

## **WOOLPIT PARISH COUNCIL**

### **Planning Applications, Land North of Old Stowmarket Road, Woolpit.**

**4491/16. Change of use from agriculture to open space including a surface water management scheme and wildlife enhancement area.**

Woolpit Parish Council objects to this proposal for the following reasons:

1. Bearing in mind the proximity to Lady's Well, a Scheduled Monument, a full archaeological survey and assessment, rather than a desk-top, is necessary before any planning permission is granted.
2. A Landscape Appraisal needs to be undertaken to ensure appropriate treatment of the setting of the Scheduled Monument and the proposed Conservation Area.
3. A management plan for the proposed wildlife area should be provided.
4. There is no provision for cycle tracks across the open space either to access the village and Health Centre from the development or to access Lady's Well.
5. A direct cycle footpath/cycle track should be provided across the open space from near plot 12 to the Heath Road/Old Stowmarket Road crossroads. The crossroads is the nearest point to the village and the shortest distance to the crossroads is the route that residents will take from the houses to the village.
6. The developer should be required to contribute towards the planned cycle path from Woolpit to Elmswell which passes the site.
7. Parking should be provided near Lady's Well for users of the site. Not every visitor will be able to access the site by foot or cycle. Vehicle access is required for maintenance purposes and the existing access direct off Elmswell Road is dangerous.
8. A commitment to remove all the overhead electricity wires across the entire frontage of the Lady's Well site should be provided. It will not be satisfactory to terminate the overhead section of wires either within or in front of the Scheduled Monument site.

**4489/16. Application for Outline Planning Permission with all matters reserved, except for access, for the erection of up to 79 dwellings.**

Woolpit Parish Council objects to the proposal for the following reasons:

1. Bearing in mind the proximity to Lady's Well, a Scheduled Monument, a full archaeological survey and assessment, rather than a desk-top, is necessary before any planning permission is granted.
2. Para 4.13 of the applicant's Transport Statement says that each property shall have two cycle storage spaces per dwelling. However, no provision has been made for cyclists within and outside of the site.
3. It is unacceptable to assume that that the crossroad junction and other improvements proposed for the Old Stowmarket Road South development (1636/16) have been completed before development work for this current application takes place. This application should contain its own proposals for road, footpath and cycle track improvements.

4. Provision should be made for a revised junction at the crossroads suitable for the combined Old Stowmarket Road North and South developments possibly using land which is part this application.
5. Traffic data appears to be flawed as does not include the addition traffic using the new car park at the rear of the Health Centre generated by vehicles for the school and Health Centre itself.
6. A commitment to carry out external road improvements before site work commences should be provided.
7. The application should not be considered in isolation but as one of several at the application or pre-application stage which together could add some 700 homes to the existing 900 in Woolpit.
8. The noise survey is flawed. Only continuous noise levels have been measured with no record of the levels resulting from 'single sound' events. Goldstar Transport, the operator of the adjacent lorry park and container storage depot has a record of problems resulting from 'single sound' events, particularly at night, when containers are being moved. Further measurement and a more comprehensive report is necessary. Reference must be made and consideration given to the numerous complaints that have been made by residents to MSDC Environmental Health over several years up to the present time about noise emanating from Goldstar Transport.
9. There has been no public exhibition or community engagement for either application. This is particularly disappointing considering the importance of the site at the entrance to the village and its proximity to a Scheduled Monument. The public's views should be sought before the applications are considered.
10. There is significant light pollution emanating from the Goldstar Transport site. A report on the effect of this on the proposed development should be provided before the application is determined.
11. The application should include a minimum of 35% affordable homes.
12. All brownfield sites within the district should be utilised for development before any further agricultural land is taken for development.
13. The applicant in reports refers to Woolpit being a small town with large scale industrial sites in Old Stowmarket Road. This is absolutely not the case. Woolpit is a medium sized medieval village with great character and with many significant Listed Buildings. Old Stowmarket Road, particularly in the area of the application near Lady's Well, is still semi-rural in nature and not dominated by industry.

**From:** RM PROW Planning  
**Sent:** 29 November 2016 16:06  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 4489/16

**Our Ref:** W574/001/ROW814/16

**For The Attention of:** John Pateman-Gee

**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.

Please accept this email as confirmation that we have no comments or observations to make in respect of this application directly affecting Public Footpath 1.

Please note, there may also be public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

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**

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**From:** Nathan Pittam  
**Sent:** 17 November 2016 10:29  
**To:** Planning Admin  
**Subject:** 4489/16/OUT. EH - Land Contamination.

**M3 : 186593**  
**4489/16/OUT. EH - Land Contamination.**  
**Land north of, Old Stowmarket Road, Woolpit, BURY ST EDMUNDS, Suffolk.**  
**Application for Outline Planning Permission with all matters reserved, except for Access, for the erection of up to 79 dwellings**

Many thanks for your request for comments in relation to the above application. I have reviewed the application documents and can confirm that I believe that the risks from contamination at the site are sufficiently low that we cannot require any additional works as part of the planning permission that may be granted for the site. We therefore have no objection to the proposed development. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD  
Senior Environmental Management Officer  
Babergh and Mid Suffolk District Councils – Working Together  
t: 01449 724715 or 01473 826637  
w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** Philippa Stroud  
**Sent:** 03 January 2017 10:43  
**To:** Planning Admin  
**Cc:** John Pateman-Gee  
**Subject:** 4489/16/OUT Land north of Old Stowmarket Road, Woolpit - Other Issues

WK/186591

Dear John

**Ref: 4489/16/OUT EH – Other Issues**  
**Location: Land north of Old Stowmarket Road, Woolpit IP30 9QS**  
**Proposal: Application for Outline Planning Permission with all matters reserved, except for Access, for the erection of up to 79 dwellings.**

Thank you for the opportunity to comment on the above planning application.

I wish to object to the proposed development. I consider it to be too close to the noisy activities associated with the container haulage site, currently occupied by Goldstar Transport Ltd, which is immediately north of the application site and operates 24 hrs a day. The Design and Access Statement itself acknowledges, at 2.7, that *"The Gold Star transport depot includes large industrial buildings and also very high-stacked coloured containers across the entire north of the site and extending well beyond."*

Whilst the Noise Survey and Assessment Report, dated 13 June 2016, states *"The site is primarily affected by traffic noise from Heath Road to the west, and container lorry movements to the north"* there does not appear to be an understanding of the noise arising from the movement and positioning of the steel containers on site when, for example, they are being stacked on top of each other. Furthermore, the noise monitoring has been measured over a four weekday period only, unattended in two of the three positions, which provides no indication of weekend conditions when the occupiers of the proposed dwellings are likely to wish to have quiet enjoyment of their gardens etc.

This Council has a long record of noise complaints regarding the operations on the land north of the application site, from residents of properties further afield than those proposed in this application. In the absence of a more robust noise report, which fully addresses the noise from machinery including equipment used for stacking containers, and the unpredictable nature of the loud short-lived steel container impact noises, especially at night, from the container depot, I am of the opinion that the existing use of the land to the north of the application site will result in significant adverse impacts on health and quality of life of the occupiers of the proposed dwellings.

I would also strongly advise you to ensure that the proposed development does not fetter the existing surrounding uses, including the garden nursery on the eastern boundary, to trade/operate as they currently do.

Given the close proximity of the neighbouring uses we would have serious concerns regarding the viability of the proposal and recommend refusal.

Regards.

Philippa Stroud  
Senior Environmental Protection Officer  
**Babergh and Mid Suffolk District Councils - Working Together**

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Resource Management  
Bury Resource Centre  
Hollow Road  
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IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Ipswich IP6 8DL

Enquiries to: Rachael Abraham  
Direct Line: 01284 741232  
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Web: <http://www.suffolk.gov.uk>

Our Ref: 2016\_4489  
Date: 29 November 2016

For the Attention of John Pateman-Gee

Dear Mr Isbell

**Planning Application 4489/16– Land north of Old Stowmarket Road, Woolpit:  
Archaeology**

The large proposal affects an area of very high potential recorded in the County Historic Environment Record. It is immediately adjacent to the Scheduled Medieval Lady's Well moated site and possible holy well (WPT 002). The medieval church of St Edmunds is located less than 200m to the west of the proposed development area and a number of finds of prehistoric, Roman, medieval and post-medieval date have also been located within the vicinity (WPT 007, 017, 044 and 045). Recent archaeological investigations immediately opposite to the proposal area have also recorded remains of prehistoric date (WPT 054). As a result of this potential, the large scale of the proposal and the fact that the site has not previously been the subject of systematic below ground archaeological investigation, there is a high probability of encountering archaeological remains at this location. The proposed scheme will involve groundworks which will damage or destroy any surviving archaeology.

Given the high potential and lack of previous investigation, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation prior to the determination of this planning application, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework as is consistent with the advice provided to the applicant during pre-application consultations.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should there be any below-ground archaeological finds of significance, will be based upon the results of the evaluation.

In this case, a trial trenched archaeological evaluation will be required to establish the potential of the site. The results of the evaluation must be presented with any application submitted for the site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important archaeological remains within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation. Please see our website for further information on procedures and costs: <http://www.suffolk.gov.uk/archaeology>

Historic England should also be consulted at the earliest opportunity regarding the potential setting impacts of this proposal upon the adjacent Scheduled Ancient Monument.

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





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

AW Reference:	00018695
Local Planning Authority:	Mid Suffolk District
Site:	Land North of Old Stowmarket Road, Woolpit
Proposal:	Creation of 79 x C3 Dwellings
Planning Application:	4489/16

**Prepared by: Mark Rhodes**

**Date: 22 December 2016**

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

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## **ASSETS**

### **Section 1 – Assets Affected**

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

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

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

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

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

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

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

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### **Section 5 – Trade Effluent**

- 5.1 Not applicable
-

**From:** Consultations (NE) [mailto:consultations@naturalengland.org.uk]  
**Sent:** 15 November 2016 13:52  
**To:** Planning Admin  
**Subject:** 4489/16 - Consultation Response

Application ref: 4489/16  
Our ref: 201377

Dear Sir/Madam,

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

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

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

Yours faithfully,

Jamie Clarkson  
Consultations  
Natural England  
Hornbeam House, Electra Way  
Crewe Business Park  
Crewe, Cheshire CW1 6GJ

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05/12/2016

Dear John,

**RE: 4489/16 Application for Outline Planning Permission with all matters reserved, except for Access, for the erection of up to 79 dwellings. Land north of Old Stowmarket Road, Woolpit**

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

We have read the ecological survey report (T4 Ecology Ltd, April 2016), bat report (Robson Ecology, September 2016) and Great Crested Newt eDNA survey report (T4 Ecology Ltd, August 2016) and we are satisfied with the findings of the consultants.

We note that the proposed site plan does not show the retention of the hedgerow/tree line along the western boundary. The Preliminary Ecological Appraisal (T4 Ecology Ltd, April 2016) recommends the retention of all existing boundaries. The consultant has also recommended a search for nesting birds prior to any works, if carried out during nesting season. This should be carried out no longer than 3 days prior to commencement of works by a suitably experienced individual. Should any active nests be identified they need to be fenced off with a suitable buffer, and protected until the end of the nesting season or until the young have fledged.

We also request that the recommendations made within the reports are implemented in full, via a condition of planning consent, should permission be granted.

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

Yours sincerely

Jill Crighton  
Conservation Planner

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Registered charity no 262777

**From:** David Pizzey  
**Sent:** 17 November 2016 12:07  
**To:** John Pateman-Gee  
**Cc:** Planning Admin  
**Subject:** 4489/16 Land north of Old Stowmarket Road, Woolpit.

John

I have no objection to this proposal as the site involved does not contain any trees. However, trees are situated along some of the site boundaries and these will be important to help soften and integrate any development within the local landscape. The site layout plan indicates they should not be adversely affected by the proposal although ground protection and protective fencing might be necessary in some areas.

Regards

David

**David Pizzey**  
Arboricultural Officer  
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Babergh and Mid Suffolk District Councils - Working Together



## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	4489/16	
<b>2</b>	<b>Date of Response</b>	5.1.2017	
<b>3</b>	<b>Responding Officer</b>	Name:	Jonathan Duck
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
<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.	The Heritage Team does not support the scheme as it would not accord with the requirements of the LBA, the principles of the NPPF, or the Local Plan.	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>This application seeks outline consent for the erection of up to 79 dwellings on land to the north of Old Stowmarket Road, and east of Heath Road, in Woolpit.</p> <p>The heritage team issues of concern include the impact of the scheme on the Lady's Well SAM to the north west of the site, the Grade I listed church to the west of the site, and the undesignated Saffron House, located to the south of the site, on the southern side of Old Stowmarket Road, close to the proposed access road.</p> <p>HE have provided a detailed response to the outline application, which in recommendation states that the application be withdrawn and additional information be submitted, on the basis that the density currently proposed would impact harmfully on the setting of the assets. HE also requested increasing the open space provision around the SAM.</p> <p>The Heritage Team view concurs with that of HE in regard to the requirement to increase the open space around the east of the monument, to ensure a semblance of the former setting is preserved, which would help maintain historical and aesthetic conservation values. However, the Heritage Team disagrees with the HE assertion that the development site 'is still recognisable as the outer edge of the village'. It is a development of up to 79 houses of a linear, suburban form and disposition, as seen against the western edge of the site, and on the eastern edge of the village. It does <i>not</i> appear as the</p>	

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

		<p>edge of the village.</p> <p>The Heritage Team also does not agree with the applicant's Heritage Statement, which considers one of the benefits of the development the creation of 'an open space, [and] a wildflower meadow or green, to the south of the monument'. This is non-sensical. The SAM is currently tucked into the north western corner of a large field, with the remainder of the arable land to both east and south currently open. By impinging upon this land significantly to the east – and by landscaping it to the south – does not – and cannot - constitute the positive creation of an 'open space', particularly as HE observed that the setting of the SAM was important and that it had originally been sited in relative isolation, at the edge of the village in a rural, agricultural landscape.</p> <p>The Heritage Statement also suggests another benefit of the scheme would be in the creation of new views towards the church spire. However there are currently myriad views from the field which is to be engulfed by this development. By building over much of it, and thereby limiting views of the spire from the site, it appears the agent is suggesting those remaining views would in some way 'showcase' the spire. This is similarly non-sensical and arguably diminishes the value of the Heritage Statement.</p> <p>The Heritage Team view is that the development would adversely affect the significance of the church, and the SAM. In terms of the LBA the development would neither preserve nor enhance the setting of the listed buildings, (s.66) nor the character and appearance of the adjacent CA, (s.72). In terms of the NPPF, the development would be less than substantially harmful but, as HE suggest, the level of harm to the Grade I church and the CA would be 'low to moderate', whereas the harm to the SAM would be 'moderate to high'. (The effect on the undesignated Saffron House to the south is low to moderate).</p> <p>It is for these reasons the Heritage Team does not support the proposal.</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</p>	<p>Substantial reconsideration of the density and layout of the scheme is required.</p>

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	changes? Please ensure any requests are proportionate	
7	<b>Recommended conditions</b>	

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Historic England

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Mr John Pateman-Gee  
Mid Suffolk District Council  
Planning Control Dept  
Council Offices  
Needham Market  
Ipswich, IP6 8DL

Direct Dial: 01223 582751

Our ref: P00537565

04 December 2016

Dear Mr Pateman-Gee

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP  
(Development Management Procedure) (England) Order 2015  
LAND NORTH OF OLD STOWMARKET ROAD, WOOLPIT, SUFFOLK, IP30 9QS  
Application Nos 4491/16 & 4489/16**

Thank you for your letters of 10 November and 2016 notifying Historic England of the above applications

**Summary**

The applications comprise the Outline permission for the development up to 79 dwellings (with all matters reserved except for access) and the Change of Use of part of the application site from agricultural to open space. The Change of use includes a surface water management scheme and wildlife enhancement. Our advice below is for both planning applications.

Historic England provided pre-application advice on the scheme to Sheppard Architects LLP on the 25<sup>th</sup> May and 16<sup>th</sup> June 2016 (Our ref: PA00428164). Our advice below reflects our earlier comments.

The proposed development would impact upon the setting of the scheduled monument known as 'Lady's Well (holy well and moat)', the grade I listed church of St Mary and Woolpit Conservation Area. It is our view that this impact would result in harm to the significance of these designated heritage assets; however design scheme changes could be incorporated in order to reduce the level of that harm and provide additional public benefits. We also require further information in order to fully assess the application for the Change of Use. We would recommend the applications are withdrawn, or decisions deferred, to allow the additional information to be provided and design changes to be considered.

**Historic England Advice**

The Lady's Well scheduled monument comprises an irregular, partially water-filled, moat surrounding a moderate sized moat island. The site is unoccupied and the current land-use is given over to scrub vegetation and trees. A spring is located at the base of the southern arm where a brick chamber has been constructed around the



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HistoricEngland.org.uk



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



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spring head and is thought to be the site of the 'holy well'. The scheduled monument is also associated with the possible site of a medieval chapel, thought to be on or close to the moated site; although recent works looking at the history of the site (detailed in the application documents) suggests this interpretation may need to be reviewed. The scheduled monument contains good evidential information for its historic nature and extent, including the earthworks of the moat and a good potential for buried archaeology within the island and palaeoenvironmental deposits within the moat. The spring and spring head provide added physical interest. Together with the local historical interest, the monument's significance is also enhanced by strong communal values linked to the holy well, the (possible) chapel and local folklore.

The setting of the scheduled monument is an important aspect of how the site is understood and positive elements of this setting contribute to the monument's significance. This includes its visual context, its association with other assets (such as the nearby grade I listed church) and its relationship with the wider historic landscape. The immediate surroundings of the monument are particularly important. The moat has historically been situated in a relatively isolated location away from the main focus of settlement, surrounded by a largely undeveloped, rural and agricultural landscape. This landscape has been eroded in the latter part of the 20<sup>th</sup> century and the undeveloped and 'isolated' elements of the monument's setting are now only preserved in the open fields to the south and east - e.g. the application site and, to a lesser degree, the land beyond this south of Old Stowmarket Road. These areas reflect the character of the monument's contemporary surroundings and allows it to be experienced in something close to its original context. They are positive elements of its setting. The land south of Old Stowmarket Road has recently received planning approval for the construction of up to 120 dwellings and this, together with the existing development surrounding the monument, makes the area of the application site one of the last remnants of the 'historic' landscape. This increases its importance as part of the setting of the monument (and the church and conservation area) and its contribution to significance.

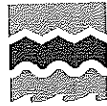
The application site provides historic context and forms an important element within the setting of the grade I listed church of St Mary. It is situated on a historical route into the village; with important views of the church tower and spire. The steeped church is the dominant built feature within the landscape on this eastern side of the village, and is visible in long views from a number of locations when approaching to and passing the settlement, including rising above the trees in views from the application site. The spire enhances the church's dominance and highlights how it was designed to be experienced as a landmark within the wider landscape setting. The application site also contributes to the character of the conservation area. The density of buildings decreases on the eastern side of the settlement and although some scattered development (such as the nursery) lies further east of it, the proposed development site is still recognisable as the outer edge of the village where it joins open countryside. It is important in establishing the character of conservation area at this



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historic interface with surrounding countryside. In addition to our advice below, consultation should also be undertaken with the Local Planning Authority's Conservation Officer on the impact upon these two heritage assets.

The current applications are supported by Planning, Design and Access and Heritage Statements. These are supplemented by an Archaeological Desk-Based Assessment and geophysical survey report. The Heritage Statement has provided a detailed assessment of the significance of the designated heritage assets affected by the proposed development, including a good consideration setting and the contribution it makes to the significance of these assets. This has taken on board the comments made by Historic England at the pre-application stage in regards to the setting of the scheduled monument, the character of the conservation area and the views of the church spire.

Although we welcome much of what the Heritage Statement presents; we disagree with some of the overall conclusions. We would place a greater emphasis on the importance of the undeveloped character of the scheduled monument's setting (e.g. the application site) in terms of understanding and experiencing the monument's historic context, and that of the church and conservation area. We note the Statement's comments regarding the visibility and the tree cover over the moated site; however we do not agree this alters how it is experienced within the landscape to the degree suggested in the Heritage Statement. It should also be noted that the screening from tree cover would reduce seasonally and it is not permanent or the optimal land-use - a reduction in tree and vegetation cover would improve the condition of the monument and would be strongly encouraged by Historic England as part of any future management works. The current application proposes up to 79 dwellings and there is little consideration in the applications of the impact from a development with such a high density on application site of this size, and in close proximity to the scheduled monument. We also consider there to be a higher cumulative impact than suggested in the Statement, particularly with the approved c. 120 houses on the site south of Old Stowmarket Road.

We recognise that the applicant has taken steps to reduce and minimise the impact of the development and substantial changes have been incorporated since the original designs were submitted at the pre-application stage. We welcome the amendments which have changed the western half of the site from housing to open space, removing development from within the conservation area and restoring the line of the historic field boundary. We also welcome the changes which have pulled the building line back in the south of the application site, creating an open space along the 'front' of the development. This has reduced the intrusion of the development upon the historic route into the village and conservation area, and removes and reduces the intrusion of the housing and infrastructure into the important views towards the spire of the grade I listed church. Around the scheduled monument, areas of 'open space' would be retained to the south and, to a lesser degree, on the east. We welcome the proposals



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to re-orientate the housing along the western edge of the development so that properties face out on to this open area and the scheduled monument, creating a sense of ownership and increasing awareness of the site and its significance. Similarly we have no objection to improving public access to the scheduled monument which could enhance the understanding and communal value of the site. We also support the burying of the overhead power-lines, removing these from the monument's setting, and improvements to the eastern and northern boundaries of the application site which would further screen and soften the existing development in this area.

The application notes some of the other concerns raised in our pre-application consultation; however does not fully assess the impact or potential level of harm from these - for example the impact upon setting from noise and lighting. In addition to this we highlighted that there could be potential hydrological impacts from placing large ponds in close proximity to the water-filled moat; however we can see no consideration of this in the application documents. This is particularly pertinent given the application for Change of Use includes permission for the surface water management scheme and places several ponds due south of the scheduled monument. We also note that there are some tentative proposals for a car park within the open space to the south and possibly adjacent to the scheduled monument to allow better access. Whilst we do not object to the principle of improving the access here; further assessment and consultation would be required to understand what this would comprise of and what the potential impact would be. The character of the open space, which the Application states is designed to preserve the setting of the heritage assets, could be greatly changed by the introduction of an unsympathetic car park which, for example, included areas of hard standing or required tall street lighting.

In terms of the housing, we welcome the approach to avoid a 'suburban' character and create a distinctive sense of place with design, style and materials which draw upon the local vernacular forms. We do however have strong concerns with the density proposed of up to 79 dwellings. This would substantially increase the impact of the development upon the setting of the designated heritage, in particular the scheduled monument. The last pre-application proposals we received showed a density closer to c. 45 dwellings which, if the application were approved, would be far less intrusive. A lower density would also allow far greater flexibility in the design and layout of the development. For example, whilst we welcome the orientation of the properties facing out onto the open space and scheduled monument, the impact could be further reduced by relocating the access and parking to the rear of the properties. Similarly, a lower density would allow more space to create a larger open buffer to the east of the scheduled monument, helping to preserve the monument's setting.

The application site forms an important element of the settings of the scheduled monument, conservation area and grade I listed church, providing historic context and enhancing our understating of the significance of these assets. The proposed development would introduce up to 79 residential properties (and associated



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infrastructure, access and landscaping) into these settings. The built elements of the development would block or intrude into views towards all three assets and would erode the important open, undeveloped and agricultural character and historic context. It is our view that this would adversely impact upon the setting of designated heritage assets and result in harm to their significance. In the terminology of the National Planning Policy Framework (NPPF) the level of this harm would be 'less than substantial'. Within that 'less than substantial' scale we would consider the level of harm to the grade I listed church and conservation area to be 'low to moderate', but a 'moderate to high' level of harm to the scheduled monument. The potential indirect physical impact upon the scheduled monument from changes in the hydrology, or any impact upon its setting from additional development within the open space to the south, cannot be assessed without further information.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting, local planning authorities shall have special regard to the desirability of preserving the building or its setting (Paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (Paragraph 72). The NPPF builds upon the 1990 Act. It identifies the conservation of heritage assets as a core principle of the planning system (Paragraph 17). The significance of heritage assets can be harmed or lost by development in their setting and, in line with NPPF paragraphs 132 and 134, *any* harm to the significance of designated heritage assets requires clear and convincing justification and must be weighed against the public benefits of the scheme. It is important that proposals seek to minimise the conflict between a heritage asset's conservation and the proposal, in line with Paragraph 129 of the NPPF. Proposals should also seek opportunities for the development to enhance or better reveal the significance of the designated heritage, in line with NPPF Paragraph 137.

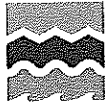
It is our view that amendments could be incorporated into the proposed development in order to reduce the level of impact and harm. Key to this would be a reduction in the density of the housing, changes to layout and increasing the open space around the scheduled monument. We acknowledge that the application has sought to minimise conflict, incorporate public benefits and enhance significance. However it is our view that there is still scope to consider further beneficial elements such as new interpretation and works (secured through management agreements or legal arrangements such as Section 106) to improve the physical condition of the scheduled monument. Further information is also required for some aspects of the two applications, in particular the water management systems and possible car park on the open space in the west of the site and the impact of these proposals upon the scheduled monument.



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Although we appreciate that the current application for the main development is Outline, we would consider it important that the issues discussed above are resolved before this application, or that for the Change of Use, is determined. It is important that the Council has sufficient information as to fully assess the impact of the proposed works, to make a reasoned judgment as to the level of harm and be able to weigh that harm against the public benefits of the scheme.

In addition to the impact upon the setting of the designated heritage assets, the proposed development would require substantial groundworks which could impact below ground archaeology (non-designate heritage) within the application site. We note the comments from Suffolk County Council Archaeological Service on this matter and we support their recommendation for pre-determination evaluation works of this area.

**Recommendation**

We would recommend the outline application and application for Change of Use are both withdrawn, or decisions deferred, to allow additional information to be provided and changes to the proposed development to be considered.

Should, notwithstanding our advice, the Council proposes to determine the applications in their current form, you should be satisfied that you have sufficient information to fully assess the impact of the works. Clear and convincing justification is required for the harm to the significance of the designated heritage assets, and the Council should be satisfied that that harm is clearly outweighed by public benefits which could not be realised through a less harmful scheme. Should the application be approved, we would recommend Conditions are attached to ensure control over the design and layout of the proposed development and to secure the proposed benefits to the designated heritage assets, in line with consultation with Historic England.

We would welcome the opportunity of advising further should additional information or amendments be submitted. If the Council approves the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

**Nick Carter**

Assistant Inspector of Ancient Monuments  
E-mail: [nick.carter@HistoricEngland.org.uk](mailto:nick.carter@HistoricEngland.org.uk)

cc. Rachael Abraham, Senior Archaeological Officer, Suffolk County Council Archaeological Service



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

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

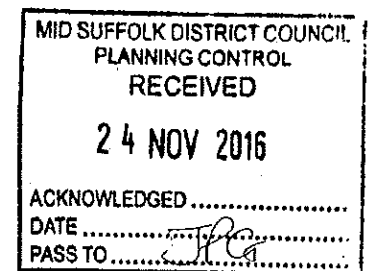
Your Ref:  
Our Ref: FS/F310958  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 21/11/2016

Dear Sirs

**Land north of Old Stowmarket Road, Woolpit IP30 9QS**  
**Planning Application No: 4489/16**

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.

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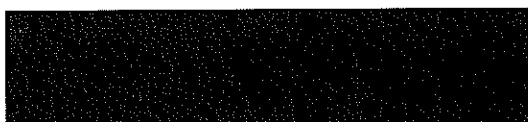
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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information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

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



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4489/16



**Suffolk Fire and Rescue Service**

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
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131 High Street  
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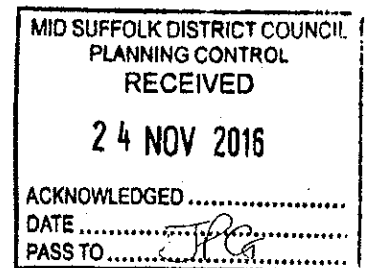
Your Ref:  
Our Ref: FS/F310958  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: http://www.suffolk.gov.uk

Date: 21/11/2016

Dear Sirs

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**Planning Application No: 4489/16**

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

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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.

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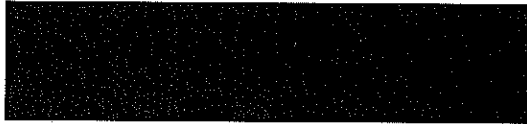
OFFICIAL

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Yours faithfully



Mrs A Kempen  
Water Officer

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

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: 16/4489  
Our Ref: NHSE/MIDS/16/4489/KH

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

24 November 2016

Dear Sirs,

**Application for Outline Planning Permission with all matters reserved, except for  
Access, for the erection of up to 79 dwellings.  
Land North of Old Stowmarket Road, Woolpit IP30 9QS**

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 West Suffolk Clinical Commissioning Group (CCG).

**Background**

2. The proposal comprises a development of up to 79 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 is 1 GP practice within a 2km catchment (or closest to) the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. 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 service 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>
Woolpit Health Centre	14,134	645.87	9,419	-323.32
<b>Total</b>	<b>14,134</b>	<b>645.87</b>	<b>9,419</b>	<b>-323.32</b>

**Notes:**

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

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

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Telephone Number – 0113 824 9111

Your Ref: 16/4386

Our Ref: NHSE/MIDS/16/4386/KH

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

07 December 2016

Dear Sirs,

**Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space**  
**Land on the west side of Barton Road, Thurston, IP31 3NT.**

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 West Suffolk Clinical Commissioning Group (CCG).

**Background**

2. The proposal comprises a development of 138 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 is 1 GP practice within a 2km catchment (or closest to) the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. 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 service directly impacted by the proposed development and the current capacity position is shown in Table 1.

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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>
Mount Farm Surgery	12,244	768.40	11,206	-71.19
<b>Total</b>	<b>12,244</b>	<b>768.40</b>	<b>11,206</b>	<b>-71.19</b>

**Notes:**

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



Your ref: 4489/16  
Our ref: Woolpit – Land north of Old  
Stowmarket Road 00044369  
Date: 22 February 2017  
Enquiries to: Peter Freer  
Tel: 01473 264801  
Email: [peter.freer@suffolk.gov.uk](mailto:peter.freer@suffolk.gov.uk)

Mr John Pateman-Gee,  
Planning Department,  
Mid Suffolk District Council,  
Council Offices,  
131 High Street,  
Needham Market,  
Ipswich,  
IP6 8DL

Dear John,

**Woolpit: Land north of Old Stowmarket Road – developer contributions**

I refer to the outline planning application (with all matters reserved, except for access), for the erection of up to 79 dwellings. This letter follows my extension of time request sent on 02 December 2016 to consider further the education approach.

Due to the significant levels of developer led growth in Woolpit, the District Council asked the County Council to consider options for expanding the current primary school on a temporary or permanent basis. As the District Council are aware, the existing primary school sits on a constrained site with significant highway issues arising at the start and end of the school day together with its close proximity to the Health Centre. Indeed, the District Council recognise the highway issues arising from the Health Centre because they have sought to secure land from a planning application to expand the car park. Unfortunately, it has taken slightly longer than anticipated to produce a feasibility study to understand if the school can temporarily expand, but as recognised by the District, this is an important piece of evidence. This feasibility study was received on Monday 20 February 2017.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £17,064 towards libraries provision.

This consultation response mainly deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Woolpit. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should be secured by way of a Section

106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning applications and emerging development proposals which, when including the 79 dwellings from this proposed development, amount to in excess of 800 dwellings.

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

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, which is set out 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 21 January 2016 and started charging CIL on planning permissions granted from 11 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 06 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 S106A contributions as they fall outside of the adopted 123 list.

The details of specific S106A contribution requirements related to the proposed scheme are set out below:

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

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

School	Capacity				Actual/Forecast Pupil Numbers					
	Permanent	95%	Temporary	Total	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Woolpit Primary Academy	210	200	0	200	171	181	183	173	176	175
Thurston Community College	1940	1,843	0	1,843	1,859	1,828	1,849	1,862	1,872	1,868

School level	Minimum pupil yield:	Required:
Primary school age range, 5-11:	20	20
High school age range, 11-16:	14	0
Sixth school age range, 16+:	3	0

The local catchment schools are Woolpit Primary Academy, Ixworth Free School and Thurston Community College.

### Primary School

Pupil forecasts for Woolpit Primary Academy are showing a steady decline over the next 5 years; by 2020 the numbers are forecast to fall to 175 while the school's 95% capacity is 200. Hence there will be 25 spare places at the school, i.e. sufficient places for pupils generated from 100 new houses. These surplus places have already been used up by the resolve to grant planning permission (1636/16). The existing Primary School cannot be permanently expanded within its current site, and due to access issues it is unlikely that it could be expanded if additional land was acquired to the north of the school site.

Therefore SCC forecasts show that there will be no surplus places available at the catchment primary school to accommodate any of the pupils anticipated to arise from this proposed development.

For a number of compelling reasons including improving education attainment, community cohesion and sustainability the highly preferred outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Woolpit. Where pupil bulges are anticipated the County Council will consider the provision of temporary classrooms but such an approach is only viewed as an interim measure if the longer term pupil forecasts indicate the need for permanent provision (by way of school expansion or a new school). Only as a last resort will the County Council consider offering places to pupils at out of catchment schools but this is seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of significant dis-benefits including negative impacts

on education attainment, community cohesion, sustainability and costs. It is for the District Council to weigh up these important matters in considering the planning balance when deciding whether to allow or refuse planning permission.

Regarding out of catchment schools, major studies have shown that each transfer can result in a 6 month dip in standards as a minimum. 40% will eventually recover but 12% of pupils suffer long term negative effects. 2-tier pupils always out-performed 3-tier pupils at GCSE in the past and whilst the additional transfer isn't the only reason it does have a negative effect.

The Policy Development Panel for School Organisation Review recommended at the start that any proposal should:

- 1) Ensure a single line of accountability for each key stage and
- 2) Minimise the number of points of transfer from one school to another within the statutory age range

This was the reason why the final decision was made to close the middle schools.

In addition to the above a lot of work is involved in transferring a pupil cohort from one school to another. There's the preparation and handover of pupil records to ensure the new school is made aware of each child's history, progress, health, needs and other agencies' involvement etc... to ensure continuity of their learning. There's also the pastoral care of all children so they feel comfortable with the change. Vulnerable and looked after children and those with SEN and behaviour difficulties and their parents have to be supported particularly sensitively and this could involve anything from regular visits to the school to staff working across the two schools for a period of time.

Due to the current uncertainty over the scale, location and distribution of housing growth in the Woolpit locality it is not clear at this point in time whether the most sustainable approach for primary school provision is to:

- a. Retain a single primary school for the village by relocating and delivering a new larger school; or,
- b. Retain the current primary school and deliver a second (new) primary school for the village.
- c. Whichever strategy is the most appropriate a site of a minimum size of 2.2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
- d. In the short term the feasibility study demonstrates that it is possible to site within the school area a temporary double mobile classroom for 60 pupils.

However this is strictly on the understanding that such mitigation is only of a limited and temporary nature ahead of determining either a. or b. above. Discussions with the Head Teacher and Governors are still required to see if this is something they would be prepared to accept.

- e. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 20 primary age pupils forecast to arise from the proposed development is calculated as follows

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 79 dwellings it is forecast that 20 primary age pupils will arise
- Therefore 20 pupils x £16,429 per place = **£328,580 (2016/17 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £543,620 for a 2.2 hectare site and equates to £1,294 per pupil place. For the proposed development, this equates to a proportionate land contribution of 20 places x £1,294 per place = **£25,880.**

At present no land has been identified for education use within Woolpit, but SCC will work closely with Mid Suffolk DC to identify a site of 2.2 ha. Even though there is currently no identified new school site in terms of the CIL regulations, the 'project' required to support significant levels of developer led growth is the need for a new primary school. It is therefore suggested that consideration be given to imposing an appropriate planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition can be discharged once construction of the new primary school has commenced. This recognises the importance that the Government attaches to education provision as set out in paragraphs 38 and 72 of the NPPF.

#### **Temporary classroom costs**

The physical constraints of the existing primary school site mean that a permanent expansion of the school is not possible. Therefore temporary arrangements will need to be put in place to accommodate the additional pupils arising from new homes.

The DfE publishes Area Guidelines (Building Bulletin 103) for schools which define the minimum areas of school buildings, playing fields, site etc. Woolpit Primary Academy is on a very small and challenging site with no possibility of expanding its boundary unless further land was acquired. It has a capacity of 210 places (1 form of entry) so according to the guidelines its minimum site area (including playing fields) should be 11,220 sq m. It has a site area of 11,973 sqm which excludes an early years setting. It is therefore at the optimum site area for a school of this capacity. Because of the unconventional layout of the site, it is very unlikely that permanent accommodation can be added to the school and no money will be spent on any permanent accommodation. However schools can take on extra pupils arising as a "bulge" by providing temporary classrooms. This might happen if there is a sudden spike in the local population, or as in this case, due to new housing developments providing it is only temporary until permanent places are provided elsewhere like a new school.

The Primary School does have its own grass playing field. Installing a double mobile (providing 60 places) may mean it is located on an area of hard play or playing field which would reduce the area of playing field available to the increased number of pupils. So in absolute and relative terms the area of playing field would reduce i.e. more pupils at the school sharing less outdoor play area. It is therefore preferable to locate a temporary classroom on non-playing field land within the school site but this is not possible in this situation.

A Feasibility Study has been commissioned to assess whether the existing school site has space to accommodate this temporary expansion and it has confirmed it is possible. However this would result in some loss of school playing field and the difficulties that would arise in gaining Section 77 consent from the Secretary of State for a change of use from playing field to a temporary building.

While it is physically possible to set up a temporary building on the site, for many other reasons (loss of playing field, distance from main teaching block, planning restrictions, visual impact etc.) and not to mention whether the Academy Trust would grant permission, it would be reasonable to conclude that installing a double mobile on this site would be very difficult.

As an Academy the County Council has limited control over their decision whether or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction

commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. At this stage SCC doesn't know how many additional houses the District Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, as well as an additional 25 pupils accommodated in the spare places in the school arising from the application which has a resolution to grant permission 1636/16, i.e. a combined total of approximately 360 dwellings. The District Council will need to consider whether a planning condition to restrict occupation until permanent primary education provision is available locally that is an acceptable solution to support further development once the temporary provision places are used up by additional development.

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place =  $\text{£}250,000/60 = \text{£}4,167$
- Primary age pupils arising from this site is 20
- Proportionate contribution towards temporary classroom is 20 pupils x  $\text{£}4,167$  per place =  $\text{£}83,340$

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

### **Secondary Schools**

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. At present there is forecast to be sufficient surplus places available for pupils forecast to arise from the proposed development, with any expansion projects currently falling under CIL.

However against the anticipated level of housing growth across the wider area a full assessment of secondary school requirements is in the process of being analysed, but the initial view is that in due course a new secondary school will be needed. The best estimate of current cost is in the region of £25m, with a site



of 10 hectares.

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

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

This development is the Woolpit ward where the only provider is Woolpit Arc. From September 2017 there is a predicted deficit of 24 places. This proposed scheme would result in approximately 8 pre-school children arising. Based on the expected scale of development in Woolpit, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m<sup>2</sup> (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 8 children of the total 60 who would be accommodated within the new setting, could be calculated as follows (revised costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place
- From 79 dwellings there is the need for 8 additional places
- Therefore 8 pupils x £8,333 per place = **£66,664 (2016/17 costs)**

- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all

local children and young people, including disabled children, and children from minority groups in the community.

- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

- 4. Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

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

- 5. Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.
- 6. 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:

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

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

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

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

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

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

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

- 9. 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.

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

I consider that the contributions requested are justified and satisfy the requirements of

the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

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

cc Neil McManus, SCC  
Iain Maxwell, SCC  
Chairman – Woolpit Parish Council  
Christine Thurlow, MSDC  
Steve Merry, SCC

Your ref: 4489/16  
Our ref: Woolpit – Land north of Old  
Stowmarket Road 00044369  
Date: 07 March 2017  
Enquiries to: Peter Freer  
Tel: 01473 264801  
Email: [peter.freer@suffolk.gov.uk](mailto:peter.freer@suffolk.gov.uk)

Mr John Pateman-Gee,  
Planning Department,  
Mid Suffolk District Council,  
Council Offices,  
131 High Street,  
Needham Market,  
Ipswich,  
IP6 8DL

Dear John,

**Woolpit: Land north of Old Stowmarket Road – developer contributions**

I refer to the outline planning application (with all matters reserved, except for access), for the erection of up to 79 dwellings.

The County Council responded by way of letter dated 22 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

1. Temporary classroom. Whilst these mitigation requirements may still arise in this respect, the District Council's published 123 List contains 'provision of primary school places at existing schools'. So whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.
2. Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school. This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.

Regarding the credit of surplus primary school places this is an issue for the District to decide, but the 25 surplus places cannot be gifted twice and currently the resolved to grant permission 1636/16 uses these places.

Yours sincerely,

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

cc Neil McManus, SCC  
Iain Maxwell, SCC  
Chairman – Woolpit Parish Council

Your ref: 4489/16  
Our ref: Woolpit – Land north of Old  
Stowmarket Road 00044369  
Date: 28 July 2017  
Enquiries to: Peter Freer  
Tel: 01473 264801  
Email: [peter.freer@suffolk.gov.uk](mailto:peter.freer@suffolk.gov.uk)

Mr Dylan Jones,  
Planning Department,  
Mid Suffolk District Council,  
Council Offices,  
131 High Street,  
Needham Market,  
Ipswich,  
IP6 8DL

Dear Dylan,

**Woolpit: Land north of Old Stowmarket Road – developer contributions**

I refer to the outline planning application (with all matters reserved, except for access), for the erection of up to 79 dwellings. This letter replaces my previous letter sent on 22 February 2017 which was time limited to six months. As this planning application will now be determined outside of this six months' period and recent information being made available on the education approach, the County Council will need to fully review matters.

Due to the significant levels of developer led growth in Woolpit, the District Council asked the County Council to consider options for expanding the current primary school on a temporary or permanent basis. As the District Council are aware, the existing primary school sits on a constrained site with significant highway issues arising at the start and end of the school day together with its close proximity to the Health Centre. The feasibility study was produced in February 2017 which confirmed the school cannot permanently expand within its own site.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of **£17,064** towards libraries provision.

This consultation response mainly deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Woolpit. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council

has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning applications, which when including the 79 dwellings from this proposed development, amount to 308 dwellings. The District Council's Housing and Economic Land Availability Assessment also identifies sites for potential housing or employment development allocation in the emerging Joint Local Plan. If additional sites are allocated it is expected that the number of new dwellings being considered will therefore exceed 308 dwellings.

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

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, which is set out 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 21 January 2016 and started charging CIL on planning permissions granted from 11 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:

- Public transport improvements
- 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 06 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 S106A contributions as they fall outside of the adopted 123 list. The details of specific S106A contribution requirements related to the proposed scheme are set out below:

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

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

The local catchment schools are Woolpit Primary Academy, Ixworth Free School and Thurston Community College.

## **Primary School**

The DfE publishes Area Guidelines (Building Bulletin 103) for schools which define the minimum areas of school buildings, playing fields, site etc. Woolpit Primary Academy is on a very small and constrained site with no possibility of expanding its boundary unless further land was acquired. It has a capacity of 210 places (1 form of entry) so according to the guidelines its minimum site area (including playing fields) should be 11,220 sq m. It has a site area of 11,973 sqm which excludes an early years setting. It is therefore at the optimum site area for a school of this capacity. Because of the unconventional layout of the site, it is not possible to add permanent accommodation to the school and no money will be spent on any permanent accommodation. However schools can take on extra pupils arising as a "bulge" by providing temporary classrooms. This might happen if there is a sudden spike in the local population, or as in this case, due to new housing developments providing it is only temporary until permanent places are provided elsewhere like a new school.

Pupil forecasts for Woolpit Primary Academy are showing a steady decline over the next 5 years; by 2021 the numbers are forecast to fall to 175 while the school's 95% capacity is 200. Hence there will be 25 spare places at the school, i.e. sufficient places for pupils generated from 100 new houses. The existing Primary School cannot be expanded within its current site.

SCC forecasts show that there will not enough surplus places available at the catchment primary school to accommodate all of the pupils anticipated to arise from this proposed development. How the spare pupil places are distributed between the four applications is for the District to determine but a suggested approach based on the percentage of pupils arising is recommended as follows:

The four undetermined applications in Woolpit include this application (4489/16) along with 1636/16, 2112/16 and 17/02767. They total 308 dwellings collectively which give rise to 183 primary pupils in total. This scheme generates 20 pupils which equates to 26% of the total pupils arising. Therefore 26% of the 20 pupils arising from this scheme accounts for 6 of the 25 surplus places available. This crediting of surplus pupil places is only applicable when dealing with S106 contributions.

## **Secondary Schools**

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. Current forecasts identify sufficient surplus places available for pupils forecast to arise from the proposed development, however when taking into account other development in the catchment it is likely expansion will be required which would fall under CIL.

Against the anticipated level of housing growth across the wider area, a full assessment of secondary school requirements is in the process of being analysed with the initial view that in due course a new secondary school will be needed in the vicinity of the A14 corridor. The best estimate of current cost is in the region of £25m, with a site of 10 hectares.

### Pupil yields

School level	Minimum pupil yield:	Required:
Primary school age range, 5-11:	20	14
High school age range, 11-16:	14	14
Sixth school age range, 16+:	3	3

### Primary pupils mitigation strategy

For many compelling reasons including improving education attainment, community cohesion and sustainability the highly preferred outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Woolpit. Where pupil bulges are anticipated the County Council will consider the provision of temporary classrooms but such an approach is only viewed as an interim measure if the longer term pupil forecasts indicate the need for permanent provision (by way of school expansion or a new school). Only as a last resort will the County Council consider offering places to pupils at out of catchment schools but this is seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of significant dis-benefits including negative impacts on education attainment, community cohesion, sustainability and costs. It is for the District Council to weigh up these important matters in considering the planning balance when deciding whether to allow or refuse planning permission.

A study has begun to look at the possibility of expanding the existing school if additional land was acquired to the north of the school site. If expansion is possible this would fall under the District's CIL funding. **As the expansion proposal has not been confirmed, the current approach is for a new primary school for the village with proportionate land and build costs secured by section 106 contributions. Should the expansion be confirmed the obligation in the s106 agreement will cease or be returned.**

Due to the current uncertainty over the scale, location and distribution of housing growth in the Woolpit locality it is not clear at this point in time whether the most sustainable approach for primary school provision is to:

- a. Retain a single primary school for the village by relocating and delivering a new larger school; or,
- b. Retain the current primary school and deliver a second (new) primary school for the village.
- c. Whichever strategy is the most appropriate a site of a minimum size of 3 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs). The site would be big enough to allow for futureproofing should the school need to expand further.
- d. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 10 primary age pupils requiring funding from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 79 dwellings including 6 surplus places it is forecast that 14 primary age pupils will arise
- Therefore 14 pupils x £16,429 per place = **£230,006 (2017/18 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £741,316 for a 3 hectare site and equates to £1,765 per pupil place. For the proposed development, this equates to a proportionate land contribution of 14 places x £1,765 per place = **£24,710.**

At present no land has been identified for education use within Woolpit, but SCC will work closely with Mid Suffolk DC to identify a site of 3 ha. Even though there is currently no identified new school site in terms of the CIL regulations, the 'project' required to support significant levels of developer led growth is the need for a new primary school.

## **Temporary classroom costs**

The physical constraints of the existing primary school site mean that a permanent expansion of the school is not possible. Therefore temporary arrangements will need to be explored to accommodate the additional pupils arising from new homes.

The Primary School does have its own grass playing field. Installing a double mobile (providing 60 places) may mean it is located on an area of hard play or playing field which would reduce the area of playing field available to the increased number of pupils. So in absolute and relative terms the area of playing field would reduce i.e. more pupils at the school sharing less outdoor play area. It is therefore preferable to locate a temporary classroom on non-playing field land within the school site but this is not possible in this situation.

A Feasibility Study was commissioned to assess whether the existing school site has space to accommodate this temporary expansion and it has confirmed it is possible. However this would result in some loss of school playing field and the difficulties that would arise in gaining Section 77 consent from the Secretary of State for a change of use from playing field to a temporary building.

While it is physically possible to set up a temporary building on the site, for many other reasons (loss of playing field, distance from main teaching block, planning restrictions, visual impact etc.) and not to mention whether the Academy Trust would grant permission, it would be reasonable to conclude that installing a double mobile on this site would be very difficult.

As an Academy the County Council has limited control over their decision whether or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs would fall into the District's CIL funding. At this stage SCC doesn't know how many additional houses the District Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, as well as an additional 25 pupils accommodated in the spare places in the school. The District Council will need to consider whether a planning condition to restrict occupation until permanent primary education provision is available locally that is an acceptable solution to support further development once the temporary provision places are used up by

additional development.

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

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

This development is the Woolpit ward where the only provider is Woolpit Arc. From September 2017 there is a predicted deficit of 24 places. This proposed scheme would result in approximately 8 pre-school children arising. Based on the expected scale of development in Woolpit, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m<sup>2</sup> (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 8 children of the total 60 who would be accommodated within the new setting, could be calculated as follows (costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
  - £500,000/60 early years pupils = £8,333 per place
  - From 79 dwellings there is the need for 8 additional places
  - Therefore 8 pupils x £8,333 per place = **£66,664 (2017/18 costs)**
- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
  - b. Play spaces are attractive, welcoming, engaging and accessible for all

local children and young people, including disabled children, and children from minority groups in the community.

- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

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

5. **Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.
6. **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:

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

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

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

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

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

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

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

- 9. 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.
- 10. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements of



the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

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

cc Neil McManus, SCC  
Sonia Docherty, SCC  
Chairman – Woolpit Parish Council  
Christine Thurlow, MSDC  
Steve Merry, SCC

**From:** RM Floods Planning  
**Sent:** 15 November 2016 12:25  
**To:** Planning Admin  
**Cc:** John Pateman-Gee  
**Subject:** 2016-11-15 JS reply Land north of Old Stowmarket Road, Woolpit IP30 9QS 4489/16

Suffolk County Council, Flood and Water Management can make the following initial comment:-

The surface water drainage of the proposed development is reliant on the outcome of a separate planning application for an adjacent piece of land (4491/16).

It is noted that the proposed discharge point from the surface water management/habitation creation area is outside of the red line boundary of either site and relies on a mechanism to convey the water either under or adjacent to the public highway.

Applicant needs to provide suitable evidence that infiltration will not work on this site, as this would be the preferred method for discharging surface water from the dwellings and the public highway.

There infiltration test results to BRE 365 are required to be submitted for this application.

The creation of a habitat for Great Crested Newts, is problematic as the waterbodies would need to be managed by a Natural England license holder

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864



**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: 4489/16

Referring to the planning application referenced above, dated 14 November 2016, application with all matters reserved, except for access, for the erection of up to 79 dwellings, Land north of Old Stowmarket Road, Woolpit IP30 9QS, 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> 5 December 2016
<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	