



**STOWUPLAND PARISH COUNCIL**  
**2 Broomspath Road, Stowupland, Suffolk, IP14 4DB**  
**Clerk: Claire Pizzey**  
**☎ 01449 677005 (10am-noon Tuesdays-Thursdays)**  
**✉ [clairepizzey@outlook.com](mailto:clairepizzey@outlook.com)**

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

10 February 2017

Dear Mr Platt

**Application Number 5024/16: Outline planning application with all matters reserved for the erection of up to 85 dwellings with associated parking, landscaping, open space and surface water attenuation**

Stowupland Parish Council **OBJECTS** to the above planning application. The Parish Council are not opposed to housing development of a suitable size in a suitable location. The council ask that you bear in mind the planning permission granted in 2016 for 175 dwellings.

Please see the comments below from the Parish Council relating to their objection.

- The Parish Council feel that the proposed development is too large for the village, it is in the wrong location and the proposed development is unsustainable. This number of dwellings would add some 10% to the population of the village. This would simply be too much growth and would overwhelm the village. It is clear that the applicant's intention by submitting this application for development adjacent to that proposed within application no. 0195/16 is to gain permission for some 143 dwellings which would cause even greater harm than the original application on its own. When this number of dwellings is added to those permitted on the Gladman site, the total increase would be over 33%.

It would result in development in the important gap between Stowupland and Stowmarket. In talking about the three dimensions of sustainable development the NPPF says in paragraph 10:

"Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas."

This is the context for applying the presumption in favour of sustainable development (set out in paragraph 14). From Suffolk County Council responses to other applications in Stowupland and from local knowledge we are very aware of the extent of the problem from the schools' point of view. With the move from three tiers to two the village has experienced additional traffic movements at both schools. If this development is allowed the result at peak time will be people from the new development driving their children to any primary school with spare capacity and to Stowmarket High School at the same time as pupils walking, or cycling are being driven to the two village schools.

Stowupland is a well-balanced community – it is a real rural village with a good mix of people, many who have lived here all, or most of their lives. This amount of development will have a big and detrimental impact on the social infrastructure of the village. We are not a dormitory village, the sports and social facilities are well supported, and whilst we welcome new residents the proposed quantity of new residents would put a strain on some of these facilities, particularly football.

There is some employment in and around the village, but the reality is that most will commute outside the village and the area to work and most of these trips will be by car, many via the already congested A1120/B1115 junction.

This proposed development will be in addition to the planned growth set out in the SAAP, and therefore the additional population will place an unsustainable demand on health care provision and other services and facilities (including leisure) in the Stowmarket area. If this development goes ahead it will set a precedent for similar unplanned development in other parishes increasing the stress on services and facilities. There is already a strain on the existing GP practices in Stowmarket (as evidenced by the letter from NHS England), and on school places at both schools in the village. The cumulative impact of unplanned housing development on this scale will add a considerable burden on already over-stretched public services.

- Traffic from this development will have a detrimental impact on the whole village.

85 dwellings will result in over 200 extra vehicle trips per day, plus delivery vehicles, refuse lorries etc. The A1120, the main coast road, is a designated tourist route. There are peaks on weekdays, fine weekends, particularly Sundays (when pelotons of cyclists are a regular feature throughout the year), and the road is also well used by lorries and farm traffic, and is the main route for emergency vehicles.

At peak times the junction with the B1115 by the garage is congested and sometimes dangerous with some vehicle drivers trying to by-pass the traffic waiting to turn right onto the B1115 by mounting the verge. This junction is very close to the garage used by residents to buy newspapers and other items, and by students from Stowupland High School. There has already been one fatality here, and the inevitable amount of traffic movements from the proposed site would be detrimental to road safety from the point of view of all road users and residents in the village. The suggestion from SCC Highways that a payment of £20,000 would overcome these difficulties is clearly absurd. The Inspector at the Gladman Inquiry saw, on his visit to inspect the A1120/B1115 junction that SCC had underestimated the level of congestion.

The application shows the one access to the proposed site crossing the pedestrian/cycle route which is especially busy at school start and finish times; it is also heavily used by dog walkers from Cedars Park to gain access to Stowupland Green and by Stowupland residents walking to Stowmarket station and town centre. This length of the route was constructed as part of the safer route to school from Cedars Park and any vehicular access across it is a potential danger to pedestrians and cyclists, many of whom are of school age.

- A development of such a large area will result in loss of residential amenity for those living close to it; and a loss of visual amenity to all residents of the village, particularly walkers, riders, runners, and all who use the footpaths near the site.

It is typical High Suffolk countryside as evidenced by the Landscape and Visual Appraisal submitted with the application. However, this report fails to place the proposed development in a wider context. The photographs submitted give a hint of this, but a site visit and walk around the network of rights of way reveal wide views from, through, and into the site from beyond the boundaries. It should be noted that the photographs are taken with the trees and hedgerows in full leaf. On a clear day the value of this site to the wider countryside, the area around the village that is an essential part of its character, is very evident. The fact that the High Suffolk landscape in this area does not have a national or local designation does not mean that it is not of value to the immediate and wider area.

The Landscape Appraisal carried out by Allison Farmer Associates in December 2016 speaks of the far reaching views across the Gipping Valley. These would be lost if this development were permitted and views from the

opposite side of the valley would be harmed by the imposition of this development. Extracts from the Alison Farmer Landscape Appraisal report are appended. The full document will be made available upon request.

The development will change the character of the area. The inevitable urbanisation, including roads, and street lighting, will join Stowupland to Stowmarket. The village would lose its identity. The gap between Stowupland and Stowmarket is important. A significant undeveloped band which might include community woodland is essential to avoid coalescence of the two very different and separate communities. A pond, a few trees and lengths of acoustic barrier are not acceptable. The Ashes Farm development brief identifies land forming part of this application as important in landscape terms.

Currently there is a clear sense of where the village is and where the countryside starts. SAAP Map 6.1 Visually Important Open Spaces illustrates this very well. A housing estate, no matter how well designed, will look (and feel) totally out of place in this location.

Paragraphs 6.51 to 6.55 of the SAAP describe the context of the villages surrounding Stowmarket. Paragraph 6.51 states:

*".....These villages are an essential part of our rural way of life and their unique character and local distinctiveness needs to be maintained and protected. This is especially the case for the villages surrounding Stowmarket where the future growth of the town may require the use of land."*

Paragraph 6.38 affirms the aim to ensure that the village does not coalesce with Stowmarket:

*"....The Council will require an acceptable level of separation from the surrounding villages, whose character and appearance should be safeguarded through the application of good design and landscape design principles. The Council notes that the village appraisals for both Stowupland and Onehouse recognise the important contribution made to the character of their villages by the open farmland between them and the existing edges of Stowmarket."*

If this application is permitted the level of separation which this paragraph seeks to achieve will be totally lost forever.

Also paragraph 6.42 repeats:

*"....The importance of maintaining the separate identity of Stowupland and Stowmarket."*

SAAP Policy 4.2 Providing a Landscape Setting for Stowmarket states:

*"..... 5) The council will resist development that would have a harmful effect on the value of a Visually important Open Space and will require developments that may have a detrimental effect on the quality of a Visually Important Open Space to be sensitively designed to minimise these effects."*

The wider landscape character includes listed buildings and cottages that are typical of this 'big sky' Suffolk landscape. This is described in paragraph 9.9 of the SAAP, and Policy 9.5 Historic Environment, particularly paragraph (iii).

The views of across the valley stretching out to Old Newton, Haughley and Onehouse, and the groups of trees, hedgerows, and the remnants of ancient woodland will all be irrevocably damaged by this development.

Once developed the character and appearance of the rights of way that run alongside the site will be lost forever. This change will inevitably lead to the loss of natural habitats in the ditches, trees and hedgerows. The loss of habitat for protected species such as the hare are really only the tip of the pyramid. Country dwellers don't think to report these things – it is part of living in the countryside.

This is an outline application with all layouts and sketches clearly marked as indicative. Once outline permission is granted and the land sold a house-builder can interpret "good design" in a number of ways, and the resulting

layout and design of houses may look nothing like the sketches. This amount of new development is out of scale and character with the village, and will have a detrimental impact on the rural character and setting of the village. New dwellings are not going to be of the same proportions as the low density housing along Thorney Green Road, and will look out of place on the entry to a rural village.

- The proposal is in the countryside outside the settlement boundary for Stowupland and it is contrary to extant policies from the 1998 Local Plan, Mid Suffolk's Core Strategy, the Core Strategy Focussed Review (CSFR), the Stowmarket Area Action Plan (SAAP), and does not comply with any of the exception criteria for development in the countryside set out in paragraph 55 of the NPPF.

The proposal is contrary to: Policy CS2 Development in the countryside and Countryside Villages; CS5 Mid Suffolk's Environment (particularly Landscape and Historic Environment); FC2 Provision and Distribution of Housing (85 dwellings on greenfield land is around 30% of the total planned in the first five year period for all Key Service Centre villages in the district, and a significant proportion of the greenfield site provision in all KSC villages for a ten year period).

The SAAP allocates land for growth in and around Stowmarket, Mid Suffolk's largest and most sustainable settlement. Stowupland is one of two Key Service Centres in the SAAP, and the document explicitly states, at paragraph 6.14: *"The Core Strategy includes provision for housing allocations in key service centres and primary villages. The Stowmarket Area Action Plan does not propose any allocations in its villages, because they are close to Stowmarket, which is the most sustainable location in relation to local employment and services."*

Paragraph 6.15 goes on: *"There will be scope for smaller scale housing development in some of the adjoining villages which have local services. These smaller scale development opportunities will be expected to share a fair proportion of the infrastructure delivery costs ....."*

The application site was not considered during the examination process, and the SAAP was not the subject of legal challenge following adoption.

The housing layout is urban in nature, totally unsympathetic to its rural location. Any development with a frontage on to Thorney Green Road should be single storey and set back from the road in similar form to the single storey development between the application site and Thorney Green. If any development is to be permitted it should be reduced in scale and have a village feel, with verges and green areas similar to other post-war development in Stowupland.

- The Parish Council have made significant progress with the work required to produce a Neighbourhood Plan. Results of a village wide questionnaire are already available and show clearly that residents do not support developments of the size being proposed. The Landscape Appraisal carried out by Alison Farmer Associates concludes that the application site should remain as open farmland. Approval of this development would deprive the community of deciding for itself how much growth is needed and where it should go. This type of proposal is the very antithesis of Localism. It will weaken the approved plans, the CSFR and the SAAP, as it will create a precedent that others will inevitably seek to follow.
- Much is made of the alleged lack of a five-year housing land supply in Mid Suffolk. In recent months appeals have been dismissed where Inspectors have acknowledged that the councils could not demonstrate a five-year housing land supply but that other planning issues significantly outweighed the benefits of these schemes. The Report of the Communities and Local Government Committee on the Operation of the National Planning Policy Framework published on 9 December 2014 brings this issue, and this type of application to the attention of the Minister, and the third change noted in the Summary says "Provisions in the NPPF relating to the viability of housing land are leading to inappropriate development: these loopholes must be closed." The CPRE published a report in September 2014, Targeting the Countryside which calls on the Government to (amongst other things) "Amend paragraph 49 of the NPPF so that there is not an automatic presumption in favour of granting planning permission where the local authority is unable to demonstrate a five year land supply." The research behind this report "Housing Supply Research: The impact of the NPPF's housing land supply requirements on housing supply and the countryside" (carried out by Parsons Brinckerhoff) includes many appeal case studies, and is available on the CPRE website.

**The presence or lack of a five-year land supply doesn't override the need to determine the application in accordance with the development plan. The proposed development is unsustainable and contrary to the NPPF, and contrary to policies in the 1998 Local Plan, the adopted Core Strategy and Focussed Review, and the Stowmarket Area Action Plan. There are sound planning reasons why the application should be refused, as the adverse impacts of this proposed development would significantly and demonstrably outweigh the benefits of providing a large number of dwellings in Mid Suffolk, contrary to the NPPF.**

In summary the strength of objections voiced by residents at a recent meeting arrange to display the most recent proposals for this and the adjacent site and discuss the two applications was enormous. The range of objections against this development include concerns about the impact this amount of development would have on the village, traffic safety, the loss of residential and visual amenity, coalescence with Stowmarket, the cumulative impact on infrastructure and services, the wellbeing of all residents, the effects on pedestrians, cyclists and views of the public footpath network and that it is contrary to local policies and against the wishes of the community.

The Parish Council feel strongly that developments within Stowupland need to be planned with the residents taking a lead through the Neighbourhood Plan process, not by a predatory developer imposing a large housing estate in an unsuitable location.

Yours sincerely,

**On behalf of Stowupland Parish Council**

Mrs Claire Pizzey  
Parish Clerk

## Appendix

### Extracts from Alison Farmer Associations Stowupland Landscape Appraisal commissioned for the Neighbourhood Plan that relate to Land West of Thorney Green Road

**5.4.19.** The rural character of land north of the B1115 is critical in this function and this landscape is considered to have a medium sensitivity. The development of housing onto the upper slopes adjacent to the A14 has reduced the capacity of this landscape to accommodate further development. Any development in this landscape is likely to undermine a sense of separation and any sizable estate development would be atypical of traditional settlement pattern, exacerbating the influences of existing estate development at the Heights and Stowmarket. The provision of public open space between Stowmarket and Stowupland along the B1115 should also be considered with care as this may still alter current perceptions of rural open character and is likely to have an urbanising influence.

**5.4.20.** While north of the B1115 it is important to retain the rural open character of area and outward views/connectivity to the wider landscape to the northwest. Here the reinforcement of field boundaries with hedgerow planting in order to strengthen landscape character, soften the current urban edge along Thorney Green Road, improve footpath network and ecological corridors is a priority. There are also opportunities to plant a distinctive avenue of trees along the B1115 to create a stronger sense of place and arrival.

**5.5.1.** This assessment has revealed that the capacity of the Parish as a whole to accommodate development of a high density estate type is very limited without loss of character and significant detriment to valued qualities. Whilst future housing estates may be argued as matching the character of existing housing estates they adjoin (in terms of form, density and height) care should be taken to critically review the extent to which housing of this type can effectively support the valued character of the village and of the Parish. Currently the historic character of the village, comprising a loose low density arrangement around open space remains tangible, however continued estate development is likely to tip this balance such that higher density development becomes the more prevalent form and thus a defining character. Such a change is also likely to blur the distinction between Stowmarket and Stowupland village. If the values identified in para 6.2.1 below are important to conserve and enhance then care should be taken to avoid this outcome. This does not mean to say that the Parish cannot accommodate development but rather that alternatives to estate development need to be considered and that creatively designed, small scale proposals are likely to be more easily integrated within the rural character of the settlement and Parish.

**6.2.1** The following special qualities have been noted in the Parish as a result of this landscape appraisal:

- long distance elevated views from the edge of the plateau;
- rural landscape with dispersed pattern of development often loosely arranged with rural landscape flowing between small groups of dwellings;
- rural narrow lanes with grass verges;
- interrelationship between upland plateau and areas of stream valley offering long distance scenic views;
- wedges of open space penetrating urban form such that green space dominates the built form in the historic parts of Stowupland village - perceptions of the proportion of open space to built form are significant;
- Water is a key theme occurring as ponds, ditches and streams;
- Separate identity to Stowmarket.

**From:** Michelle Marshall [mailto:Michellelm@stowmarket.org]  
**Sent:** 20 April 2017 09:32  
**To:** Planning Admin  
**Subject:** Planning applications

Please see below for comments regarding recent planning applications:

4455/16

The Town Council wishes to reiterate its previous comments in respect of the planning application and record its gratitude that the developer had taken into account comments made in respect of the application, with the submission of these amendments.

5024/16

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

i) That the proposed development would have a serious detrimental effect on local services including:

- Education;
- Health provision;
- Open space, sport and recreational provision;
- Library services; and
- Sewerage and drainage

ii) That the proposed development would have a serious detrimental effect on the local road network.

1113/17

No objection be raised to the grant of planning consent.

1135/17

No objection be raised to the grant of planning consent.

1181/17

No objection be raised to the grant of planning consent.

1182/17

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



@stowmarketTC



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Your Ref: MS/5024/16  
Our Ref: 570\CON\1216\17  
Date: 20 April 2017  
Highways Enquiries to: colin.bird@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**  
Email: planningadmin@baberghmidsuffolk.gov.uk

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

**For the Attention of: James Platt**

Dear James

**TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/5024/16**

**PROPOSAL:** Outline planning application with all matters reserved for the erection of up to 85 dwellings with associated parking, landscaping, open space and surface water attenuation.

**LOCATION:** Land west of, Thorney Green Road, Stowupland

**ROAD CLASS:**

The recommended conditions relating to the access to this application, and required street lighting on the B1115, remain as given in my response to application 0195/16, dated 10 March 2016.

The recommended S106 contributions for improvements to rights of way remain as given in my response to application 0195/16 dated 10 March 2016.

Given the effect of this development on the junction of the A1120/B1115 I required additional assessment to be carried out by the applicant. I have now considered the revised TA and accept the conclusions that the junction improvement, as conditioned by the Inspector in his response to the appeal for site ref 3112/15, would provide the required mitigation to make this application acceptable.

I have recommended this junction be secured by condition below which should be applied to any approved development served off the access which forms part of the separate application ref. 0195/16 and remove my Section 106 requirement for a £20k contribution as stated in my letter dated 10 March 2016.

The applicant should note that for the reserved matters we will be seeking pedestrian and cycling permeability between the two application sites and the indicative drawing which appears to show all ped/cycle movements channelled through a single access point.

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

1

No part of the development shall be commenced until details of a scheme to improve the junction of the A1120 and B1115 (to include kerb realignment and carriageway widening) have been submitted to and approved in writing by the Local Planning Authority unless such a scheme has been previously constructed to the satisfaction of the Local Planning Authority. The approved works to the junction shall be laid out and constructed in their entirety prior to the occupation of the 50<sup>th</sup> dwelling constructed on the application site unless such a scheme has previously constructed.

Reason: To reduce the impact of the development on the highway

2 B2

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

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

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 HGV1

Condition: All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

6 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.

7 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.

8 P 2

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

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

9

Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Information Pack. No less than 3 months prior to the first occupation of any dwelling, the contents of the Residents Travel Information Pack shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information and a multi-modal travel voucher. The Residents Travel Information Pack shall be maintained and operated thereafter.

Reason: In the interest of sustainable development.

Yours sincerely,

**Mr Colin Bird**  
**Development Management Engineer**  
Strategic Development – Resource Management

Your Ref: MS/0195/16  
Our Ref: 570\CON\0183\17  
Date: 13 June 2017  
Highways Enquiries to: colin.bird@suffolk.gov.uk



**Suffolk**  
County Council

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

**For the Attention of:** James Platt

Your Ref: MS/0195/16

Our Ref: 570\CON\0183\17

Date: 13 June 2017

Highways Enquiries to: colin.bird@suffolk.gov.uk

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

Email: planningadmin@babberghmidsuffolk.gov.uk

Dear James

**TOWN AND COUNTRY PLANNING ACT 1990**

**CONSULTATION RETURN MS/0195/16**

**PROPOSAL:** Outline application for residential development of up to 58 dwellings and a new vehicular access off the B1115. All matters to be reserved with the exception of the main site access

**LOCATION:** Land west of, Thorney Green Road, Stowupland

**ROAD CLASS:**

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

For clarification, I confirm my consideration of applications 0195/16 and 5024/16 includes consideration of the highway impacts of the committed development at land between Gipping Road and Church Road (ref. 3112/15) which was included by the applicant as committed development in the Transport Assessment Addendum submitted for 5024/16 in March 2017.

## James Platt

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**From:** Colin Bird  
**Sent:** 18 July 2017 14:01  
**To:** James Platt  
**Subject:** 0195/16 Land West of Thorney Green Road

James

Further to my previous responses, and in the interest of ensuring safe access to the development for construction traffic and pedestrians we would recommend the following revised/additional conditions;

### Revised

1. Condition: No part of the development shall be commenced until details of the proposed access to the B1115 (including the position of any gates to be erected and visibility splays provided) have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to the commencement of the development.

Thereafter the access shall be retained in its approved form.

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

### Additional

2. Condition: Before the development is commenced details of the widening of the existing footway along the west side of Thorney Green Road for the length between the property "Oak Fields" to the north and the junction with the B1115 to the south to a minimum width of 1.8m shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before first occupation of the development.

Reason In the interest of safe pedestrian access to the development.

Regards

Colin Bird  
Development Management Engineer  
Resource Management  
Suffolk County Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

Tel 01473 260400  
Fax 01473 216864

Please note I do not work Mondays or Fridays. If your inquiry is urgent you could email [developmentcontrol@suffolk.gov.uk](mailto:developmentcontrol@suffolk.gov.uk) and a colleague may be able to help.



**Developments Affecting Trunk Roads and Special Roads  
Highways England Planning Response (HEPR 16-01)  
Formal Recommendation to an Application for Planning Permission**

**From:** Martin Fellows  
Operations (East)  
[planningee@highwaysengland.co.uk](mailto:planningee@highwaysengland.co.uk)

**To:** Mid Suffolk District Council

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

**Council's Reference:** 5024/16


Referring to the planning application referenced above, dated 9 January 2016, application for the erection of up to 85 dwellings with associated parking and the provision of open space and surface water attenuation, Land West of Thorney Green Road, Stowupland, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

<b>Signature</b> 	<b>Date:</b> 23 January 2017
<b>Name:</b> David Abbott	<b>Position:</b> Asset Manager
<b>Highways England:</b> Woodlands, Manton Lane Bedford MK41 7LW	
david.abbott@highwaysengland.co.uk	

**From:** RM PROW Planning  
**Sent:** 27 January 2017 16:43  
**To:** Planning Admin  
**Cc:** Christopher Fish; Francesca Clarke; nick@newhall.uk.com  
**Subject:** RE: Consultation on Planning Application 5024/16

**Our Ref: W499/031/ROW958/16**

**For The Attention of: James Platt**

**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.

Public Footpath 31 is recorded through the proposed development area.

Should planning permission be granted, we request the following are conditioned:

At the point where the access road crosses the public footpath, dropped kerbs and signage is to be installed, for public ease of use and safety.

Public Footpath 31 currently slopes and is uneven; the route is to be levelled and improved. Rights of Way & Access, as Highway Authority will need to agree and approve the specification. This will ensure better access for all residents. The application form is attached.

**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

<http://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)

For great ideas on visiting Suffolk's countryside visit [www.discoversuffolk.org.uk](http://www.discoversuffolk.org.uk)

# Consultee Comments for application 5024/16

## Application Summary

Application Number: 5024/16

Address: Land west of Thorney Green Road, Stowupland

Proposal: Hybrid planning application that seeks: (a) Outline planning permission for the erection of up to 85 dwellings with associated parking. All matters reserved.(b) Full planning permission for provision of open space and surface water attenuation.

Case Officer: James Platt

## Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address:

Email:

On Behalf Of: Ramblers Association - Bob Boardman (temp cover)

## Comments

I have viewed these plans and although provision has been made to accommodate the existing footpath system, namely FP nos. 29,30,31 & 57, the open aspect of walking in this area will be totally lost with a trape through more suburbia.

**From:** Jason Skilton  
**Sent:** 06 June 2017 10:14  
**To:** X Delete Aug 17 - Planning Emails <planningcontrol@baberghmidsuffolk.gov.uk>  
**Cc:** James Platt <James.Platt@baberghmidsuffolk.gov.uk>  
**Subject:** 2017-06-06 JS Reply Land West Of Thorney Green Road, Stowupland Ref 5024/16

Dear James Platt,

**Subject: Land West Of Thorney Green Road, Stowupland Ref 5024/16**

Suffolk County Council, Flood and Water Management have reviewed application ref 5024/16

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

1. Flood Risk Assessment & Sustainable Drainage Strategy & Appendices – Ref 1636-FRA & DS – Site 2 – Nov 2016
2. Infiltration Test Results – Dated 18<sup>th</sup> May 2017
3. MTC Engineering letter ref MJB/1636 – 10<sup>th</sup> March 2017
4. Location Plan – Ref 016.SK.02 P6
5. Indicative Site Layout - Ref 016.SK.11 Rev P6

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
  - a. Dimensioned plans and drawings of the surface water drainage scheme;
  - b. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to  $Q_{bar}$  or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
  - c. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
  - d. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
  - e. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
2. The scheme shall be fully implemented as approved.

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

3. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage

scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

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

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

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

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

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

#### Informatives

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

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

OFFICIAL



5024/16  
**Suffolk Fire and Rescue Service**

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

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

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

Date: 24 January 2017

**Planning Ref: S106 + 5024/16**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land West of Thorney Green Road, Stowupland**  
**DESCRIPTION: 85 Dwellings**  
**NO: HYDRANTS POSSIBLY REQUIRED: Required**

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

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

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

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

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

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

Continued/

OFFICIAL

5024/16



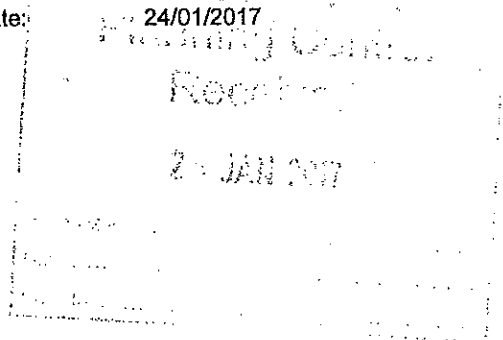
**Suffolk Fire and Rescue Service**

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

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

Your Ref:  
Our Ref: FS/F221363  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 24/01/2017



Dear Sirs

**Land West of Thorney Green Road, Stoupland**  
**Planning Application No: S106 + 5024/16**

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/

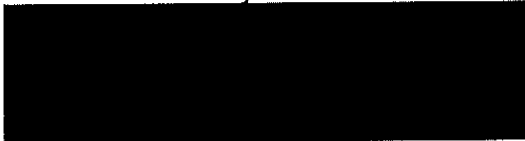
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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information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

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

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

Yours faithfully



Mrs A Kempen  
Water Officer

Enc: PDL1

Copy: Mr N Fairman, New Hall Properties Ltd, The North Wing, Ingatestone Hall, Hall Lane, Ingatestone CM4 9NS  
Enc: Sprinkler information

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

Your ref: 5024/16  
Our ref: Stowupland – land west of Thorney  
Green Road 00049200  
Date: 22 January 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

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

Dear James,

**Stowupland: land west of Thorney Green Road – developer contributions**

I refer to the hybrid planning application that seeks: (a) outline planning permission for the erection of up to 85 dwellings with associated parking. All matters reserved (b) full planning permission for provision of open space and surface water attenuation.

This letter sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site specific mitigation.

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

Site specific matters will be covered by a planning obligation or planning conditions.

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

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

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



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

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

### **Community Infrastructure Levy**

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

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

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

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

The details of the impact on local infrastructure serving the development is set out below and will form the basis of a future CIL bid for funding:

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

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

SCC anticipates the following minimum pupil yields from a development of 85 dwellings, namely:

- a. Primary school age range, 5-11: 21 pupils. Cost per place is £12,181 (2016/17 costs).

- b. Secondary school age range, 11-16: 15 pupils. Cost per place is £18,355 (2016/17 costs).
- c. Secondary school age range, 16+: 3 pupils. Costs per place is £19,907 (2016/17 costs).

The local catchment schools are Freeman County Primary School and Stowupland High School.

Based on existing forecasts SCC will have no surplus places available at the catchment primary or secondary schools for which CIL funding of at least £590,847 (2016/17 costs) will be sought.

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

In this Ward there is currently a surplus of places available.

Please note that the early years pupil yield ratio of 10 children per hundred dwellings is expected to change and increase substantially in the near future. The Government announced, through the 2015 Queen's Speech, an intention to double the amount of free provision made available to 3 and 4 year olds, from 15 hours a week to 30.

- 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.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via

Section 38 and Section 278. This will be coordinated by Suffolk County Council  
FAO Christopher Fish.

Site specific matters will be covered by a planning obligation or planning conditions.

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

5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £18,360, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of  $(30 \times £3,000) = £90,000$  per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition 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 local planning authority's housing team to identify local housing needs.

8. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

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

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

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

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

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

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the

development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.


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

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

The above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

I would be grateful if the above information can be provided to the decision-taker in respect of this planning application.

Yours sincerely,

  
Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Strategic Development – Resource Management

cc Carol Barber, Suffolk County Council  
Christopher Fish, Suffolk County Council  
Floods Planning, Suffolk County Council

**From:** Infrastructure Team (Babergh Mid Suffolk)  
**Sent:** 18 January 2017 15:52  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 5024/16

FAO James Platt

Community Infrastructure Levy (CIL) is assessed upon grant of Reserve Matters permission. Residential development in this area is subject to the CIL Residential rate of £115 (indexed). A s106 agreement will be required to secure Affordable Housing and any infrastructure that is **not** on the R123 List that is necessitated by this development.

The R123 list, which shows which types of infrastructure **are** funded by CIL, can be viewed on the Council's website here:

<http://www.midsuffolk.gov.uk/assets/UploadsMSDC/Economy/CIL/MSDC-123-list-Jan-2016.pdf> .

Kind regards

**Angharad Firth**  
Infrastructure Support Officer  
Infrastructure Team  
**Babergh and Mid Suffolk District Council – Working Together**

Mob: 07710854584  
Tel: 01449 724978

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

Email address: [kerryharding@nhs.net](mailto:kerryharding@nhs.net)

Telephone Number – 0113 824 9111

Your Ref: 16/5024

Our Ref: NHSE/MIDS/16/5024/KH

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

26 January 2017

Dear Sirs,

**Re- Consultation-Outline planning application with all matters reserved  
for the erection of up to 85 dwellings with associated parking,  
landscaping, open space and surface water attenuation.  
Land west of Thorney Green Road, Stowupland**

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

**Background**

2. The proposal comprises a development of up to 85 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

**Review of Planning Application**

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

**Healthcare Impact Assessment**

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

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

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

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
Combs Ford Surgery	8,450	378.50	5,520	-200.93
Stow Health	18,773	1,000.00	14,583	-287.29
<b>Total</b>	<b>27,223</b>	<b>1,378.50</b>	<b>20,103</b>	<b>-488.22</b>

**Notes:**

1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
  2. Current Net Internal Area occupied by the Practice.
  3. Based on 120m<sup>2</sup> per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
  4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment or extension 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

*High quality care for all, now and for future generations*



# SUFFOLK CONSTABULARY

Secured by Design



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

## Planning Application (5024/16)

**SITE: 85 Dwellings at land west of Thorney Green Road, Stowupland**

**Applicant: New Hall Properties (Eastern) Ltd, Ingatstone**

**Planning Officer: Mr Philip Isbell**

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

Dear Mr Isbell

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 85 dwellings on land west of Thorney Green Road, Stowupland.

I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act.

At this stage I feel I do not have the level of detail I require to make specific comments in relation to 'designing out crime' for this outline application. However, I recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation. Further information can be found at [www.securedbydesign.com](http://www.securedbydesign.com).

I would further strongly advise the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

My specific observations for this development are that the properties are densely situated. I would like to see a less formal row of housing and a design more in keeping with that of a cul-de-sac, where the housing is separately positioned in a semi-circular area.

I trust there will be no footpaths to the rear of any of these properties, as it is a well-known fact that such paths are generators for crime.

I would like to know more detail as to how the perimeter will be secured on the southern side nearest to the B1115 including the A14 dual carriageway and eastern side bordering the open fields.

NOT PROTECTIVELY MARKED  
RESTRICTED/CONFIDENTIAL

I would recommend the rear of each property comprises 1.8m close boarded fencing, or at the very least 1.5m close boarded fencing accompanied by further 300 cm high trellis.

I would also like to see 1 metre metal hooped railings around the communal areas.

## 1.0 SECURE BY DESIGN (SBD)

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

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

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

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

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

## 2.0 REFERRALS

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

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

2.13 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.**

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

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

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such

footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

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

### **2.3 Department for Transport – Manual for Streets (Crime Prevention)**

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

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

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

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

### **3.0 GENERAL COMMENTS ON PROPOSED PLAN**

My specific observations for this development are as follows: (Further details of the following recommendations can be found in the above SDB document "Homes 16").

- 3.1** I would like to know how the perimeters will be comprised for the outer perimeter of the site, especially at the southern end by the B1115 including the A14 dual carriageway and eastern side by the adjoining fields.

- 3.2 I would like more information on the perimeters for each property and ask that all the rear of properties are secured with 1.8m close boarded fencing, or at least 1.5m close boarded fencing with additional further 300cm high trellis.
- 3.3 I would like to see a less formal row of housing and a design more in keeping with that of a cul-de-sac, where the housing is separately positioned in a semi-circular area.
- 3.4 I would like to see properties with gable end windows that look onto public spaces, to provide natural surveillance, especially for the communal space area.
- 3.5 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 flooring tested to **BS EN1177** standards.
- 3.6 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.
- 3.7 All litter bins should be of a fire retardant material.
- 3.8 Attention should be paid to the sighting and fixing of **Gates, Fences, Seats and Pathways**. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.
- 3.9 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.
- 3.10 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).

#### 4.0 **CONCLUSION**

- 4.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 4.2 As of the 1<sup>st</sup> 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)
- 4.3 SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards. It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>.
- 4.4 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
  - a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.

- b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
- c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, or STS204 Issue 3:2012, or LPS1175 Issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

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

## **5.0 FINAL CONCLUSION**

**As I do not have sufficient information on the proposed planning application, I can neither approve, nor object to this proposed plan.**

**I hope the planners will adopt Secure By Design standards and apply for Secure by Design National Building Approval membership.**

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

Yours sincerely,



Phil Kemp

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

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

08/02/2017

For the attention of: James Platt

**Ref: 5024/16; Land west of Thorney Green Road, Stowupland**

Thank you for consulting us on the outline planning application for the erection of up to 85no. dwellings with associated parking, landscaping, open space and surface water attenuation.

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

#### **Recommendations**

In terms of the likely visual effect on the surrounding landscape, the proposals will inevitably have an impact on the existing rural edge character of Stowupland. The main development constraint is the requirement to ensure an acceptable amount of separation between Stowmarket and Stowupland remains, where (according to page 39 of the adopted Mid Suffolk Stowmarket Area Action Plan, February 2013) the "character and appearance should be safeguarded through the application of good design and landscape design principles".

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

- 1) If the outline application is approved, the transition between the existing residential areas and proposed development need to be explored at in a greater level of detail, to provide suitable levels of screening and the appropriate specification of planting which addresses the character of the surrounding landscape,
- 2) A landscape strategy needs to be produced which conforms to the principles established within the Stowmarket Area Action Plan, specifically relating to establishing adequate landscape separation between Stowupland and Stowmarket and the integration of the proposed landscape between the two development sites (ref: 5024/16 and 0195/16),
- 3) A detailed green infrastructure plan needs to be produced which demonstrates how the proposals (including existing public rights of way) link with the residential and movement network, in order to create an appropriate public realm and provide suitable levels of amenity space,
- 4) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted as part of a planning condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, (ideally 5 years) to support plant establishment,
- 5) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved.

#### **The proposal**



The outline planning application and supporting documents set out proposals for the erection of up to 85no. dwellings with associated parking, landscaping, open space and surface water attenuation. The site is located on the western edge of Stowupland and adjoins the village settlement boundary. Stowmarket lies 2 km west of Stowupland. The site extends to 4.03 ha, is roughly rectangular in shape and is partly screened by existing hedges and trees along its northern and western boundaries. The sites topography is gently sloping towards the A14, which includes some height variation between each of the existing field parcels. The current use of the land is agriculture.

#### **Review on the submitted information**

Relevant to this landscape review, the submitted application includes a Landscape Visual Appraisal, Indicative Site Layout and Design and Access Statement.

The Landscape Visual Appraisal has been produced to the appropriate guidance. The report includes mitigation measures which are appropriate and should be used to inform and influence any detailed future development layout of the site.

As part of the outline application submission the indicative site layout plan shows the areas designated for residential development and open space including attenuation pond as part of SuDS, which is located within the lowest areas of the site. The indicative layout fails to suitably demonstrate how an appropriate and connected green infrastructure responds to the layout. As these proposals develop to a greater level of detail will be required, especially the connectivity between the green spaces and enclosure along the site boundary.

#### **Likely impact on the surrounding landscape**

The site is located to the north of B1115 and east of the A14 which provides boundaries to both movement and habitat connectivity.

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Ancient Plateau Claylands landscape character type, with the Rolling Valley Farmland and Furze landscape character type given to the Gipping valley. Some of the key characteristics for the Ancient Plateau Claylands landscape character type are flat or gently rolling arable landscape dissected by small river valleys, field pattern of ancient enclosure, loosely clustered villages, scattered ancient woodland parcels and hedgerow with hedgerow trees. There is an expectation that many of these landscape principles will be designed into the emerging development proposals.

As part of a site visit and appraisal it is clear that the openness of the southern boundary and the impact any development will have alongside the route of the B1115 will create a particularly exposed boundary edge. The other key sensitive edge is the eastern boundary along Thorney Rd, where the existing dwellings will overlook the proposed development. Elsewhere, views along the existing public rights of way will also be greatly affected.

#### **Proposed mitigation**

There are opportunities to create small woodland parcels within the development area and hedgerow planting along the site boundaries to mitigate the visual impact of the proposals and create a suitable green infrastructure. The site already benefits of existing hedgerow and tree planting to the north and western boundaries which should be strengthened with new planting.

The indicative layout includes 20m woodland to provide a physical and visual buffer to Stowmarket to the immediate west of the site. It also shows an area of water attenuation and green open space, but fails to adequately demonstrate how landscape has been integrated into the development area of the site. Integrated tree planting and landscaping will be crucial in reducing the impact of the development within the country edge setting of the site.

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



Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI  
Landscape Architect Consultant  
Telephone: 03330136858  
Email: almudena.quiralte@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.





## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	5024/16 Thorney Green Road, Stowupland	
<b>2</b>	<b>Date of Response</b>	15.6.17	
<b>3</b>	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> <li>1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> <li>• less than substantial harm to a designated heritage asset because it would detract from the rural setting and character of the listed buildings on Thorney Green Road; the level of harm is considered moderate.</li> </ul> </li> <li>2. The Heritage Team recommends that revised layouts be prepared.</li> </ol>	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>I have been asked to give a final comment on this application and that at the adjacent site. I find no reason to alter the assessment and conclusion of my comment of 21.2.17, but have taken opportunity to refer to the Heritage Statement, make a correction in one place, re-state the level of harm, and consider the potential cumulative harm from both proposals.</p> <p>Decision-takers should be mindful of the specific legal duty of the local planning authority to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses, as set out in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Recent court decisions have confirmed that this amounts to a strong presumption against any harm. Accordingly the NPPF also gives great weight, its highest rating, to conservation of designated heritage assets and their settings.</p> <p>On the basis of the application documents, the proposal would potentially affect the following heritage assets: Poole's Farmhouse (listed grade II), 28 Thorney Green Road (listed grade II) and Oak Farmhouse (listed grade II), and Thorney Green (undesignated historic green).</p> <p>Thorney Green is a large and striking example of unenclosed common with a scatter of historic farmsteads around its edge. This pattern of development is recognised as a distinctive characteristic of the ancient</p>	

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

	<p>plateau clayland area in the Suffolk Historic Landscape Assessment. Poole's farmhouse is one of these farmsteads, but its setting is compromised by 1900s development to its south and it is considered that the proposal would not materially harm its setting and significance. Similarly, perception and appreciation of Thorney Green itself would not be affected.</p> <p>No 28 Thorney Green Road and Oak Farmhouse historically belong together as a farmhouse and a detached service building ('backhouse'). They stand a little distance from the entrance of the Green and should properly be regarded as an isolated roadside farmstead, also recognised as characteristic of scattered settlements in the ancient plateau clayland. They are embedded in the 1900s housing development on the east of Thorney Green Road, but relate visually to the open landscape opposite. In particular from the footpath along the edge of the site they can be readily appreciated as an essential element of the rural landscape with historic links of function; the thatched roof is a prominent and strong reminder of the intimate connections between traditional buildings and surrounding farmland which may have provided thatching straw as a by-product.</p> <p>The proposal would essentially fill the the site, leaving a green buffer which seems to tacitly acknowledge risk of harm to the setting of Oak Farmhouse and No.28. The effect would severely compromise the buildings' remaining connection with the historic rural hinterland, which would not be mitigated by plantation of trees.</p> <p>In summary, the proposal would severely compromise the remaining link between the listed farmhouse and its associated backhouse and their rural surroundings, and would impair appreciation of their historic agricultural function and context. Since the setting of the listed buildings is compromised, its contribution to their significance is considered moderate. Since the proposal would largely remove this contribution, harm to significance is also considered moderate, that is mid-way between high and low. In accordance with the statutory duty you should give great weight to the presumption against harm, and in accordance with the NPPF you should consider whether further steps could be taken to minimise harm, whether justification is clear and convincing, and whether public benefits would outweigh this and other harm.</p> <p>It does seem possible that parts of the site could be developed without risk of serious impact on the setting of the listed buildings, and I would appreciate opportunity to</p>
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		<p>comment on revised layouts.</p> <p>Since a similar proposal has been made on adjacent land it seems appropriate to address the potential for cumulative impact. Harm arising from the other proposal is considered modest, but as the combined impact would remove all rural context for the two listed buildings apart from a modest undeveloped area, cumulative harm would be considered above moderate.</p> <p>Justification</p> <p>A heritage statement is now submitted addressing the impact of this application and that on the adjoining site (0195/16), although in assessing the contribution of setting to the significance of the buildings there is still over-reliance on visual factors. Nonetheless the statement's broad conclusion is in line with our own advice that there is harm and that steps should be taken to avoid and mitigate the harm.</p>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<p><b>Recommended conditions</b></p>	

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

SUFFOLK

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*Respecting the past, shaping the future*

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15 May 2017

Mr Philip Isbell  
Corporate Manager - Development Management  
Mid Suffolk District Council  
High Street  
Needham Market, IP6 8DL

FAO James Platt

Dear Mr. Isbell,

**Planning applications, Land west of Thorney Green Road, Stowupland:**

**0195/16 Outline application for residential development of up to 58 dwellings and a new vehicular access off the B1115.**

**5024/16 Outline planning application for the erection of up to 85 dwellings.**

Thank you for consulting the Suffolk Preservation Society ('the Society') on the amendments to applications for 58 and 85 dwellings on adjoining sites west of Thorney Green Road. The Society has previously raised objections based on the location on greenfield land which serves as a buffer between Stowupland and Stowmarket, and on the inadequate heritage assessment (letters dated 22 April 2016 and 31 January 2017). Whilst we continue to object to the schemes on the grounds of coalescence of Stowmarket and Stowupland, we welcome the recent submission of the appropriately detailed heritage assessment which we had called for. We note that the setting of heritage assets, in particular 28 Thorney Green Road and Oak Farmhouse, has now been assessed by the applicant more fully and concur that less than substantial harm will result from the development of the last remaining open land in these assets' setting.

Notwithstanding Mid Suffolk's lack of a 5 year supply of housing land, footnote 9 of NPPF para 14 allows for policies within the NPPF protecting heritage assets from harmful development to be applied. Moreover we would remind the lpa that Historic England's 2015 Good Practice Advice (Note 3) on Setting of Heritage Assets makes clear "*that a negative cumulative change could include severing the last link between an asset and its original setting.*" It is a matter of judgement to weigh in the balance the public benefit of the proposed housing against the demonstrable harm, however we urge that, if the lpa is minded to approve these outline applications, the reserved matters of layout, appearance and landscaping maximise the set back and open space around these listed buildings in order to minimise harm and allow the assets to be appreciated in an open setting.

We trust that you will find these comments helpful in the assessment of this case.

Yours sincerely,

**Bethany Philbidge**  
**BSc (Hons) MSc (Town Planning)**  
**Planning Officer**

Cc: Stowupland Parish Council  
Phil Butler - SPS Mid Suffolk District  
District Councillor – Keith Welham  
Heritage Team

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

Philip Isbell  
Corporate Manager - Development Manager  
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Mid Suffolk District Council  
131 High Street  
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Enquiries to: Rachael Abraham  
Direct Line: 01284 741232  
Email: [Rachael.abraham@suffolk.gov.uk](mailto:Rachael.abraham@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016\_5024  
Date: 20 January 2017

For the Attention of James Platt

Dear Mr Isbell

**Planning Application 5024/16 – Land west of Thorney Green Road, Stowupland:  
Archaeology**

This large development site in an area of archaeological potential as recorded by information held by the County Historic Environment Record (HER). The proposed development area is situated to the north of the Cedars Park development, where archaeological investigations uncovered extensive multi-period remains (SKT 018, 029, 030, 036, 037, 063). A geophysical survey carried out at the site has detected anomalies which are likely to be of archaeological origin and are indicative of a series of ditches, enclosures and pits (SUP 033). As a result, there is high potential for encountering archaeological remains at this location and the proposed works would cause significant ground disturbance that has potential to damage any archaeological deposit and below ground heritage assets that exist.

At pre-application stage, we advised that this site should be subject to trial trenched evaluation prior to the determination of any submitted applications, in order to accurately quantify the archaeological resource (both in quality and extent) which survives at the site and also to ground truth the geophysical survey results. However, we note that an outline application has been submitted for the site, which gives some flexibility in the final development design should significant archaeological remains be encountered at the site. In addition, a significant proportion of the area of likely archaeology identified by the geophysical survey in the northern field, is currently designated as green space. The route of the access road in the southern field, also avoids the main concentration of likely archaeology identified in the geophysical survey.

Therefore on balance, there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be

the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

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

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

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

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

**REASON:**

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

**INFORMATIVE:**

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation (a 4% sample of the full development area) will be required to establish the potential of the site, **before approval of layout and drainage under reserved matters**, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation. **We would strongly advise that evaluation is undertaken at the earliest opportunity.**

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

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



Yours sincerely,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: James Platt, Development Management

FROM: David Harrold, Environmental Protection Team    DATE: 15/06/2017

YOUR REF: 5024/16/OUT

SUBJECT: Land West of Thorney Green Road, Stowupland. EH – Other Issues

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Thank you for consulting me on the above outline application for residential development comprising 85 dwellings.

The site may to some degree be affected by day and night time road traffic noise from the A14 dual carriage way. Although a site specific noise report has not been submitted I am mindful of the acoustic report submitted by the applicant for the neighbouring site (Plan ref 0195/16/OUT) which is intrinsically linked.

The report by Loven Acoustics (LA) dated 14 December 2016 is an assessment of the suitability of the adjoining land for residential development and in particular the impact from road traffic noise on the A14 dual carriageway and B1115 which leads into Stowupland.

The report by LA considers the ambient daytime and night time noise levels at noise sensitive premises and makes theoretical calculations of the impact of sound from road traffic on both external and internal noise levels of the proposed dwellings. The report relies upon British Standard 8233 (Guidance on Sound Insulation and Noise Reduction for Buildings) and the World Health Organisation guidance on community noise. This is a reasonable and robust approach.

The assessment concludes that with suitable façade treatment in the form of acoustic glazing and good quality trickle ventilation, acceptable internal noise levels can be achieved. In addition, an acoustic barrier will be sufficient protection to achieve acceptable guideline noise levels for external amenity areas (gardens) for specific dwellings near to the A14 and B1115 roads.

With regard to noise I therefore do not have any objection to the proposed development. I would, however, recommend that any approval is subject to the following conditions:

1. The residential accommodation shall be constructed so as to provide sound insulation against external noise levels to achieve internal noise levels not exceeding 30 dB LAeq (night) and 45 dB L<sub>A</sub>max (measured with F time weighting) for bedrooms, and 35 dB LAeq (day) for other habitable rooms, with windows shut and other means of ventilation provided. Construction of the residential premises shall not commence until such a scheme demonstrating the achievement of these standards has been submitted to the Local Planning Authority and approved in writing
2. An acoustic barrier should be constructed (if necessary) so as to provide sound mitigation against external road traffic noise to achieve 55 dB LAeq (day) in external amenity areas (gardens) of residential premises. Construction of the residential premises shall not commence until such a scheme demonstrating the achievement of this standard has been submitted to the Local Planning Authority and approved in writing

Reason: to protect the future occupiers of noise sensitive dwellings from adverse impacts of road traffic noise.

I also note that the application site is in close proximity to a number of existing and proposed residential premises which the development may have an adverse impact on during its construction phase.

I would, therefore, recommend that should planning permission be granted, a construction management plan be required by means of the standard condition:

Such a plan shall include details of:

1. Operating hours which should include delivery vehicles (times usually 08:00 hrs – 18:00 hours Monday to Friday, 09:00 hours – 13:00 hours Saturday, with no working on Sunday or Bank Holidays),
2. Means of site access, traffic routes, vehicle parking and manoeuvring areas, loading and unloading of plant and materials, wheel washing facilities,
3. Lighting,
4. Location and nature of compounds and storage areas,
5. Waste removal,
6. Temporary buildings,
7. Dust and Noise management during the construction phase.

The construction management plan should cover both the site preparation and construction phase.

Reason: to protect occupiers of existing and proposed dwellings from adverse impacts of construction activity on the development site.

I trust this advice is of assistance. Should you require any further advice or assistance in drafting the above conditions, please do not hesitate to contact me.

David Harrold MCIEH  
Senior Environmental Health Officer

**From:** Nathan Pittam  
**Sent:** 20 January 2017 10:42  
**To:** Planning Admin  
**Subject:** 5024/16. EH - Land Contamination.

**M3 : 189064**

**5024/16. EH - Land Contamination.**

**Land west of, Thorney Green Road, Stowupland, STOWMARKET, Suffolk.**

**Hybrid planning application that seeks: (a) Outline planning permission for the erection of up to 85 dwellings with associated parking. All matters reserved.(b)**

**Full planning permission for ...**

Many thanks for your request for comments in relation to the above application. Having reviewed the Phase I report I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions be 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  
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Date: 10 January 2017  
Our ref: 205431  
Your ref: 5024/16



James Platt  
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**BY EMAIL ONLY**

Dear Mr Platt

**Planning consultation:** Hybrid planning application that seeks: (a) Outline planning permission for the erection of up to 85 dwellings with associated parking. All matters reserved.(b) Full planning permission for provision of open space and surface water attenuation.

**Location:** Land west of Thorney Green Road, Stowupland

Thank you for your consultation on the above dated 05 January 2017 which was received by Natural England on 05 January 2017.

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**

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

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

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

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto: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 sincerely  
Jacqui Salt  
Consultations Team



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26/01/2017

Dear James,

**RE: 5024/16 (a) Outline planning permission for the erection of up to 85 dwellings with associated parking, all matters reserved. (b) Full planning permission for provision of open space and surface water attenuation. Land west of Thorney Green Road, Stowupland**

Thank you for sending us details of this application. We have read the ecological survey report (T4 Ecology Ltd, November 2016) and we note the findings of the consultant. We have the following comments on this proposal:

#### Hedgerows

We note that the northern boundary of the site is marked by a hedgerow and ditch, from the indicative site layout plan it appears that this feature will potentially form part of the garden boundaries of the dwellings in this part to the proposed development. Hedgerows are a UK and Suffolk Priority habitat and are given protected under the Hedgerow Regulations (1997), additional provision also exists under the Regulations for protecting hedgerows which meet the criteria of 'important'. We recommend that the hedgerows on this site are assessed to determine whether they meet the criteria of 'important' under the Regulations.

Irrespective of whether these are 'important' hedgerows, they are a UK and Suffolk Priority habitat and therefore should be protected from any adverse impacts resulting from development. We recommend that, should the principle of development in this location be considered acceptable, any hedgerows are kept outside of domestic curtilages, incorporated into areas of green space and managed to maximise their value for wildlife.

#### Protected and/or UK and Suffolk Priority Species

Whilst we are satisfied with the majority of the findings within the ecological survey report, we note that reference is made to the potential for the site to support skylark, a UK and Suffolk Priority species. Although the report makes reference to the need for mitigation for the loss of habitat for this species, no further detail on this or assessment of the likely impacts of the proposed development on skylark is presented. Any consented development should secure appropriate levels of compensation for this species. This is often achieved through the use of skylark plots in adjacent fields which compensate for the potential loss of nesting or foraging habitat (specification to match the Countryside Stewardship option AB4).

#### Lighting

The ecological consultant recommends a sympathetic lighting scheme. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained through the site for foraging and commuting bats. We recommend that Suffolk County Council's

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street lighting strategy is used as a basis for street lighting layout and design, alongside the recommendations made in the ecological survey reports.

#### Green Space

We note that part of the site will form green space with Sustainable Urban Drainage Systems within this space. We recommend that these areas are designed to maximise their value for wildlife, and that their long term beneficial management is secured through the implementation of an appropriate management plan. Any landscape planting should utilise appropriate native species of local provenance.

#### Ecological Enhancements

Although this site is currently of relatively low ecological value, it is still a substantial area of undeveloped land which will be lost should this application be permitted. Therefore, development should seek opportunities to significantly enhance biodiversity wherever possible. In addition to the measures identified in the ecological survey report, we recommend that any development includes nesting opportunities for birds such as swifts, utilising integrated bird boxes, and roosting opportunities for bats, utilising integrated bat boxes.

#### Further Surveys

It is noted that this application is for outline planning consent. Should permission be granted it must be ensured that any future Reserved Matters Applications are supported by up to date ecological survey information.

#### Application Reference 0195/16

We also note that this application lies adjacent to the land proposed for development in Outline Planning Application reference 0195/16. It must be ensured that any ecological mitigation and enhancement measures are strategically planned across both sites, should both applications be consented.

Notwithstanding the comments set out above, should permission for this application be granted, we request that the recommendations made within the ecological survey report are implemented in full, via a condition of planning consent.

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

Yours sincerely

Jill Crighton  
Conservation Planner



**From:** Sue Hooton, Principal Consultant Ecologist [<mailto:Sue.Hooton@essex.gov.uk>]  
**Sent:** 16 March 2017 08:53  
**To:** Peter Harris <[Pete@train4ecology.co.uk](mailto:Pete@train4ecology.co.uk)>  
**Cc:** James Platt <[James.Platt@babberghmidsuffolk.gov.uk](mailto:James.Platt@babberghmidsuffolk.gov.uk)>  
**Subject:** RE: Land West of Thorney Green Road 5024/16 and 0195/16 -Skylark Mitigation

Hi Pete

Many thanks for your update on provision of skylark mitigation within the undeveloped space on site.

If this area is not negated by boundary landscaping requirements and appropriate management can be secured eg setaside with annual cultivations, under a LEMP, I would be satisfied with this mitigation embedded into the proposal to compensate for likely impacts on skylarks.

If overall this area can be actively managed in the long term and pressure to "tidy it up" can be rebuffed, maybe with an interpretation board on site, I am not sure if a specific nest plot within 1ha will be necessary but this feature could be trialled and monitored.

I have copied in James Platt, the case officer, and look forward to consultation of this skylark mitigation scheme – either as an application document or submission for discharge of condition on any consent.

If you need any more comments up front, please let me know.

Best wishes  
Sue

**Sue Hooton CEnv MCIEEM BSc (Hons)**  
Principal Ecological Consultant at Place Services

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