Public Footpaths 39 and 40 recorded alongside the site.

Informative Notes:

Please note that the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way.

Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. In order to avoid delays with the application this should be considered at an early opportunity.

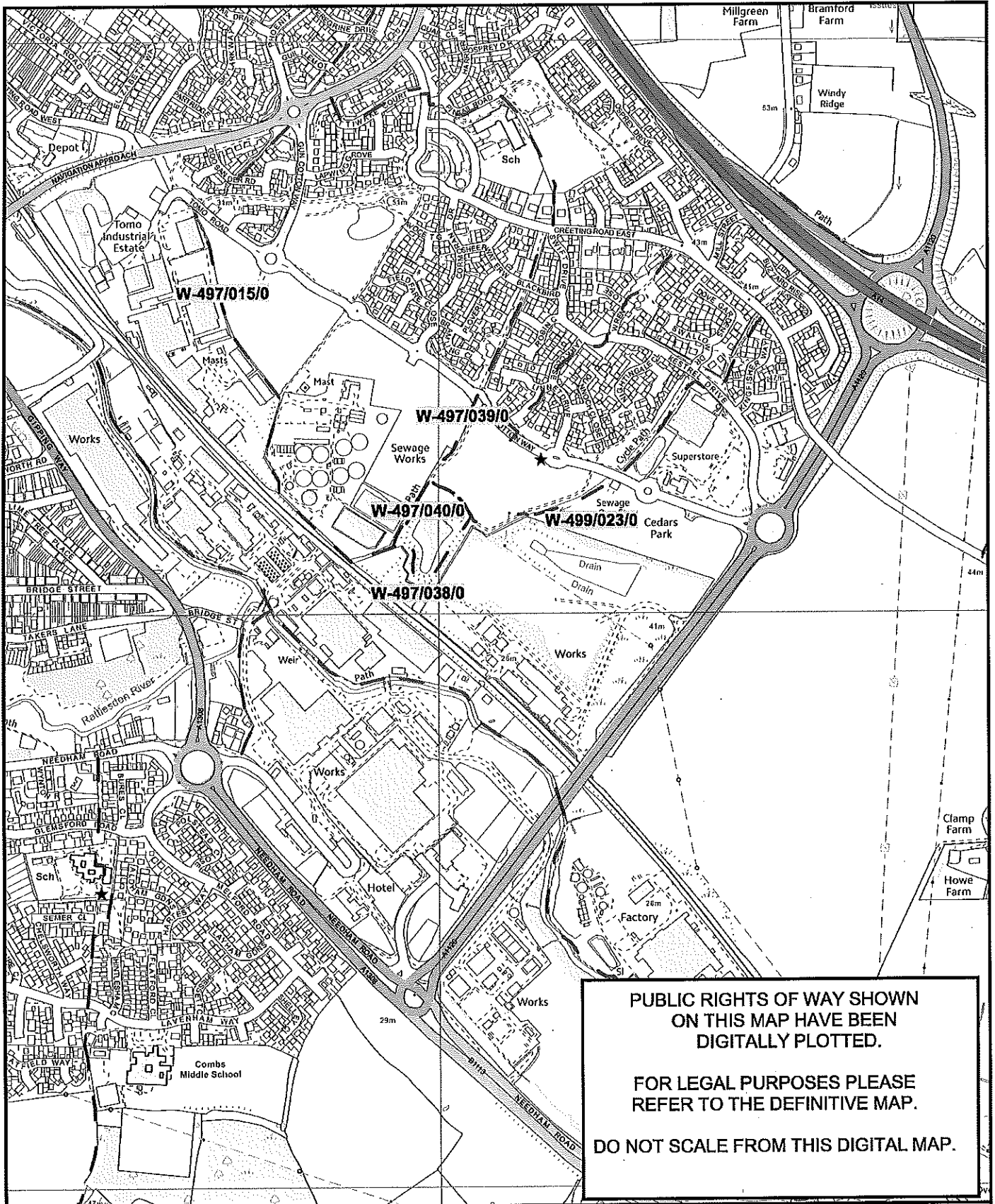
The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team.

Nothing in this decision notice shall be taken as granting consent for alterations to Public Rights of Way without the due legal process being followed. Details of the process can be obtained from the Rights of Way & Access Team.

"Public Rights of Way Planning Application Response - Applicant Responsibility" and a digital plot showing the definitive alignment of the route as near as can be ascertained; which is for information only and is not to be scaled from, is attached for the applicant.

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



**PUBLIC RIGHTS OF WAY SHOWN
ON THIS MAP HAVE BEEN
DIGITALLY PLOTTED.**

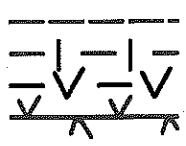
**FOR LEGAL PURPOSES PLEASE
REFER TO THE DEFINITIVE MAP.**

DO NOT SCALE FROM THIS DIGITAL MAP.

**4555/16 Phases 3A & 3C Cedars Park, land south of Gun Cotton Way, Stowmarket
Public Footpaths 15, 39 and 40**



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



Ordnance Survey MasterMap

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

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Scale 1:7500



Date: 16/12/2016



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00018973
Local Planning Authority: Mid Suffolk District
Site: Phases 3A & 3C Cedars Park, land South of
Gun Cotton Way, Stowmarket
Proposal: Creation of 143 x C3 Dwellings and 1500 SQM
of B1 Business
Planning Application: 4555/16

Prepared by: Sandra Olim

Date: 03 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

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 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included
-

within your Notice should permission be granted.

"An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.

Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.

Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Rebecca Biggs – Development Management Officer

From: Julie Abbey-Taylor, Professional Lead – Housing Enabling

Date: 6/07/2017 – Revised response

SUBJECT: - **Application Reference: M/4555/16/FUL**

Proposal: Application for Planning permission for erection of 143 dwellings and 15 Class B1 units on phases 3A & 3C Cedars Park, land south of Gun Cotton Way, Stowmarket

Key Points

1. Background Information

A development proposal for one hundred and forty three (143) residential dwellings split across two parcels of land – 3A (80 units), and 3C (63 units). My comments only relate to the housing dwellings not the employment units proposed.

This is an open market development and offers 2 affordable housing units on 3C which = 2.5% and 26 affordable housing units on 3A = 41.2 %, giving an overall affordable housing provision of 19.5% across the two parcels.

There are 80 dwellings proposed for parcel 3C, 63 dwellings for parcel 3A. Each parcel should provide against the affordable housing policy but the two sites have been submitted for consideration by the same applicant together. In addition, the same applicant has submitted phase 3D which has 48 dwellings overall with a provision of 16 affordable homes on that site (33% affordable housing).

2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing. A new SHMA is currently being written but outcomes are not available at the time of this consultation.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2

| Estimated proportionate demand for affordable new housing stock by bedroom number | |
|---|---------------------------------|
| Bed Nos | % of total new affordable stock |
| 1 | 46% |
| 2 | 36% |
| 3 | 16% |
| 4+ | 2% |

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

| Ref3 Estimated proportionate demand for all tenure new housing stock by bedroom number | |
|--|----------------------|
| Bed Nos | % of total new stock |
| 1 | 18% |
| 2 | 29% |
| 3 | 46% |
| 4+ | 6% |

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa.890 applicants registered for affordable housing in Mid Suffolk at May 2017.

2.7 The Council's Choice Based Lettings system currently has 358 applicants registered for affordable housing, who are seeking accommodation in Stowmarket as at March 2017. This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **890** applicants registered is the important number.

3. Preferred Mix for Open Market homes. The open market mix shows that there are: -

- 2 x 2 bed bungalows
- 1 x 3 bed bungalow
- 2 x 2 bed houses
- 19 x 3 bed houses
- 18 x 4 bed houses

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

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

4. Preferred mix for Affordable Housing

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 358 applicants registered who have a connection to Stowmarket.

4.2 28 of the proposed dwellings on the 2 development parcels will be for affordable housing. These have been offered the form of: -

Affordable Housing – 3C

2 x 2 bed 4-person Bungalow - Part M4(3) (Plots 10-11) @76sqm for Afford. Rent

Affordable Housing – 3A

9 x 1 bed 2-person Apartment (plots 1 -12) @ 51 – 55 sqm (Plots 1-12) Shared O'ship

3 x 2 bed 4-person Apartment (Plots 1-12) @ 70 sqm Shared O'ship

6 x 2 bed 4-person Apartment (Plots 60-65) @ 71sqm Afford. Rent

6 x 2 bed 4-person Apartment (Plots 68-73) @ 71 sqm Afford. Rent

2 x 2 bed 4-person Houses (Plots 29-30) @ 90sqm for Discounted Market Sale

Total 26

Tenure 3A/3C

Affordable Rent: 14

Shared Ownership: 12

Discounted Market Sale: 2

Total: 28

As discussed with the applicant's consultants Melvin Dunbar Associates I am not in agreement with the tenure proposal for some of these units as there is a risk that they will not be purchased by an RP. This particularly relates to some of the flats offered as shared ownership. Therefore I propose the required alterations to the proposed mix to be as follows: -

9 x 1 bed 2-person apartments to be available for affordable rent, **not** shared ownership.
6 x 2 bed 4 person apartments on parcel 3A to be available for shared ownership – RP to choose which plots for rent or shared ownership between plots 68 – 73 and 60 – 65.

The mix being offered is not what we originally sought but is the result of formal viability negotiations between the applicant and the Council.

The above mix is requested and to be included in the S106 agreement if the application is approved.

5. Other requirements for affordable homes:

- Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units on initial lets and 75% thereafter.
- Adequate parking provision is made for the affordable housing units

Julie Abbey-Taylor, Professional Lead – Housing Enabling

Your Ref: MS/4555/16
Our Ref: 570\CON\2556\17
Date: 21st July 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

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/4555/16

PROPOSAL: Erection of 143 dwellings and 15 Class B1 units
LOCATION: Phases 3A & 3C 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:

Drawing Number 1467-3A-P001/A and 1467-3C-P001/A.

COMMENTS:

For Site 3A, as previously advised, the Gun Cotton Way and Tomo Road site frontages should have a 2m wide footway provided against the road edge. There is no need to incorporate an additional verge. The levels on the Tomo Road frontage are such that without significant on site earth works and retaining walls it would not be possible to provide the footway and verge as shown on Drawing Number 1467-3A-P001/A. The required frontage details are laid out on the Richard Jackson Drawings contained within the Transport Assessment. The LPA will need to decide if such discrepancies between the various submitted drawings are an issue. The applicant should note that the existing highway boundary along this road frontage varies from between 5.6m and 4.5m width. In addition, the Richard Jackson Drawings indicate the required off site footway improvement works to allow the new footways (and therefore residents) to connect with the existing on the opposite side of each road.

Apart from shared surface road service strips, which are too narrow at 0.5m, the other outstanding areas of concern relate to car parking. In terms of visitor car parking the philosophy is to provide spaces where demand is likely. The design submitted suggests that sufficient overall numbers of visitor spaces are provided. Unfortunately, many spaces are positioned where demand is least required, especially for Area 3C. The result will be on-street car parking. I highlight areas of Plots 13-18, 23-30, 35-39, 54-55, 59-63 where there is no provision but demand will exist.

On Area 3A I maintain concerns about parking allocations. Apartments 1-12, 9 x 1 beds, 3 x 2 beds, should have 17 spaces whereas 15 are provided. Plots 14-19, all 2 bed should have 11 spaces, only 8 provided (the full 11 spaces are available for the other Type M units, Plots 60-65 and 68-73). Plots 25 and 26, 2 beds, only appear to have 1 parking space. Other parts of the site, predominantly 2 bed Type L

units, rely on parking spaces which are distant/not well related to the units. There will be resultant car parking issues within Area 3A.

In terms of landscaping the verges on Area 3A it should be noted that trees will not be permitted within the highway verges. A spacing of at least 5 metres is required between any proposed tree and the edge of roads and footways. Any landscaping scheme will need to consider these requirements.

If the LPA is minded to approve this application, then the following highway conditions will be appropriate:

1 AL 3

Condition: The new vehicular accesses shall be laid out and completed in all respects in accordance with Drawing Numbers 1467-3A-P001/A and 1467-3C-P001/A as submitted and made available for use prior to any dwelling or commercial unit 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.

2

Condition: Before any dwelling or commercial unit is first occupied the developer shall construct a 2 metre wide footway along the Gun Cotton Way and Tomo Road site frontages in accordance with Drawing Numbers 45391-C-005 Revision A and 45391-C-006 Revision A as submitted and in accordance with construction details which shall first have been submitted to and approved by the Local Planning Authority.

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

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 area(s) within the site shown on Drawing Numbers 1467-3A-P001/A and 1467-3C-P001/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 V 1

Condition: Before the accesses are first used visibility splays shall be provided as shown on Drawing Numbers 1467-3A-P001/A and 1467-3C-P001/A as submitted and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action.

7

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.

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

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)

8

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.

9 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.

10 NOTE 05

Public Utility apparatus may be affected by this proposal. The appropriate utility service should be contacted to reach agreement on any necessary alterations which have to be carried out at the expense of the developer. Those that appear to be affected are all utilities

11 NOTE 07

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

12 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.

13 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

(i) Travel Plan

Please refer to the comments from Chris Ward, Travel Plan Officer, which were previously provided and 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:

(ii) Public Transport

There is a desire to upgrade the existing bus stops within the Gun Cotton Way and Tomo Road site frontages for the benefit of potential employees, residents and visitors to site 3A and 3C. 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.

(iii) 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 = 2145m² @ £25/m² = £53,625.00
- Resurfacing of Stowmarket FP12: 1135m length x min 1.5m width = 1703m² @ £25/m² = £42,562.50
- Resurfacing of Stowmarket FP57: 520m length x min 1.5m width = 780m² @ £25/m² = £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

Your ref: 4555/16
 Our ref: 00045623
 Date: 22 December 2016
 Enquiries to: Peter Freer
 Tel: 01473 264801
 Email: 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, Phases 3A & 3C Cedars Park, land South of Gun Cotton Way
 - Erection of 143 dwellings and 15 Class B1 units.**

| Proposed number of dwellings from development: | 1 Bedroom apartments | 2 Bedroom apartments | 2 bedroom + Houses | Total |
|--|----------------------|----------------------|--------------------|-------|
| | 9 | 30 | 104 | 143 |
| Approximate persons generated from proposal | 11 | 69 | 239 | 319 |

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 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

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

www.suffolk.gov.uk

most properties.'

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 36 | 36 | 4,348 |
| High school age range, 11-16: | 26 | 26 | 18,355 |
| Sixth school age range, 16+: | 6 | 6 | 19,907 |

| | |
|---------------------------------------|--------------------|
| Total education contributions: | £753,200.00 |
|---------------------------------------|--------------------|

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 phases 3A and 3C, SCC can assume 6 pupils will arise in both reception and in year 1, and 5 pupils will arise in each of the year groups 2 – 5, and 4 in year 6 which would mean that over 7 years a total cost of £114,000 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: | 14 | 14 | 6,091 |

| | |
|---|-------------------|
| Required pre-school contributions: | £85,274.00 |
|---|-------------------|

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:
- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. 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.
 - c. 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: |
|-------------------------|

| |
|-------------------|
| £30,888.00 |
|-------------------|

- 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

| Service Requirement | Contribution per dwelling | Capital Contribution |
|----------------------------|----------------------------------|-----------------------------|
| Education - Primary | £1,094.60 | £156,528.00 |
| Education – Secondary | £3,337.27 | £477,230.00 |
| Education – Sixth Form | £835.26 | £119,442.00 |
| Pre-School | £596.32 | £85,274.00 |
| Transport | | |
| Libraries | £216.00 | £30,888.00 |
| Waste | £0.00 | £0.00 |
| Total | £6,079.45 | £869,362.00 |

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.

| Service Requirement | Contribution per dwelling | Capital Contribution |
|--|----------------------------------|-----------------------------|
| Education travel contributions/safer route to school | £797.20 | £114,000.00 |
| Total | £797.20 | £114,000.00 |

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,

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

cc Neil McManus, SCC

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: 4555/16
Our Ref: FS/F221362
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 12/12/2016

Dear Sirs

Land south of Gun Cotton Way, Stowmarket IP14 5EP
Planning Application No: 4555/16

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Continued/

OFFICIAL

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

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

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

Yours faithfully

Mrs A Kempen
Water Officer

Enc: PDL1

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

Planningcontributions.admin@suffolk.gov.uk

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:
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

Planning Ref: 4555/16

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land south of Gun Cotton Way, Stowmarket IP14 5EP
DESCRIPTION: 143 Dwellings and 15 Offices
NO: HYDRANTS POSSIBLY REQUIRED: Required

Date: 12 December 2016

Planning Control

Received

15 DEC 2016

Acknowledged

IP14 5EP

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

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

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen
Water Officer

OFFICIAL



Consultation Response Pro forma

| | | | |
|----------|---|---|------------------------------|
| 1 | Application Number | 4555/16 OPP for Sites 3A and 3C Gun Cotton Way Site 3A : 80 dwellings + 15 B1 units Site 3C : 63 dwellings | |
| 2 | Date of Response | January 2017 | |
| 3 | Responding Officer | Name: | Delia Cook |
| | | Job Title: | Economic Development Officer |
| | | Responding on behalf of... | Economic Development Team |
| 4 | Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | <p>The Economic Development Team were included in pre application discussions on this site and, although final proposals represent a considerable reduction to the original employment land allocation, the Team wish to support this application subject to the following recommendations:</p> <p>Receipt of satisfactory site viability in respect of proposed B1 buildings and affordable housing provision</p> <p>Review of the proposed Class B1 use for small business units to ensure viability. Possible broadening of Use Class to allow C1, C2, D1 and A1 use classes. Ensure that appropriate market research is undertaken by developer to identify demand.</p> <p>Condition to ensure that the small business units are developed at same time as residential development</p> <p>Safeguarding of B class uses on other employment land allocation at Mill Lane as 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> | |
| 5 | Discussion Please outline the reasons/rationale behind | The Core Strategy Focused Review acknowledged constraints of delivering employment land on Cedars Park in accordance with Mid Suffolk Local Plan 1998 (Mid | |

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>how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.</p> | <p>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>There is a Policy requirement for a buffer zone from the sewage treatment works that impacts upon Site 3A. This is accommodated within current application by inclusion of 15 no small business units to the eastern boundary of this parcel of land.</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 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>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | <p>Please see above.</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.

| | | |
|---|-------------------------------|--|
| 7 | Recommended conditions | 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.

Subject:FW: 2017-06-19 JS Reply 4555/16 Phases 3A & 3C Cedars Park Land South Of Gun Cotton Way Stowmarket IP14 5EP

From: Jason Skilton
Sent: 19 June 2017 11:52
To: X Delete Aug 17 - Planning Emails <planningcontrol@baberghmidsuffolk.gov.uk>
Cc: Rebecca Biggs <Rebecca.Biggs@baberghmidsuffolk.gov.uk>
Subject: 2017-06-19 JS Reply 4555/16 Phases 3A & 3C Cedars Park Land South Of Gun Cotton Way Stowmarket IP14 5EP

Dear Rebecca Biggs,

Subject: 4555/16 Phases 3A & 3C Cedars Park Land South Of Gun Cotton Way Stowmarket IP14 5EP

Suffolk County Council, Flood and Water Management have reviewed application ref 4555/16

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

1. Site layout plan dwg 1467-3A-P001
2. Site layout plan dwg 1467-3C-P001
3. Flood Risk Assessment Site 3A, 3B, & 3D Cedars Park, Stowmarket & appendixes ref 45391 No 2016
4. Site 3C Drainage Strategy 45391/3C/100
5. Site 3A Drainage Strategy 45391/3A/1001
6. Pre Planning Assessments AWS Dated 18 & 19 Oct 2016
7. Maintenance Schedule Ref 45391 Cedars Park Sited 3A,3B & 3D
8. Typical Preliminary Construction Details dwg 45391-C-015

We propose the following condition in relation to surface water drainage for this 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 72th dwelling and 7th class B1 unit 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.

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 is 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: 30/06/2017

YOUR REF: 4555/16/FUL

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

Thank you for consulting me on the above application for the erection of 143 dwellings and 15 Class B1 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 on Gun Cotton Way and current commercial operations along the southern boundary together with proposed B1 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 4 (including ventilation) and an acoustic barrier is constructed as indicated in Figure 2 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, Climax 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 in this regard. 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 sites (3A and 3C) are 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 sites have been quantified by dispersion modelling.

For site 3C 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 98th percentile (2% of the time spread throughout a year) is acceptable and unlikely to cause complaint. The dispersion modelling indicates odour concentrations at the nearest residential premises are at 3 ou and below this for the majority of the site. I do not, therefore, have any adverse comments in respect of odour issues for site 3C.

For site 3A the results of modelling indicate that the impact on the nearest residential premises will be between 7 and 10 odour units (expressed as a 98th percentile). It is widely accepted that odour concentrations between 5 and 10 odours units may generate complaints and may give rise to nuisance. In these cases I would not ordinarily support approval of this development. The report, however, points out that there are existing dwellings on the opposite side of Gun Cotton Way in the same circumstance with odour concentrations predicted to be at 10 odour units. The report relies on this to conclude that the potential for adverse odour impact is considered to be low.

Although I have concerns about the introduction of more odour sensitive premises near to Stowmarket STW, in the absence of any experience that odour is currently causing adverse impact or nuisance, I am minded not to recommend refusal.

If you should 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 MCIEH
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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 4555/16

Referring to the planning application referenced above, dated 30 November 2016, application for the erection of 143 dwellings and 15 Class B1 units, Phases 3A & 3C Cedars Pak, 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.¹

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

Signature:

Date: 19 December 2016

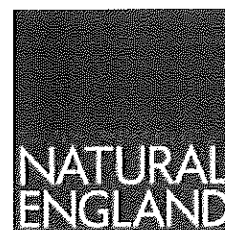
Name: David Abbott

Position: Asset Manager

Highways England:
Woodlands, Manton Lane
Bedford MK41 7LW

david.abbott@highwaysengland.co.uk

Date: 13 December 2016
Our ref: 202793
Your ref: 4555/16



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

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

BY EMAIL ONLY

T 0300 060 3900

Dear Sir / Madam

Planning consultation: Erection of 143 dwellings and 15 Class B1 units.
Location: Phases 3A & 3C Cedars Park, land South of Gun Cotton Way, Stowmarket IP14 5EP

Thank you for your consultation on the above dated 29 November 2016 which was received by Natural England on the same way.

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

The Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2010 (as amended)

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

Statutory nature conservation sites – no objection

Natural England has assessed this application using the Impact Risk Zones data (IRZs) and is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which Combs Wood SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(1) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.

Protected species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect

the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

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

Local sites

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

Biodiversity enhancements

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

Landscape enhancements

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015, which came into force on 15 April 2015, has removed the requirement to consult Natural England on notified consultation zones within 2 km of a Site of Special Scientific Interest (Schedule 5, v (ii) of the 2010 DMPO). The requirement to consult Natural England on *"Development in or likely to affect a Site of Special Scientific Interest"* remains in place (Schedule 4, w). Natural England's **SSSI Impact Risk Zones** are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments *likely to affect a SSSI*. The dataset and user guidance can be accessed from the gov.uk website.

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

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

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Dan Morris
Consultations Team



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

cc Melville Dunbar Associates



Environment
Agency

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

Our ref: AE/2016/121118/01-L01
Your ref: 4555/16
Date: 19 December 2016

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**

Thank you for your consultation received on 29 November 2016. We have inspected the application, as submitted, and are raising a holding objection on foul drainage grounds.

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.

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 250m 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 400m 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 advice is useful.

Yours sincerely

Miss Eleanor Stewart
Sustainable Places - Planning Advisor

Direct dial 020 8474 8097

Email planning.ipswich@environment-agency.gov.uk

cc Melville Dunbar Associates



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: 4555/16

Location: Phases 3A & 3C Cedars Park, land South of Gun Cotton Way, Stowmarket IP14 5EP

Proposal: Erection of 143 dwellings and 15 Class B1 units

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 Phases 3A & 3C (as well as the adjacent Phase 3D application) as a condition of any consent.

Recommendations

The mitigation measures identified in the Ecological management plan (Applied Ecology, Feb 2015) and Ecology report update (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 APPRASAL RECOMMENDATIONS

"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological management plan (Applied Ecology, Feb 2015) and Ecology



report update (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 SLAB LEVEL: BIODIVERSITY ENHANCEMENTS

“A biodiversity enhancements strategy details measures and/or works to be included within the design shall be submitted carried out in accordance with the details contained in the Ecological management plan (Applied Ecology, Feb 2015), Ecology update report (Applied Ecology April 2017) and Reptile Mitigation Strategy (to be prepared), shall be submitted and approved in principle with the local planning authority prior to determination”.

IV. 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

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.