

Committee Report

Item No: 1

Reference: DC/17/1832

Case Officer: Elizabeth Flood

Description of Development: Outline Application (Access to be considered) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space and associated landscaping, engineering and infrastructure works

Location: Land to the west of Old Norwich Road and to the east of the A14, Claydon

Parish: Claydon Parish Council

Ward: Claydon & Barham

Ward Member/s: Cllr James Caston & Cllr John Whitehead

Site Area: 19.40 hectares

Conservation Area: No

Listed Building: No

Received: 12/05/17

Expiry Date: 11/08/17

Application Type: OUT – Outline Planning Application

Development Type: Largescale Major Dwellings

Environmental Impact Assessment: The proposal was the subject of a screening opinion and it was concluded that an Environmental Assessment was not required

Applicant: Ashfield Land Ltd

Agent: Mr Gareth Barton, Turley

DOCUMENTS SUBMITTED FOR CONSIDERATION

List of applications supporting documents and reports

- Planning Application Forms and Certificates;
- Planning Statement prepared by Turley;
- Plan - Proposed Site Access Arrangement
- Plan - Parameters Plan
- Plan - Concept Masterplan
- Plan – Framework Masterplan
- Plan – Redline Site Plan
- Plan – Site Location Plan
- Design and Access Statement by Urban Design Box;
- The Masterplan Report by Urban Design Box;
- Heritage Statement by Archaeological Project Services;
- Noise Assessment by Spectrum Acoustic Consultants;
- Ground Conditions Survey by Hydrock Consultants Limited;
- Ecology and Protected Species Report by Mr Tim Smith;
- Flood Risk Assessment by Hydrock Consultants Limited;

- Flood Map for Planning by Environment Agency;
- Land Contamination Assessment;
- Drainage Impact Assessment by Anglian Water Services;
- Landscape & Visual Impact Assessment by Aspect Landscape Planning;
- Noise Impact Assessment;
- Statement of Community Involvement by Curtain & Co;
- Sustainability Appraisal by Turley Sustainability;
- Transport Assessment by Transport Planning Associates;
- Interim Residential Travel Plan by Transport Planning Associates;
- Tree Survey;
- Utility Statement by Hydrock Consultants Limited;
- Agricultural Land Classification and Soil Resources by Reading Agricultural Consultants Ltd;

The application, plans and documents submitted by the Applicant can be viewed online AT [BLANK] via the following link <https://planning.baberghmidsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZW45CMPM817>. Alternatively a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

- It is an application for:-
Major residential development of more than 15 dwellings

PART TWO – APPLICATION BACKGROUND

History

2. There is no planning history relevant to the application site. Land adjoining the southern boundary of the application site (located within Ipswich Borough Council) does benefit from a recent planning permission for the construction of a regional distribution centre comprising 11,508 sq. m of Class B8 warehousing and 1,850 sq. m of ancillary offices (Ref: 16/00898/FUL).

All Policies Identified As Relevant

3. The local and national policies relevant to the application site are listed below and form part of the consideration of your officers. Detailed assessment of specific policies in relation to the recommendation and specific issues highlighted in this case will be carried out within the assessment:

Summary of Policies

NPPF - National Planning Policy Framework

FC01 - Presumption In Favour Of Sustainable Development

FC01_1 - Mid Suffolk Approach To Delivering Sustainable Development
FC02 - Provision And Distribution Of Housing
CS01 - Settlement Hierarchy
CS03 - Reduce Contributions to Climate Change
CS04 - Adapting to Climate Change
CS05 - Mid Suffolk's Environment
CS06 – Services and Infrastructure
CS07 - Brown Field Target
CS09 - Density and Mix
GP01 - Design and layout of development
H4 - A proportion of Affordable Housing in new housing developments
H7 - Restricting Housing Development unrelated to the needs of the countryside
H13 - Design and layout of housing development
H14 - A range of house types to meet different accommodation needs
H15 - Development to reflect local characteristics
H16 - Protecting existing residential amenity
H17 - Keeping residential development away from pollution
HB1 - Protection of Historic Buildings
HB08 - Safeguarding the character of conservation areas
HB14 – Ensuring Archaeological remains are not destroyed
CL08 - Protecting wildlife habitats
T02 - Minor Highway improvements
T09 - Parking Standards
T10 - Highway Considerations in Development

Details of Previous Committee / Resolutions

4. None

Details of Member Site Visit

5. None

Details of any Pre Application Advice

6. The applicant's Planning Statement identifies that they have undertaken consultation with local ward members, Claydon Parish Council, local residents, statutory bodies and other key stakeholders.
7. A pre-application meeting was also held with the District Council on 11 July 2016.
8. Door to door consultation was undertaken in December 2016 with residents from Claydon, Barham and along Old Norwich Road. This was followed by the distribution of a resident information leaflet to 3,000 households in Barham, Claydon and Whitton. The leaflet gave details of the proposed development and provided an opportunity for residents to provide feedback. A dedicated project website was also set up to allow interested parties to view the proposals online as well as submit comments and feedback.
9. The application is supported by a Statement of Community Involvement which sets out the consultations undertaken and the extent of the responses received.

List of other relevant legislation

10. Below are details of other legislation relevant to the proposed development.

- Human Rights Act 1998
- Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
- Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
- The Conservation of Habitats and Species Regulations 2010
- Localism Act
- Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

PART THREE – ASSESSMENT OF APPLICATION

Summary of Consultations

11. The responses below relate to the initial consultation carried out on the proposal;

Claydon & Whitton Parish Council – Claydon & Whitton Parish Council objects to the application based on the following points:

- Boundary Issues
 - Conflict with local plan
 - Drainage
 - In Conservation Area
 - Inadequate Access
 - Landscape Impact
 - Loss of Open Space
 - Loss of View
 - Out of Character
 - Sustainability
 - Traffic or Highways
 - Wildlife
1. Whitton Rural, where the land on the application is situated, such a large development would be totally out of character in this rural area and the community will lose its identity.
 2. Loss of village status. Claydon/Barham's character is that of a village and building 315 houses in the agricultural belt between Ipswich and Claydon will blur the boundaries and set a dangerous precedent.
 3. Old Ipswich Road must not under any circumstances be opened up as this will create a major traffic problem in Claydon. This road remaining closed retains the rural independence of Claydon/Barham from the Ipswich conurbation.
 4. Increase in traffic. According to the developers own report the Bury Road junction (A1156) is set to exceed capacity by 2022. This takes no account of the many developments still at planning stage or the revitalised Anglia Retail Park, which was virtually empty when they carried out their traffic survey.
 5. Overcrowding in schools. With this development, Claydon High School will be the closest and safest school to send their children to. Parents will fight to send their children to Claydon and any will succeed. Can the present schools accommodate this additional influx of students?
 6. Any development of this site would limit options for the siting of the northern bypass.
 7. This proposed development is not on land designated for building.

8. This proposed development is not within the existing settlement boundary.
9. Effect on traffic through Whitton Conservation area causes environmental concerns.

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

We request the following condition be placed on any grant of permission.

Before any development is commenced a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation including (but not limited to) details on environmentally friendly materials, minimum Green Guide ratings, construction techniques, minimisation of carbon emissions beyond Part L, running costs and reduced use of potable water (suggested maximum of 105ltr per person per day).

BMSDC Environmental Health Air Quality – Reviewed the application and can confirm that the likelihood, owing to road configuration, of this development impacting on the air quality of the Mid Suffolk district is negligible. Advise that the traffic flow from the site is towards key junctions in the Ipswich district and given the developments that as proposed in the area it might be prudent to establish from Ipswich Borough council their stance on potential impacts on the Norwich Road junction.

BMSDC Environmental Health Land Contamination – Reviewed the Phase I investigation and can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

BMSDC Environment Protection – Whilst appreciate that this is an outline application, recommend that the application be refused until such time as a more detailed noise assessment, based on the illustrative masterplan can be submitted. As stated, of the opinion that mechanical ventilation would be inappropriate and would suggest that other acoustic design features, such as the screening of the A14 by acoustic bund/barrier (as is the case with the Wolsey Grange application in Babergh, B/15/00993/FUL) be considered. As this is a key issue in the viability of the site, then would not consider it appropriate to deal with these matters by means of condition, as is suggested in the assessment.

If minded to approve this application, revert for further comment on any such condition as well as other conditions relating to the proposed equipped play area, the playing pitches (which appear to be in close proximity to dwellings) and the need for a construction management plan.

BMSDC Infrastructure Team – This development site lies within the high value zone for MSDC CIL Charging, and, if granted planning permission, would be subject to CIL at a rate of £115m² (subject to indexation). The CIL Liability is calculated on approval of details submitted under Reserve Matters. The Developer should ensure they understand their duties in relation to compliance with the CIL Regulations 2010 (as amended).

ECC Place Services Ecology – No objection subject to conditions to secure; a proportionate financial contribution towards visitor management measures for the Stour & Orwell Estuaries SPA/Ramsar, and ecological mitigation and enhancements.

ECC Place Services Landscape – Initial Response 5/7/17 - An appropriately detailed landscape and boundary plan will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal, suitable to limit any negative visual effect the proposal may have on the existing settlements.

Subsequent Response received 18/9/17 - This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site. Initial recommendations were submitted for this application on the 5/7/17. Based on these recommendations, further information has now been provided. This includes a Landscape Strategy and amendments to the Landscape and Visual Impact Assessment (LVIA).

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

- 1) The Landscape Strategy fails to show any visualisations or perspectives of the proposed development within the context of the surrounding landscape
- 2) If the application is approved, a detailed boundary treatment plan and specification will need to be submitted as part of a planning condition.
- 3) It would still be advised that further SUDs features are explored as there are many opportunities to include these as part of the streetscape and landscape design due to the sites topography.
- 4) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted as a condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDs features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics.

Further response received 19/10/17 – Following receipt of the visualisations, matters 2) to 4) remain to be addressed via conditions.

Highways England – Highways England's formal recommendation is that we offer no objection.

Ipswich Borough Council – The application was presented to the Council's Planning and Development Committee on 26th July 2017 and the report can be viewed online here:- <https://democracy.ipswich.gov.uk/mqChooseDocPack.aspx?ID=1919>

Members resolved that Ipswich Borough Council does not support the planning application for the following reasons:-

Ipswich Borough Council raises serious concerns in relation to the lack of a comprehensive assessment of the cumulative effects of the proposed development on this site in the context of other planned development in Ipswich Borough and any subsequent impact on the character of Whitton Conservation Area, through traffic and vehicle movements along the Old Norwich Road, and at the Bury Road/Norwich Road junction.

Of particular note are the developments which either have a resolution to grant planning permission and or are allocated for future development within the Ipswich Local Plan as adopted in February 2017. Given the status of the Local Plan, these developments should hold significant weight in the decision making process.

Natural England – There is insufficient information to enable Natural England to provide a substantive response to this consultation as required under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

NHS England – A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be £119,232. Payment should be made before the development commences.

NHS England therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission, in the form of a Section 106 planning obligation.

In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development. The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.

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. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.

The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development. NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.

SCC Development Contributions Manager – Initial response received 20th June 2017 as follows:

Sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site specific mitigation. This consultation response considers the cumulative impacts of housing growth on primary school provision.

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

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

The 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-making.

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

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

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

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

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

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 and charges CIL on planning permissions granted from 11th April 2016. Regulation 123 requires Mid Suffolk to publish a list

of infrastructure projects or types of infrastructure that it intends will be, or maybe, wholly or partly funded by CIL.

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

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

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

This consultation response mainly deals with the need to address primary school mitigation directly arising from the cumulative impact of developer-led housing growth in the Claydon locality. The County Council's view is that appropriate mitigation 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.

The details of the impact on local infrastructure serving the development is set out below and, apart from the proportionate developer contributions towards the land and build costs of a new primary school, will form the basis of a future CIL bid for funding:

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

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

SCC anticipates the following **minimum** pupil yields from a development of 315 dwellings, namely:

- a. Primary school age range, 5-11: 79 pupils. Proportionate contribution towards land and build costs of a new primary school.
- b. Secondary school age range, 11-16: 57 pupils. Cost per place is £18,355 (2017/18 costs).
- c. Secondary school age range, 16+: 13 pupil. Costs per place is £19,907 (2017/18 costs).

The local catchment schools are Claydon Primary School, Claydon High School and One.

Based on existing forecasts SCC will have no surplus places available at the catchment secondary schools for which CIL funding of at least £1,305,026 (2017/18 costs) will be sought.

At the primary school level the current thinking is the emerging need for a new primary school in the locality taking into consideration housing growth. This need will become clearer when overall housing numbers and likely locations are identified by the District. Ideally this would be identified in a plan-led approach but at present there is a large amount of developer-led growth. Based on this current situation it is therefore considered appropriate to secure a land reservation within this scheme for education use plus proportionate developer contributions to fund the delivery of a new primary school.

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

1. The current Claydon Primary School is at capacity and there is a capital project being pursued to expand it to 630 places in order to deal with existing growth in the locality. Further expansion of this school beyond 630 places is not a tenable option.
2. Whichever strategy is the most appropriate a site of a minimum size of 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).
3. 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 79 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 315 dwellings it is forecast that 79 primary age pupils will arise.
- Therefore 79 pupils x £16,429 per place = £1,297,891 (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 £494,200 for a 2 hectare site and equates to £1,177 per pupil place. For the proposed development, this equates to a proportionate land contribution of 79 places x £1,177 per place = £92,983.

2. Pre-school Provision. Refer to NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds. From these development proposals SCC would anticipate up to 32 pre-school pupils.

In the Ward of Claydon and Barham there is a surplus of places predicted in September 2017. On this basis no CIL funds will be sought for this proposed development.

Please note that the early years pupil yield ratio of 10 children per hundred dwellings is expected to change and increase substantially in the near future. The Government announced, through the

2015 Queen's Speech, an intention to double the amount of free provision made available to 3 and 4 year olds, from 15 hours a week to 30.

3. Play space provision - Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
 - a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.
4. Transport issues. Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highways provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Christopher Fish.

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

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

5. Libraries. The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £68,040, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting health communities'.
6. Waste. All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that

there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

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

7. Supported Housing. In line with Sections 6 and 8 of NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designed homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the local planning authority's housing team to identify local housing needs.
8. Sustainable Drainage Systems. Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

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

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

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

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

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

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

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

11. Legal costs. SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.
12. The above information is time-limited for 6 months only from the date of this letter.

Apart from the planning obligation requirements for the primary school land and build costs, the above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

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

Subsequent response received 24th January 2018

I previously submitted a formal consultation response to this planning application by way of letter dated 20 June 2017 to Mid Suffolk District Council which set out the planning obligation requirements for primary education provision. This letter provides further supporting information in respect of mitigation measures required to deal with local primary education provision.

Ideally, the County Council would like to see a plan-led approach to housing growth in the Claydon locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including primary school provision. To not consider and address the cumulative impacts of growth will result in a sub-optimal outcome for education provision in the Claydon locality – this would be contrary to the principles of delivering sustainable development, which is the golden thread running through the NPPF. There are numerous ‘hooks’ within the NPPF which support the County Council’s position.

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District’s planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

In paragraph 187 of the NPPF it states “Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.” The County Council’s positive solution to addressing the unacceptable impacts of the proposed development on education infrastructure is to secure a planning obligation to mitigate the harm arising in respect of primary education provision.

And in paragraph 17 of the NPPF it states “Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both planmaking and decision-taking.” One of these 12 principles say that planning should “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” The strategy of delivering a new primary school in the Claydon locality

to meet local needs ensures that housing growth, including this proposed development, is sustainable in respect of the NPPF and local plan policies.

The current planning application in Barham & Claydon under reference 1856/17 being promoted by Pigeon Investment Management is for outline consent for up to 300 homes, and includes a reserved site for a new pre-school and a new primary school. This position reflects the strategic requirement for a new primary school.

1. Schemes in the Claydon locality currently on our radar include:

- a) Reference 1832/17 – this scheme – application for 315 dwellings.
- b) Reference 1856/17 – application on land off Norwich Road at Barham & Claydon for 300 dwellings.
- c) Reference DC/17/04720 – pre-application enquiry on land east of Ely Road in Claydon for 77 dwellings.
- d) Blakenham Fields scheme – approved scheme of 426 dwellings currently being built out by Bellway Homes.
- e) Great Blakenham, land west of Stowmarket Road – approved scheme of 130 dwellings.
- f) Great Blakenham, Kingfisher Drive – approved scheme for 10 dwellings.
- g) Bramford, Paper Mill Lane – approved scheme of 176 dwellings.
- h) Bramford, land east of The Street – approved scheme of 130 dwellings.
- i) Bramford, Clarice House – pre-application enquiry under references 3520/16 & IP/16/00096/PREAPP for 122 dwellings.
- j) Refer to the SHELAA.
- k) The above gives a cumulative total of at least 1,686 dwellings in the locality. Based on our standard methodology of 25 primary-age pupils for every 100 dwellings that generates the need for a 420-place primary school.

2. The Claydon Primary School expansion planning application received a resolution to grant planning permission by the County Council's Development and Regulation Committee at its meeting on 16 January 2018. This is subject to the prior completion of a planning obligation and the imposition of planning conditions. The aim is to complete the project for the expansion of the school up to 525 places by September 2019. This expansion project will not deal with pupils arising from this proposed development.

3. The entry in the County Council's Budget Book is for a 'contractually committed scheme' which is a project for the expansion of Claydon Primary School up to 525 places. Refer to Cabinet meeting reports for meeting to be held on 23 January 2018 under agenda item 7 – Revenue Budget 2018-19 and Capital Programme 2018-21 – Appendix C – Annex E.

4. In respect of the developer contributions sought to mitigate the harm arising from this proposed scheme the following sets out the County Council's position:

- a) Build cost contribution (BCIS linked) of £1,297,891 (2017/18 costs) to be payable in 4 equal instalments – triggers being 25% prior to 50th, 125th, 200th and 250th dwelling occupations. To be secured by way of a planning obligation.
- b) Land contribution of £92,983 to be payable prior to 50th dwelling occupation. To be secured by way of a planning obligation.
- c) Use of the developer contributions – to be used towards the site acquisition and build costs of a new primary school in the Claydon locality to serve the new residents of the proposed development.
- d) The developer contributions will be secured for a period of up to 10 years and returned if not spent.

- e) A clause included in the planning obligation that will enable the full developer contributions to fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development.
- f) A clause included in the planning obligation that will enable the full or a relative proportion of developer contributions to fall away, or be returned in full, if in the interim the existing Claydon Primary School is expanded to 630 places (three forms of entry).

If the District resolve to grant planning permission subject to the prior completion of a planning obligation based on the above terms to mitigate the harm on local primary education provision, then any objections the County Council has to the proposed development in respect of primary education provision will fall away as adequate mitigation will be secured.

SCC Archaeological - This site lies in an area of archaeological importance recorded on the County Historic Environment Record. It is located in a topographically favourable location for human activity of all periods, overlooking a tributary of the River Gipping. Within the site itself, cropmarks of two enclosures have been identified (WHI 015 and 016) and finds scatters of prehistoric, Roman, Saxon and medieval date have also been recorded (IPS 093 and WHI 002). Further multi-period finds scatters have been recorded within the vicinity of the site (WHI 013, WHI Misc and AKE 011) and archaeological investigations immediately to the south identified archaeological features of Iron Age date (IPS 387).

Recent archaeological investigations to the north as part of the EA1 scheme have identified multi-period archaeological remains, and there is a known area of Saxon activity at Akenham to the west. As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, which has never been subject to archaeological assessment. Groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

Given the high potential, lack of previous investigation and large size of the proposed development area, 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 of the site prior to the determination of any planning application submitted for this site, to allow for preservation in situ of any sites of national importance that might be defined (and which area 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 and is consistent with the advice provided during site allocation consultations in 2014.

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

In order to establish the archaeological potential of the site, a geophysical survey will be required in the first instance. The geophysical survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this 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 heritage assets 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.

SCC Fire and Rescue Service – 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 Authority recommends that fire hydrants be installed within this development. 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.

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

SCC Flood & Water – Initial Response 22nd June 2017 - The following submitted documents have been reviewed and we recommend a holding objection at this time:

- Site location plan ref ASH102 1001
- Flood Risk Assessment & appendices Ref ONR-HYD-PH1-XX-RP-D-5001 S1
- Ground Conditions Desk Study Report Ref R/C-04210-C/001_Rev3

The reason why we are recommending a holding objection is because the applicant has not provided sufficient information to rule out the use of infiltration rather than discharging to a watercourse in line with NPPG. Discharge surface water into the River Gipping, Catchment 186 which is managed by East Suffolk IDB, will require the applicant to seek permission from the IDB regarding permission to discharge and a surface water developer contributions, but only if infiltration is proven not to be a viable method for the disposal of surface water.

The site is within a source protection zone (outer zone 2) and the River Gipping is a failing watercourse under the Water Environment regulation (Water framework Directive) 2009, therefore the applicant needs to demonstrate that they have sufficient surface water treatment stages as part of their indicative surface water management plan.

The point below detail the action required in order to overcome our current objection:-

1. Submit infiltration test results to BRE 365, minimum of five trial across the site.
2. Submit details of proposed surface water treatment stages
3. Submit details from the East Suffolk IDB re agreement in principle to discharge and developer contributions

Subsequent Response Received 4/10/17 – We recommend approval of this application following the submission of additional documents. Recommend conditions.

1. Site Location Plan Ref ASH102 1001
2. Flood Risk Assessment & appendices Ref ONR-HYD-PH1-XX-RP-D-5001 S1 P1.5
3. Ground Conditions Desk Study Report Ref R/C-04210-C/001_Rev3

SCC Highways – Initial Response 10th July 2017. To enable SCC highways to make a decision on the application, the following information is required:

- The flow diagrams for the 2016 Base, the Committed Development Flows and the 2023 with committed Development Flows to enable these scenarios to be reviewed.
- Full Outputs with a drawing showing junction measurements, phasing of the signals etc. are required as we consider the LinSig outputs provided are very light and enable us to check the assessment.
- Confirmation that the Baseline Model has been validated and by which method.
- We consider the development may have reasonable impact on Bury Road/Goddard Road Roundabout and Norwich Road/Meredith Road junction therefore we require capacity assessments in these locations.
- The MSOA used for distributing the trips is not the one where the site is located therefore justification for using this is required.

Second Response Received 26th July 2017. We are talking to the developer's transport associates regarding the additional information and data required on the traffic model to enable us to make a decision on the application.

Third Response Received 6th November 2017. Notice is hereby given that the County Council as Highway Authority does not object to the proposal subject to a S106 Agreement to its satisfaction and inclusion of the conditions shown below on any permission granted.

SCC Rights of Way – No objection to the proposal but with information notes.

Suffolk Constabulary – Realise as this is an outline proposal further details will be forthcoming at the reserved matters stage, particularly with regard to parking, however, have a number of concerns regarding this application. Strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.

Final conclusion, concerns with regard to the possibility of rear courtyard parking and undercrofts being implemented, which are known promoters for theft and anti-social behaviour. Have concerns about the parking and security for vehicles. Also have concerns around the security of the new footpaths and the already established footpath leading off from Old Norwich Road and how the perimeter with the existing properties will be secured.

Suffolk Wildlife Trust - We have read the ecological survey report (Tim Smith, Apr 2017) and we note the findings of the consultant. We also note the comments made by Essex Place Services ecology team (their letter of 6th July 2017).

Protected and/or UK Priority Species and Habitats

A number of protected and/or UK Priority species have been recorded on the site, these include slow worm (a protected and UK Priority species), foraging bats (protected species) and skylark (UK Priority species), foraging barn owl (a Suffolk character species) was also recorded. The site also contains

habitats which are potentially suitable for hedgehogs and stag beetles (both UK Priority species). Hedgerows, a UK Priority Habitat, are also present onsite.

A detailed mitigation plan is required in order to ensure that populations of these species are not adversely impacted by any proposed development. Such a strategy should include details of:

- measures to retain the slow worm populations onsite;
- a sensitive lighting scheme to protect foraging bats;
- measures to provide offsite compensation nesting plots for skylark;
- measures to protect stag beetles during any removal of suitable vegetation/deadwood;
- measures to ensure that any new development is fully permeable to hedgehogs;
- measures to ensure that the hedgerows are protected, enhanced and suitably managed in the long term.

The production and implementation of such a strategy should be a suitably worded condition, should permission be granted.

From the information provided in the application, it is unclear whether the proposed development will require any hedgerow removal. If any such removal is required we request that surveys for hazel dormouse are undertaken. As identified in the ecological survey report, this species has been recorded within 2km of this site and their known range has increased in recent years. Given the proximity of known populations to the application site, it is possible that they are present in the area.

Ecological Enhancements

The proposed development also offers the opportunity to provide ecological enhancements for a range of species, including nesting birds (such as swifts and house sparrows) and roosting bats. Should outline consent be granted, any reserved matters application should include significant ecological enhancements as part of its design.

Habitats Regulations Assessment (HRA)

The application site is within the 13km Zone of Influence (ZOI) for the Stour and Orwell Estuaries Special Protection Area (SPA) and the Stour and Orwell Estuaries Ramsar site. This application should therefore be subject to Habitats Regulations Assessment (HRA) under the requirements of the Conservation of Habitats and Species Regulations (2010) (as amended). This should include securing any required financial contributions. We recommend that further advice is sought from Natural England or the council's ecological advisers on this matter.

Representations

12. 65 representations have been received making the following comments (summarised);

- Reason for objection is the scale and dominance of a development of this size in a village like Claydon and Barham and the impact this would have on the community.
- We should not be building onto good agricultural land.
- Drainage and sewage has been a problem in Barham, only last year there was flooding on the west side of the Old Norwich Road, and yet this development would be on a hillside sloping down onto this road.
- Reason for objection is that Claydon is a rural village surrounded by fields which is the reason why people have chosen to live there and to buy a property in Claydon. Whitton is not far away but separated by farmland and still have access to A14.
- It is unacceptable to build on greenfield land when there are other options of brownfield sites and sites awaiting demolition such as Paper Mill Lane. The villagers have the right to remain a village surrounded by fields. Building on these is a total erosion of the countryside and, once it is gone, it

can never be returned. There are plenty of redundant industrial areas that are not being used or considered for use instead of digging up productive fields.

- The Old Norwich Road has been a successful bus route for many years, but it was a problem when it was the old A45, especially in winter when large vehicles used to get stuck going up the hill causing closure and long delays. The new properties would use this road as entry and exit from their estate causing so much more traffic in the village. It would affect the buses using this route and cause chaos between Old Norwich Road junction and Whitton Church Lane. This is not an improvement on the roads, it is going backwards.
- Any accidents on the A14 result in traffic being diverted to the Old Norwich Road A45 and this will cause chaos for the village.
- Local schools, doctor's surgeries, and pharmacies cannot cope at present let alone with another 900-1200 extra people. New doctor's surgeries and schools could be built. NHS and teachers already experience shortages with staff.
- The infrastructure of the local roads, and drainage systems always have been a problem so this would be worse with extra housing.
- There are a number of businesses and business parks on Old Norwich Road, Claydon. Businesses have lots of lorries travelling there and back a number of times throughout the day. Hillview Business Park is very busy with traffic and there is another smaller Business Centre/Park just past Orchard Grove, which recently applied to extend and also build a car park for 130+ vehicles.
- Cars and buses park along Old Norwich Road daily which is not convenient.
- Bridleways, a livery yard and footpaths all come out on Norwich Road and with so much extra traffic would be dangerous for all concerned. Horses will react to sudden noise and movements. They are flight animals and many of these local horses are ridden by young riders it would be very dangerous and irresponsible to allow a vast increase in traffic on this stretch of road.
- All the proposed building around Claydon and Barham has had a huge negative impact on the villagers, our way of life and ability to stay as a village and to not become a small town.
- The huge development at Masons in Gt Blakenham has resulted in so much more traffic in the village and so much more when the development is completed. Those householders will need doctors, schools etc and the schools can not cope.
- There will be a time when the old factory buildings that were Fisons on Paper Mill Lane, Claydon will be demolished and built on, that type of use is more acceptable as it will transform and use the site, but it will still result in more traffic and the pollution and more schools and doctor's places needed.
- Would not have moved to Claydon if wanted to live somewhere less quiet. Concerned about the changes to the village through this development.
- Right to keep our village as a village and not an overdeveloped 'town like' community. It will be detrimental to wild life and the countryside.
- Please do not allow this planning application to go through as what is intended will ruin our village.
- This is an overdevelopment of the site, it will turn a small hamlet into an instant village without the infrastructure of a village.
- This is a steeply sloping site, living at the bottom end of the site and knowing how water lays on the surface and is slow to soak in. Has enough study been carried out to cover drainage after violent rain, apologies after any of our houses are flooded isn't any use.
- Drainage is a very real concern for residents of Old Norwich Road, Whitton. The relatively impervious nature of the soil results in water getting away very slowly. Two houses have changed hands in recent years simply because the owners could no longer tolerate the poor drainage at their properties. The huge reduction in the area of open land which this proposed development would cause would greatly exacerbate the problem.
- It will further erode the buffer zone between Whitton Rural and Claydon. Will Ipswich absorb these areas eventually?

- The use of Old Norwich Road is the only access on and off this site with a potential of 400-500 cars travelling on this road on a daily basis is frightening when the current traffic problems are considered. It would appear a lot of the traffic will be going to and from Ipswich town further adding to traffic on the Bury/Norwich road or using Whitton Church Lane, which is used as a rat run, with the already approval of the Took Bakery Site. Grid lock looms. As the bus only access from this road to Claydon how long before this is opened up to relieve traffic problems created by the new developments?
- Understand the need for more housing but not at the expense of the existing residents lives, many of who are elderly.
- The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated. It is not within the development plan area. It is not within the existing settlement boundaries.
- In 2014 the site was described as located on greenfield and agriculture (grade 2) land. Now the vacant land has been graded lower. It states in this document Option 2 'would have a greater visual impact on the surroundings due to gradient and scale', 'the economic and sustainability impact would be dependent upon the need for the development and the scale and type of development proposed'.
- Whitton Rural is a hamlet of 14 properties on Old Norwich Road in the countryside. A ribbon development with fields, trees and open spaces. No street lighting, no mains drainage.
- It adjoins the Whitton Conservation Area.
- The proposed development is out-of-scale, over-bearing, out of character in terms of appearance compared with the existing developments in the area. 14+3315=2250% increase in dwellings, this must be a record.
- In 1987 the road was closed, with the A45 bypass being built in 1985. This factor and the existing pressure for development on the western edge of the area led to the area being designated in 1986 'the Whitton Conservation Area'. This area adjoins the proposed site Designation is intended to give greater protection from unsympathetic new developments, 'the council will take all reasonable measures to resist the introduction of new uses creating additional traffic, nuisance or noise likely to affect the character or appearance of the area.'
- It contains a number of historic buildings which are now officially protected, Listed Grade 2 including 712, 714, 720, 726, 728, 785 and 799.
- The intention is that a Conservation Area there will be more effective protection and control of the village street scene which is central to Whitton's charm and character.
- This is a Mid Suffolk proposal let Mid Suffolk take all the traffic, access to and from Claydon.
- In 1987 the Old Norwich Road was closed, with the opening of the new bypass. In 1997 the ONR was opened to allow 'Super route 88' single decker low emission buses and emergency vehicles with the use of rising bollards, activated by transporters on the local buses. This is an inadequate road with cameras that are not suitable to detect and record number plate recognition, added to this the withdrawal of the locally funded PCSO.
- 315 houses are likely to generate 1200 vehicular movements. These additional vehicles through a Conservation Area will add to air, light and noise pollution.
- Concerns about the blackspots outside the bungalows where people turn in the road and not on the roundabout.
- Whitton Church Lane is narrow and runs between listed buildings as its junction with the Old Norwich Road but it is used as a 'rat run' to the A14 for people from Henley, Westerfield, Rushmere and beyond. There is no chance of improving this junction with two listed houses either side of the junction.
- The junction of Old Norwich Road and Bury Road is heavily congested.
- Anglia Retail Park has recently been regenerated leading to a large volume of additional traffic.
- When Whitton Sports Centre and Whitton United Football Club have special events vehicles are packed both sides up and down the entire length of Old Norwich Road to 'the tank trap' in Whitton rural. Everyday people use the Bury Road end of Old Norwich Road as a park and ride.

- The road is used for motorbike training, driving schools, cycle clubs. It is part of the Sustrans Route 51, joggers, dog walkers, family groups, 50% of residents with mobility scooters and zimmers, children walking to and from Claydon schools. Let this area be an area for healthy countryside pursuits.
- This development due to go through a 'conservation area' does not appear to have been properly investigated, bearing in mind the extra traffic generated by the development of the Bakery site with more from the Whitton Football Club later and add the extra 25000 patients from a combined surgery from Deben Road, Norwich Road, and Chesterfield. They won't all walk!
- No mains drainage.
- Water supply beyond the existing development.
- This area has low unemployment.
- Ipswich Hospital is struggling with the population explosion and with people living longer.
- The best Ofsted schools are at Claydon, as this development is in MidSuffolk parents will choose Claydon. The schools are close to capacity. Add the other development in Barham, Great Blakenham and Paper Mill Lane Bramford. Where will the school and preschool places come from?
- Being rural and adjacent to a Conservation Area, natural flora and wildlife live undisturbed. See Tawny, Little and Barn Owls, Green and Spotted Woodpeckers, Slow Worms and Stage Beetles. It is a wonderful area for families and children to walk and explore. Once destroyed it will be lost forever.
- The visual impact on the surrounding area the unacceptably 'high density/over development' of the site with 315 dwellings adding to the just 14 dwellings in the ribbon development.
- The adverse impact which the proposed development will have on the character of neighbouring residual amenity of residents, the quite, open aspect and views over fields.
- In the EADT 22nd June 2017 the Mayor of Suffolk quoted Suffolk has 'the unspoilt countryside'. Is Suffolk a 'Green County' anymore? It would appear that the views of residents are not being taken into account. Wonder how many of the planners know the areas in question or have even visited them.
- Concerns over the standing water still in the tyre tracks three days without rain. It has appalling drainage. All of the tests conducted dig down about six feet and insert these pipes, fill with water to see how quickly it drains away (they, incidentally are bone dry), the issue is the surface that holds the water almost like a false watertable.
- Identity of the village would be lost and the joining up with Ipswich.
- Road census taking place in August when the road is used the least.
- The other plans for Paper Mill Lane, Old Norwich Road Snowasis Great Blakenham Cement Works and The Northern Ipswich Bye Pass are not thought of as a whole. What happened to the planning of these projects?
- Concerned about the future generation obtaining affordable houses but do we need all of these houses, not convinced.
- Highways issues are a major concern, Whitton Church Lane is an accident blackspot for people walking, cycling and in cars. It cannot cope now so 315 houses added to the road using the road, both ways. This development is in Mid Suffolk all the traffic should enter and exit to Claydon. All the money will go that way.
- Anglia Retail Park has been regenerated thankfully but has added greatly to traffic congestion.
- Where is all the employment for these people?
- Between Old Norwich Road and Ballater Close there is no footpath which makes any proposed school route very problematic based on the current infrastructure.
- By the estate access being proposed by Old Norwich Road, there is the potential for upwards of 600 personal and service vehicles being added to this road. Currently Norwich Road is the worst road in the town for accidents (including the local area A12 and A14); to propose to put an

additional 600 vehicles into the road that is already the worst road in Ipswich would seem to be callous at best, criminal at worst.

- There is a proposal for a left turn filter lane to access Old Norwich Road from Norwich Road, however this would not address those westbound vehicles turning right. The current junction has access for five vehicles at best before major congestion would be felt on Norwich Road. As the major artery into, and out of Ipswich from the western side, an increase of 600 vehicles per day would have a profound effect on the quality of life for local residents.
- The increased traffic from the stores at Anglia Retail Park are now being felt, and yet to experience a major commercial holiday with these stores in place. If a comparison is made with Hadleigh Road, which has a similar offering of stores although notably lacks the family centred activities offered at Anglia Retail, the traffic flow during peak times and commercial holidays causes a great deal of congestion and delay.
- Impact on people's time through delays with traffic.
- Impact the increase in traffic will have on pollution, particularly for the nursery/schools.
- Development will cause an additional 536 extra children requiring placement. This is an additional 18 extra classes of various ages that would need to be accommodated (based on a class size of 30). Ormiston Academy is recently coming out of special measures, and this increased volume would dramatically undermine the efforts of teachers and support staff.
- The houses beyond Whitton Church Lane have no main sewer service. This will require dramatic investment and further development which has not been included in the proposal. This would cause considerable adversity for local drainage and flooding.
- The A14 embankments have already taken most of the topsoil in the local area, the drainage available in this area would be incredibly poor and would be further exacerbated with this development.
- The proposal made is woefully short of resource, infrastructure, sanitation, education places, medical facilities, and police support.
- There is no positive outcome from this development beyond simple housing places.
- The quality of life for all local people, both those people who would move to the area and those people already living in the area, would be impacted immensely.
- The proposal as it stands is not fit for purpose.
- The 'rat run' on Old Norwich Road/Whitton Church Lane has a tonnage limit of 7.5. The lane does not have the infrastructure for heavy traffic and continually floods. Suffolk Highways are responsible for enforcing the restriction but do nothing due to lack of manpower. Artics, coaches and lorries over 7.5ton continue to use this 'rat run'.
- The traffic queues to get out onto Bury Road from the end of Old Norwich Road at the traffic lights are already dreadful at peak times and school times and this will only be worse with the increased number of cars.
- The development will be detrimental to our community.
- The application is unsustainable and the area is unsuitable for such a development.
- The proposal for a filter lane at the Bury Road junction is ill thought out as it will only encourage more traffic into Whitton Church Lane. It is just a narrow lane not meant for so much traffic. It is not built for the amount of traffic, shown by the number of potholes being filled every year, only this year it has been resurfaced.
- Removing the vehicle restrictions at the top of Whitton Hill to allow full traffic access to and from the social infrastructure at Claydon for residents of this proposal, and indeed to the Claydon junction of the A14, will further encourage west Ipswich traffic away from the Bury Road junction with the A14 onto Old Norwich Road and encourage yet more use of Whitton Church Lane as a route to the A14.
- This development backs onto the properties of Whitton rural. The vast majority of the residents are retired and moved to the area for that very reason. The increase in urban noise and of course

traffic caused by this development will have a significant impact on our current way of life, standard of living and no doubt detrimental to our health.

- The Old Norwich Road runs right through an existing conservation area to the south of the site and will therefore have a significant impact on wildlife.
- There is no capacity for queuing vehicles in the area which will bring the roads to a standstill.
- A suggestion to convert all the empty buildings into flats to house people. For example the Odeon, old Suffolk Council offices and many more which would save some money.
- The proposed plans for Barham Church Lane estates shows a lot of hard landscaping, where is the rain water proposed to go? At the moment a heavy rain/shower means substantial rain water running down Barham Church Lane and collecting at the junction with Norwich Road. The plan shows ponds, are they supposed to collect the water? Concerns over them becoming stagnant areas for mosquitoes and no one will take responsibility for them after practical completion of contract. If soak aways are proposed then the size and location will need to be carefully planned in the clay and chalk ground.
- The drains on the Norwich Road struggle to cope at the moment. The massive increase in volume will cause existing low lying properties to have sewage spilling from manholes and soil pipes. Has Anglia Water confirmed that their system has capacity for an extra 600 homes (not including any extra private extensions and house buildings).
- The west junction onto the Norwich Road will become a very busy intersection onto an already busy road. The Norwich Road is a busy cut through from the A140/A14 roundabout to the Claydon Business Park. Also school and office traffic from Coddensham and the surrounding villages. At peak times this will create a busy risky junction. The east junction out of the estate looks to be set at a tight angle onto a bend. There will be poor visibility onto an already busy road. This road takes traffic to the Henley Road/Colchester Road side of town. It also takes substantial traffic to the very busy Otley College.
- There is also proposed routes for the north Ipswich relief road starting in this area. This will then make the whole area of Claydon a very busy and dangerous place for all the children walking to the school next to the new estate and busy road.
- If the SnowOasis project gets the full go ahead all these factors coming together will create an extremely busy and dangerous area for families to be around.
- There is considerable traffic congestion on the Norwich Road between The Junction and the junction with Meredith Road. This is significant throughout much of the day, not just at peak periods.
- The current filter system at The Junction allows only three to four vehicles to turn right onto Bury Road, and usually only four to five to turn left into Norwich Road. The left hand filter lane into Norwich Road is restricted in width so no more than three vehicles can make use of the lane at any one time. This applies throughout the day. It is difficult to see how any significant improvement to peak hours throughout as implied by the forecast in table 8.1 can be achieved short of radical redesign of The Junction such as the widening of the traffic lane. The TA remains silent on how its forecasts would be achieved. The TA gives no indication of how any improvements in traffic flow will be achieved.
- Would there be allocation for two or more cars for off road parking. The failings of previous developments not allowing the future proofing of the design. It is now common for families to have multiple cars, if these are to be parked on the main roads then this will create more obstructions and hazards.
- It is important for children to have the chance to go to their local school as this will create a network of local friends that they will grow up with. If they have to go to a school further away they will not socialise as often due to the logistical problems involved.
- The development would change the nature of predominantly rural land that forms an important boundary between Claydon and North Ipswich. It provides a quiet and peaceful route to walk or

cycle between the two areas. It is out of all proportion and out of scale to the area in which it would be situated.

- The proposal to allow vehicles to filter left from Bury Road to Old Norwich Road is flawed. This proposal will risk delaying emergency vehicles no longer able to use the bus lane to get through The Junction as an emergency transit as waiting traffic builds back from the filter lane. Bury Road and Norwich Road are a prime route for emergency vehicles. The TA makes no reference to how these concerns would be accommodated.
- The TA's contention that the existing bus services provide a good level of service is not supported by the facts.
- The TA often attempts to persuade by assertion without any supporting evidence.
- No evidence from behavioural or other studies is provided to demonstrate that the expected socio-economic group occupying this development would most often travel the distances indicated other than by car.
- It is a national cycle route and very well used by many people aswell as children learning to cycle, and feel safe from traffic. It would not be a safe place to cycle if it were to become access to a large housing estate.
- The closest schools, doctors surgeries and other social amenities for the site will likely be located in Claydon. All these services are already stretched to the limit, building more housing without significant investment in community infrastructure is unsustainable.
- The proposed exit for the site onto Old Norwich Road/Bury Road is entirely unsustainable. The developers own report suggests the junction will be over capacity by 2022. The proposed solution is a designated left filter lane into Old Norwich Road from Bury Road (using existing Bus Lane). That will only encourage greater use of Whitton Church Lane as a 'rat run' and certainly does not resolve the right turn into Old Norwich Road from Norwich Road, for which there is little or no capacity for queuing traffic.
- There are three possible exits for this development; south onto Bury Road (proposed and by far the cheapest for the developer), north into Claydon (also very cheap and formed part of the developers original draft plans in 2016 but these plans were aborted when it was clear they would attract fierce objections from County Councillors on the planning committee), and south to the rear of the Existing Anglia Retail Park. The third option is clearly a better alternative to option one as it bypasses the Bury Road/Old Norwich Road junction, plus the existing infrastructure remains in place and unused at present as a result of the aborted Park & Ride extension. Ask prudent developer, seeking to minimise disruption to the local community and providing the best possible outcome for its residents, why is there no mention of these alternative exits from the site? More importantly why has there been no traffic analysis of these routes?
- Surely before any planning committee votes on such proposals, they should be provided sufficient traffic analysis for all of the possible routes and not just the one the developer thinks will cost least in terms of money and objections?
- Noise, disturbance, smells and fumes from the development will virtually eliminate most of the rare species, that live hunt and forage in the existing hedgerows such as woodpeckers, squirrels, badgers, kingfishers and many other species of birds.
- This development would directly impact on our privacy as residents for (quiet enjoyment) it would mean a total change in the way we live, and have enjoyed life here in Old Norwich Road.
- The Human Rights Act outlines; the protection of property gives every person the right to peaceful enjoyment of their possessions. This imposes an obligation on the state not to: interfere with peaceful enjoyment of property.
- With the development of the old Tooks Bakery site, new medical centre, 3 new surgeries (25,000) patients most with cars, and the Whitton maypole conversion to housing. This increase in urban noise and traffic will have a significant impact on our current way of life, standard of living and be detrimental to our health.

- Residents of Old Norwich Road currently have no main sewerage and rely on septic tanks and soakaways, residents already suffer from significant drainage and flooding issues.
- Often after heavy rainfall gardens get waterlogged ground and saturated plants do not survive. Some residents will not use their washing machine in case driveways get flooded.
- As a rural council, do not believe this development is in keeping with your planning ethos, especially so close to Ipswich, where will the Mid Suffolk boundary end and Ipswich begin.
- Whitton Rural is a hamlet of 14 properties on Old Norwich Road in the countryside. A ribbon development with fields, trees and open spaces and no street lighting, no mains drainage.
- Surely there are other exit options open for this application, why has the developer chosen what is clearly the most congested and unsustainable option? It makes no sense.
- It has been suggested that only 420 pupils will require places so the building of a new school has been deleted. How does the developer know the number of pupils who will be coming?
- Aware that open spaces will soon be a thing of the past but the people who chose to live here are, in the main, elderly and some do not have computers. They would appreciate information regarding any further developments but preferably by letter in plain English.
- The extra vehicles, around 600 will cause noise issues coming past my house. There is already constant queuing at the bottom end of Whitton Church Lane near to Old Norwich Road and traffic has always been an issue coming off the A14 past Asda to the junction of Old Norwich Road.
- Increased traffic along Whitton Church Lane would also put pressure on the very tight, blind turning from Old Norwich Road into Whitton Church Lane. These roads are not designed for the volume of traffic which this development would produce and the result will be a reduction in safety and quality of life for local residents.
- The junction of Whitton Church Lane and Old Norwich Road is totally unsuitable for the increased levels of traffic that would ensue from this development, and trying to make this into a major junction will cause gridlock and accidents on a daily if not hourly basis. Partly this is due to the traffic calming measures installed at the time when the road ceased to be the main route northwards from Ipswich but also because of poor lines of sight and the close proximity of the properties on either side of Whitton Church Lane, which are listed buildings.
- Travelling 12 miles away to Ransomes Europark for work, some evenings the queue is so long at Asda roundabout it can take more time to get from Asda to Whitton Church Lane than the 12 miles to get to Asda.
- Vehicles speed down the road now cutting through as it is and the road isn't big enough for the volume of traffic that this proposal will generate.
- Even more traffic will be generated by both the development currently underway in the Old Norwich Road/Bury Road area, (near King George Field), and the regeneration of Anglia Retail Park on Bury Road, which will bring in many staff and visitor cars even from well outside of the local area.
- Cause gridlock on Norwich Road and this gridlock would be at risk of tailing back from Ipswich town centre along the Norwich Road to Bury Road and onto the exit slip-roads of both the east and west bound carriageways of the A14. The traffic on this dual carriageway itself would then be susceptible to coming to a complete standstill.
- When vehicles travelling at the high dual carriageway speeds are forced to suddenly and unexpectedly pull up to a complete stop there is a real risk of road traffic accidents occurring. There is a strong likelihood of multiple-car pile ups, where the stationary vehicles are rear-ended and shunted into the back of each other. In these instances the number of people injured or killed in a single accident could be quite high.
- This hazard on the A14 would be exacerbated by the considerable number of heavy goods vehicles on the dual carriageway which use the Port of Felixstowe. The long stopping times and distances required by these heavy vehicles means that unexpectedly encountering stationary

traffic, on what should be a fast moving carriageway, certainly increase the risk of collision with the cars queuing ahead of them.

- High levels of pollution that would result from idling engines of vehicles when stationary in the almost inevitable gridlocks. This would not only affect residents in roads local to the development site, but also those living along the entire length of the gridlocked Norwich Road. Also affected would be the nearly 30 or so residential roads that adjoin the Norwich Road, where vehicles at a standstill in these roads endeavouring to get out onto the Norwich Road, would be pumping out high levels of fumes in close proximity to the houses. Exposing them to high levels of gridlocked pollution too.
- Tempers of drivers will increase with the mass of traffic all to filter-in especially a.m. and the usual rush hour, we are totally objecting to this going ahead.
- It is a wholly unsuitable site for a major development and if it came about it would have a very damaging effect upon the local area. Living immediately opposite to the site in question and a scheme of this magnitude would drastically affect our outlook and privacy.
- The planning notices suggest that the proposals are not in line with the provisions of the development plan, so cannot see how it could be allowed to go ahead. This statement alone should mean that this application is rejected, but unfortunately, as Mid Suffolk does not have an up to date local plan and has not demonstrated that it has a five year housing land supply the applicant is seeking to take advantage of the vacuum created and rely upon the National Planning Policy Framework (NPPF) to achieve his ends. This is an ill-conceived and entirely opportunistic application and ask the Planning Committee to reject it as it is highly unlikely that it would ever accord with the provisions of any further development plan for Mid Suffolk.
- In order to gain planning permission under the terms of the NPPF it is necessary that the applicant proves the sustainability of the proposed development. An examination of the site and the surrounding area reveals without doubt that the necessary infrastructure is not in place and that such infrastructure could not be provided adequately and sustainably.
- If this involved building a new school on the proposed site no doubt parents from outside of the development would ask for their children to attend it thus bringing even more traffic into the road.
- Although Mid Suffolk adjoins Ipswich Borough there has always been an obvious division between the two very different authorities but this scheme would in effect cause the two to merge together thus losing the individual character of rural Mid Suffolk. That would cause a very undesirable outcome.
- Seems to be a very bad scheme and one which would create far more problems and difficulties than benefits so urge planners to reject it.
- Express strong objection to the planning application.
- Very concerned about the impact on local services, roads and amenities. Significant loss of amenity.
- Proposal appears to be short-sighted and ill-conceived: this is not practical or realistic site for such a large development. It is out of all proportion and out of scale to the area in which it would be situated.
- Do not feel that this development has been adequately publicised or local residents adequately consulted.
- Live locally in Malkin Close but received no notification of the public meeting held on 30th June 2017 and so unable to attend.
- The first heard of it was when a leaflet was put through our door. This leaflet states that these homes will be in close proximity to schools, health facilities, and employment. How long is the average wait for a GP appointment????!!!
- The land in question is adjacent to the A14 which carries the HGVs to and from Felixstowe and the north creating significant traffic noise 24/7.

- The proposed development of the Tooks and possible building on St Georges playing field would impose extreme congestion on Bury Road Whitton Church Lane and Old Norwich Road, all of which are extremely busy.
- Aspects of the Transport Assessment are incomplete or inaccurate.
- Particular concern in relation to health and safety issues ruling out bus routes 9 and 10 as options, and the absolute inadequacy of the minimal redesign of the junction between Old Norwich Road and Norwich Road.
- The Transport Assessment repeats bland assertions that there would be little increase in vehicular traffic which is unsupported by evidence. Despite assurances it will generate substantial vehicular traffic to utilise local shops and chemists located 20 minutes walk away, longer if with children.
- There is no reference to how if at all increased traffic exiting Old Norwich Road will be facilitated. It is difficult to see how any significant improvement to peak hours throughout as implied by the forecast in table 8.1 can be achieved short of radical redesign of The Junction such as widening of the traffic lane. The Traffic Assessment remains silent on how its forecasts would be achieved.
- At peak periods not all vehicles turning right into Busy Road complete in one traffic light sequence. The Traffic Assessment gives no indication of how any improvement in traffic flow will be achieved.
- The proposal to allow vehicles to filter left from Bury Road to Old Norwich Road is flawed, which will have an adverse impact on all traffic flows, apart from those possibly turning left from Bury Road.
- It does not appear that you are even looking at the possibility of opening the Old Norwich Road at the North end to enable access or egress via Claydon, it would make the most sense and be the cheapest solution. Maybe the reason is because of the level of objection that would be raised by residents of Claydon or because they are better connected? It is also about making money and it would only cost a few thousand pound to reopen the Old Norwich Road but given Suffolk County Council has been known to spend millions on traffic lights in the centre of town, don't hold out much hope that common sense will prevail.
- The Traffic Assessment contention that the existing bus services provide a good level of service is not supported by the facts. It measures the distance to the route 9 and 10 bus stops at 1000 metres, but fails to point out that there is no pedestrian walkway at all on Whitton Church Lane towards and at the blind bend at the junction with Old Norwich Road. Health and safety considerations would surely require substantial alternative provision. It is misleading to include routes 9 and 10 as viable public transport options, and therefore there is inadequate public transport provision to support the development.
- The Traffic Assessment attempts to persuade by assertion without any supporting evidence; para 2.30 asserts, by careful implication, that occupiers of the development will have reduced need for their cars because they will use online shopping and home delivery, but what evidence is there that they will use their cars significantly less than other occupiers. Para 6.1 asserts, by careful implication, that occupiers of affordable housing do not own cars. What evidence is there for this?
- Within the Traffic Assessment there is no evidence from behavioural or other studies to demonstrate the contents of para 2.31, that the expected socio-economic group occupying this development would most often travel the distances indicated other than by car.
- The Traffic Assessment seeks to downplay the peak hour traffic impact from the development, this is open to challenge as it seeks to project around 160 vehicle journeys to and from the site during morning and evening peaks. This is wholly at odds with the existing number of trips recorded during the survey carried out in October.
- There are around 30 properties plus the Bail Hostel and Gatehouse Hotel which access from Old Norwich Road North. If these generate so many journeys why should 315 houses generate proportionately fewer journeys.

- Modern homes have on average 2 cars per household which would mean an extra 630 vehicles during both am and pm peak times, all trying to squeeze through a junction that is not built to accommodate the amount of traffic that is currently going through it.
- If this development ever starts, then the only way that makes sense is to re-open the Claydon Hill to all traffic, which will relieve the huge amount of stress on the Bury Road/Old Norwich Road junction.
- Having studied the applicant's final noise assessment report, like to highlight that properties on the Western fringe of the development it is suggested, will need to keep their windows shut for noise to remain SOAEL levels, those noted by the World Health Organisation to cause significant adverse effects to people's health. Amenity area's for those properties will exceed those limits on an ongoing basis by approximately 15-20db. For these reasons I feel the entire western section of the site is entirely unsuitable for residential property and therefore this application should be rejected.
- Highlight that NPPF 4.1.1 states, 'The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land stability. Paragraph 123 also states, avoid noise from giving rise to significant adverse impacts on health and quality of life as a result (of) new development.'
- The noise from the development will virtually eliminate most of the wildlife species that live, hunt and forage in the existing hedgerows around the site and of course on the site itself, which regularly include badgers, buzzards, squirrels, woodpeckers and many other species of birds.
- The new residents at this proposed development will be subject to 24 hours of road traffic noise. Sound readings taken at various times, day and night over 12 months have shown readings that very rarely drop below 60db even at night and lorries on the A14 can cause a peak at 80db. These readings vary across the proposed site and the wind direction has an impact. This noise will spoil people's pleasure of being in their gardens, and in hot weather with windows open continues noise in their houses.
- Whitton Church Lane is too narrow and vehicles of all widths do not always keep to the speed limits between Shakespeare Road and Old Norwich Road.
- Believe this proposed development is too big for the area and will not have adequate services to sustain it. Schools, doctors and other services are likely to be in Claydon and there is a danger that it will merge with Ipswich. I bet the people of Claydon will also object to this as well.
- Whitton Rural will be over populated by people and cars, it will be an 'add on' to Ipswich.
- All aware that we are in the midst of a housing crisis and homes need to be built but this should be done with the whole of the local community in mind and not just some of them.
- Highly object to this proposed development and believe that the development of new roads and main routes in and out of the area are desperately needed to bear the weight of already heavy traffic. Road conditions will deteriorate dramatically.
- There is already a development of approximately 3,500 houses to be built called Henley Gate on Henley Road, with no further road infrastructure proposed to the already busy local routes and busy A14 junction 53. Believe that this development is already sufficient housing for the local area and the need of further road developments and local amenities e.g schools, GP surgeries etc are required to ease the strain on the existing amenities which will be overwhelmed by the increase in population.
- There are plans to build a large number of houses for The Garden Development around Henley Road, Westerfield Road and Valley Road. These, and the Old Norwich Road house would eventually converge onto the same roads. It's well known this area has its crime and social problems, which demand a lot of police involvement.

- Do not think many residents either don't know or unaware of the impact of this development would have on them and the whole local vicinity.
- However much we protest or object to this proposed development, it is probably already planned for a commencement date to begin.
- Traffic will always be a major issue, and until we get someone with the guts to insist that the Northern bypass be constructed, Ipswich will become an enormous car park. As it is, many people avoid town and go further afield to shop because of rubbish roads.
- The application is by Ashfield Land Ltd, who is this company, where do they come from, are they out to make a fast buck in an area miles from where they're based? It seems that whoever came up with a development in this area, has never lived in the vicinity, and neither cares or is aware what impact it will have.
- The residents of Old Norwich would appreciate more information being made available to them by letters written in plain English. Not everyone has a computer and for those living on their own and unable to get out it would be appreciated.
- Refer to the information sheet put through our letter box today about the extra traffic that will be using Old Norwich Road. Already it is manic in the morning.
- Bet no councillors live in this area or it wouldn't happen.
- Regards altering the junction can't see it will make much difference. A lot of people turn right and have to stop passed the zebra crossing sometimes now. The whole junction needs altering.
- An application has already been approved for the erection of 65 houses with more to follow on the old Bakery Site in Old Norwich Road with all traffic coming onto Old Norwich Road. Understand that some local residents were bribed by the builders.
- People brought their property for peace and quiet not to be bombarded by traffic for people to make a quick profit.
- This is a 'B' Road and should only be used by existing local residents. It has a barrier at the end for use only by buses and cycles on their way to Claydon and there are two bridled ways. Understand that Claydon has refused permission for direct access.
- At the end of Old Norwich Road before 644, a road namely Maklin Close was created by the local council and 48 properties were built for new residents with their various forms of transport causing more traffic onto Old Norwich Road.
- Every morning, in School Term, about 30/40 children amass on Old Norwich Road to catch their bus to go to School and return in the afternoon, surely a danger to children by extra traffic.
- PPG15 makes clear that, 'it is fundamental to the government's policies for environmental stewardship that there be effective protection for all aspects of the historic environment.'
- The Local Plan conservation policy BE33 states: 'The council will seek to ensure that development proposals including change of use within or close to a conservation area preserve or enhance the character and appearance of the area. Particular care will be taken to protect open spaces and other collective peculiarities that contribute to the character of each area.'
- Construction traffic and ultimately up to 600 vehicle movements each day will not enhance the village street atmosphere which is one of the main contributors to the character of Whitton.
- The prospect of more cars in the hundreds trying to exit or enter Old Norwich Road at the Bury Rd. junction horrifies me.
- The prospect of more children trying to join local schools, who are already at capacity again horrifies me.
- Provision for a new doctors' surgery is a must in the above application if successful.
- When walking dog in the morning have to cross the road at the junction of Whitton Church Lane/Old Norwich Road and it's like 'bat out of hell' time. The cars coming down Whitton Church Lane hardly notice a pedestrian crossing/trying to cross, only interested in getting down Old Norwich Road at great speed to miss the lights. This is a very dangerous junction for both pedestrians and cars alike.

- The pavement outside our house is very narrow and cars drive up onto the pavement so they don't have to wait in line and can turn left into Norwich Road. Have had a few near misses coming out of the house onto the pavement with both cars and cyclists who use the pavement as part of the road.
- All the properties in Old Norwich Road a few yards north of the junction of Old Norwich Road and Whitton Church Lane have no mains drainage and have to rely on cess pits/septic tanks for drainage. Most of the properties backing onto the proposed site have very low lying front gardens and suffer from flooding issues in heavy rain especially in winter when the water table is higher. Experienced a flooded front drive on a number of occasions. The cess pits/septic tanks can't cope with the foul water and rain runoff and quickly fill and require regular emptying. Have had pit emptied 6 times between December and March and last winter was classed as 'dry'. If the building is allowed to go ahead there will be significant surface water run off which with the lie of the land will inevitably enter our low-lying properties. Understand the proposed site has a high concentration of clay soil giving poor percolation and therefore an enhanced run off.
- If the proposed development is allowed, is it possible to make it on the condition that the developer connects, at the developer's expense, all properties in Old Norwich Road to mains drainage if the property owners wish?
- A site inspection by the planning committee of this area would be very sensible so they can see the traffic problems for themselves.
- Is this a case of 'urban creep' where Claydon will be joined to and become part of Ipswich eventually, a reason to resist.
- The public transport is sadly not very good.
- Anticipated that vehicular trips associated with the residents and visitors of the proposed development could be minimised. They have not submitted any evidence that they can persuade the new residents to take up walking or cycling. Can they make it compulsory?
- Was their traffic survey taken during the school holidays? Sure they did not bother to look at the traffic when there are football games or summer fairs taking place at the club, nor when the Gospel Church is holding one of their functions, so it is impossible to get down the road for parked cars.
- Their provided data of traffic incidents is obviously incorrect. Their reported incidents are not adding up.
- This is green belt land, surely there are other more suitable sites.
- There is already a football club with playing fields almost directly opposite the proposed site. Why would they then be proposing two more playing fields? Surely enough are already available?
- Know it is policy to build more housing, but it would be lunacy to ignore the fact that these roads are not capable of handling all the extra traffic this site would bring, both travelling towards Ipswich and going into Claydon. If Claydon should survive this and remain a village that is. Please do not allow this application to go ahead.
- If this application is granted the community will suffer.
- Currently Suffolk Constabulary does not have enough traffic police officers to oversee the majority of the major roads and such an influx of numbers of building vehicles would require the presence of a police officer to ensure that the movement of traffic was not dangerous to school children and pedestrians and many of which in the village are quite elderly. A workman who holds a stop/go board does not have the legal authority to control vehicles on a public road.
- There has not been any mention of creation of local jobs to support this massive infrastructure project and that would mean that those working on the sites would have to be transported into the area creating again extra traffic each day.
- The demographic of the villages would change fundamentally and this in turn would have a direct impact upon social mobility within the region. The contractor informed at a meeting last week that the extra houses would not have any impact on road movement, that is being patronising, 315

plus houses may have 1 or 2 cars, so in effect that could mean an extra 1000 vehicles of the road, again creating a major congestion.

- Anglia Water's report (from the Pigeon web page) has documented that the new proposal has not taken into account the current strain on the pipe/sewage system currently in place and that they (Anglian Water) would not be able to sustain extra properties within the current infrastructure.
- Impact on flora and fauna.
- In the mornings the queue getting out of the Old Norwich Road is considerable either turning right to the A14 direction or left towards Ipswich. This is not only Old Norwich Road traffic but traffic which has used the Whitton Estate and the Whitton Church Lane as a rat-run, this development will add possibly 630 extra vehicles which would increase and compound the traffic above.
- Another proposed site being considered at Barham/Claydon, this again will increase vehicles on the Bury Road/Old Norwich Road junction as the traffic will get on the A14 at Claydon and any Ipswich bound traffic will join everyone else at the Bury Road Old Norwich Road Junction. Heard talk that opening the Old Norwich Road up to traffic again may be considered, this will impact the Old Norwich Road/Bury Road junction to the extent I would think that the queue would be from Claydon to Ipswich.
- The development would be out of character to the present rural surrounding enjoyed by many people pursuing their interests and leisure activities.
- This development would directly impact on my privacy as a resident. Lived here 23 years, some of immediate neighbours longer than that. In that time have enjoyed the peace and quiet the surrounding area brings in its current condition. If the development happens all that would be gone and it would mean a total change in the way I live and things I do now I would not be able to carry on enjoying. Not only would the development overlook and indeed overshadow my property and gardens and reduction of sunlight and daylight, also exposed to other forms of privacy invasion like noise, people, vehicles, and not to forget an increase in the carbon footprint of the area.
- The badgers seem to be being treated as unimportant because there are no sets present only a well used trail, but these trails could be to their sets so take the trail away and they cannot get to and from their sets.

The Site and Surroundings

13. The application site, which extends to approximately 19.4 hectares, is located to the west of Old Norwich Road on the north western edge of Ipswich. Whilst the site is entirely within the Mid Suffolk District, it immediately adjoins the administrative boundary for Ipswich Borough Council.
14. The site is roughly triangular in shape and comprises an open area of overgrown rough grassland, which is divided into three fields. It is enclosed by established mixed native hedgerows, vegetation and trees.
15. The western site boundary is formed by the A14, with Old Norwich Road and the gardens of existing residential properties marking the eastern boundary. The site adjoins existing grassland to the north and south. Land immediately to the south of the site does, however, benefit from a planning permission for the erection of new Class B8 employment floorspace (Ipswich Borough reference 16/00898/FUL).
16. The south eastern and eastern boundaries are made up of a combination of timber fencing, mature hedgerows and tree planting. The western site boundary is defined by a robust mixed native/non-native tree belt, which provides a strong degree of visual and physical containment

(with the A14 corridor behind). The tree belt extends to the north, defining the northern tip of the application site.

17. The site is located on a north east facing slope, which falls from approximately 45m AOD from the south west to approximately 20m AOD in the north east. The southern half of the site has a relatively gentle gradient, with the northern half initially being steeper but levelling out upon the approach to the northern boundary. The southern and northern parcels of land are separated by an east-west conifer belt. None of the trees are the subject of a Tree Preservation Order (TPO).
18. The site benefits from two existing access points from Old Norwich Road (via field gates). Old Norwich Road is closed to vehicular traffic between the application site and Hill View Business Park. A public right of way runs along the southern boundary, which connects to Old Norwich Road.
19. The application site is within Flood Zone 1 and is crossed by two National Grid EHV transmission lines, together with a third UK Power Networks transmission line across the centre of the site. A high pressure gas main also crossed the southern part of the site.
20. Whitton Conservation Area is located to the south east of the site, though the application site lies wholly outside of the conservation area and there are no listed buildings within the application site. The nearest listed building, Whitton Lodge, lies some distance to the south of the site.
21. The wider area surrounding the site comprises a range of uses, including retail, employment, residential and agricultural land. This includes the Anglia Retail Park to the immediate south, Hill View Business Park to the north and Whitton Sports and Community Centre to the east.
22. Ipswich town centre is located approximately 3.8km to the south of the application site, whilst the village of Claydon is approximately 1.5km to the north.
23. The site is within a comfortable walking or cycling distance of a range of key services and facilities, including:
 - Whitton Sports and Community Centre – 890m;
 - Hill View Business Park – 650m;
 - Meredith Road District Centre – 1.4km;
 - Anglia Retail Park – 1.1km;
 - Whitehouse Primary School – 1.4km;
 - Ormiston Endeavor Academy – 1.8km;
 - Claydon Primary School – 2.3km;
 - Claydon High School – 2km;
 - Thomas Wolsey School – 1.8km;
 - Westbourne Academy – 2.8km;
 - The Meeting Place Community Centre – 1.4km;
 - Whitton Clinic – 1.5km.
24. There are bus stops within easy walking distance of the site on Old Norwich Road (c.200m). The services available from the nearest bus stop operate on a half hourly/hourly frequency and serve Ipswich, Claydon and the surrounding area. A Sustrans National Cycle Route (Route 51) also runs along Old Norwich Road, which forms part of a wider connected route of over 200 miles. The nearest railway station is located in Ipswich c.5km to the south of the application site.

The Proposal

25. The application seeks outline planning permission for up to 315 new dwellings and associated development.
26. All matters are reserved for subsequent approval, with the exception of the means of access from Old Norwich Road. The precise number of units will be determined by a subsequent reserved matters application(s). A significant amount of technical information is, however, submitted in support of the application which is largely predicated on the basis of 315 dwellings.
27. The proposed development is expected to comprise a mix of house types and sizes. Whilst the exact breakdown will be agreed through subsequent reserved matters applications, it is likely that the development will comprise 1, 2, 3, 4 and 5 bedroom houses of 2, 2.5 or 3 storeys. The Parameters Plan sets out zones where three storeys will be achievable and other areas where heights will be restricted to a maximum of two storeys. Dwellings which are 2.5 storeys will utilise roof space by incorporating dormer windows.
28. The proposed development will also provide 35% affordable housing, totalling 111 dwellings.
29. Two all modes access points will be provided to the site from Old Norwich Road. The main access will be provided to the south, with a secondary access being provided to serve the northern parcel. The two access points will be linked within the development.
30. A bus only access/egress is also proposed to the northern parcel, and the applicant is seeking to redirect the existing bus routes through the development. The existing public right of way running along the southern site boundary is to be retained along its existing route.
31. The internal road network will be designed to ensure suitable vehicle access to all properties. A principal route is proposed through the development to provide orientation and legibility. A hierarchy of quiet streets will lead from this central avenue, including lanes and private drives.
32. Trees and hedgerows along the existing field boundaries will be retained and enhanced where possible. Within the site itself a majority of the existing trees and hedgerows are retained. Additional amenity planting is proposed along boundaries shared with existing rear gardens.
33. A total of 3.7 ha of public open space and 4.3 ha of strategic open space will be provided as part of the proposed development. This includes playing pitches, a community play area, and green walking routes.
34. A sustainable urban drainage system is proposed at the north east and south east corners of the site. This will form part of the public open space area and also provide an ecological habitat.

Main Considerations

35. The following are identified as the main considerations in assessing this application.

The Principle of Development

36. The National Planning Policy Framework (NPPF) requires Councils to identify and update on an annual basis a supply of specific deliverable sites sufficient to provide for five years worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.

37. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted. The presumption in paragraph 14 also applies where a proposal is in accordance with the development plan, where it should be granted permission without delay (unless material considerations indicate otherwise).
38. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However, in May 2017 the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e. it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
39. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...' The NPPF (Paragraph 49) states that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. For sites to be considered deliverable they have to be available, suitable, achievable and viable.
40. Case Law suggests a "narrow" interpretation of 'relevant policies for the supply of housing', but that the decision maker must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
41. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) recommends that the starting point for calculating the 5 year supply is the housing requirement figures in adopted Local Plans, unless significant new evidence comes to light. The Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. It is for the decision taker to consider appropriate weight to be given to these assessments.
42. A summary of the MSDC 5 year land supply position is:
 - i. Core Strategy based supply for 2017 to 2022 = 3.9 years

ii. SHMA based supply for 2017 to 2022 = 3.9 years

43. Policy FC01 is the local reflection of the presumption in favour of sustainable development and is embedded within the development plan. It includes the position that where relevant policies are out-of-date at the time of the decision, the Council will grant planning permission (unless material considerations indicate otherwise), taking into account whether any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF overall, or specific policies in the NPPF indicate that development should be restricted. Since there is not, on any measure, a 5 year land supply, paragraph 49 of the NPPF deems the relevant housing policies of the Core Strategy to be out-of-date, so triggering both the 'tilted balance' in paragraph 14 of the NPPF, and the operation of Policy FC01.
44. The NPPF requires that development be sustainable and that adverse impacts do not outweigh the benefits to be acceptable in principle. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:
- *"an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:*
 - *a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
 - *an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*
45. In light of all of the above, this report will consider the proposal against the three strands of sustainable development, and also give due consideration to the provisions and weight of the policies within the development plan in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability Assessment Of Proposal

46. The NPPF provides (Para 187) that *"Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."*
47. As detailed above, in applying the 'tilted balance' required by paragraph 14 of the NPPF, the Council must decide what weight to attach to all the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies. In that regard, whilst it is for the decision maker to determine the weight that is to be given to these policies, it is your officer's opinion that policies CS1 and CS2 of the core strategy, FC2 of the Core Strategy Focused Review, along with policy H7 of the Local Plan, should not be considered up-to-date.
48. The assessment of this proposal, therefore, moves to the three dimensions of sustainable development set out in the NPPF.

49. Whilst the application site falls within the parish of Claydon, it is to the south of the village and separated by a natural break where the proximity of the A14 and Old Ipswich Road (which leads south out of the village of Claydon and becomes Old Norwich Road leading into Ipswich) is such that the roads form a distinct 'pinch point' separated by a small wooded area. The site is, therefore, better related to Ipswich in terms of both its proximity and its physical relationship. However, for the purposes of planning policy, it is within the countryside and outside of any settlement boundaries.
50. Paragraph 55 of the NPPF sets out that local planning authorities should avoid isolated homes in the countryside. The site is not considered to be 'isolated' within the meaning of this term as it is adjacent to existing residential dwellings and within reasonable distance of day-to-day facilities and services. Paragraph 17 of the Framework sets out a series of core planning principles, including to "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*". It is your Officer's opinion that the site represents a sustainable location, being easily accessible to a range of primary and secondary services and facilities, employment opportunities and public transport and cycling routes, and these shall be subject to more detailed assessment later in this report. This includes access to education, employment, retail, services and facilities, sports and recreation via means of transport other than the car. The site also offers the opportunity to maintain or enhance existing bus, cycle and pedestrian routes, which are readily accessible from the site.
51. There is not, therefore, an in principle reason to reject development of this site solely because it is outside any settlement boundaries. The assessment to be made needs to take account of the economic, social and environmental elements of the scheme and balance these accordingly, relevant development plan policies and whether there are specific policies in the Framework which would direct that development should be restricted.

Economic Dimension

52. The economic benefits of the proposed development should be afforded due weight in the determination of this planning application. Paragraph 19 of the NPPF states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth, thereby 'significant weight should be afforded to the need to support economic growth through the planning system'.
53. New housing in this location would help to contribute to growth in the local and wider economy. Whilst there is no direct provision of new employment (outside of the construction period), the provision of market and affordable housing, and the associated spin off benefits, will support wider economic objectives.
54. The proposed development will help to stimulate additional future expenditure and investment to the benefit of the local economy. The increased number of local residents generated by the development will result in increased spend and footfall in Ipswich and Claydon, supporting and benefitting the existing retail and service offer.
55. The proposed development will generate a number of jobs during the construction period. The applicant identifies that research by the Home Builders Federation (HBF) estimates that every new home built generates 1.5 direct construction jobs. Applying this figure to the proposed development, it is anticipated that up to 472 jobs could be generated. The proposed development would also generate construction related indirect and induced economic benefits. This would see additional jobs being supported within the supply chain, related businesses and onward expenditure within the district during the construction period.

56. The construction of the new homes on the application site would generate additional Council Tax revenue for Mid Suffolk District Council. The applicant identifies that *“The proposed development also has the potential to generate circa £2,429,653 New Homes Bonus payment for Mid Suffolk District Council, and £607,413 for Suffolk County Council (based on Band D), over a six year period. This would increase to £2,928,136 and £732,034 respectively for Band E properties. This would provide an important source of revenue funding for the Local Authority in delivering public services as well as investing in maintaining and enhancing infrastructure within the locality”*.
57. The proposed development will therefore generate a substantial amount of developer contributions, tax receipts and grant funding which can be used by the District Council and Parish Council to support the provision and enhancement of local services. Although Planning Practice Guidance advises that such local finance considerations can only be considered insofar as they are material to the proposed development, it nonetheless represents a significant benefit which will arise from the development of new homes.
58. In conclusion, the application site is a sustainable location for new development, located close to the settlements of Ipswich and Claydon. The provision of new housing can deliver a range of wider benefits, including growing the local population and increasing the supply of labour. This will ensure that local businesses are able to draw upon residents to maintain and grow the local economy and achieve the aspirations of the adopted and emerging development plan.
59. The development is, therefore, considered to be economically sustainable.

Social Dimension

60. Paragraph 7 of the NPPF identifies that the social role of sustainable development encompasses *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”*.
61. The proposal would provide market housing which will contribute to the current housing supply shortfall, and which is considered to be deliverable in the terms set out in the NPPF (see later section on deliverability). This sits comfortably within the definition set out in paragraph 7 of the NPPF, and it is noted that the proposal would deliver a mix of property sizes and forms, thereby making a positive contribution to the housing market, covering a breadth of needs and which offers competition and widens the opportunities for home ownership.
62. Furthermore, the scheme would make a considerable contribution to affordable housing in the district, providing upto 111 affordable homes. This is a significant social benefit, which will be weighed accordingly in the overall planning balance carried out at the end of this report.
63. The site is well served by public transport and lies on a Sustrans cycle route. The site also benefits from a footway that runs the length of the road, linking Claydon and Ipswich. The site is inherently accessible, by a range of transportation modes.
64. A significant element of open space is also provided within the scheme, including new sports pitches and green space which can be used for a variety of recreational pursuits.
65. For these reasons, the proposal is considered to be socially sustainable. However, prior to moving onto the environmental aspects of the proposal, it is considered appropriate to consider

the deliverability of the scheme given that this aligns directly with the social and economic dimensions of sustainability.

Deliverability

66. The deliverability of development sites is an important factor in both their sustainability (in terms of their tangible delivery of benefits) and in terms of their contribution to the supply of housing in the district. The NPPF states that *“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans”*.
67. The applicant identifies that the delivery of new housing, including affordable housing, is a key government priority to be achieved through the planning system. National planning policy, as contained in the NPPF, requires LPAs to achieve the effective and timely delivery of new housing and that the Strategic Housing Market Assessment (SHMA) for Babergh, Mid Suffolk and Suffolk Coastal District Council’s and Ipswich Borough Council, published in August 2012, identifies that:
- A lack of choice of housing that affects mobility within the labour-market and, therefore, the economy.
 - The Ipswich HMA contains fewer people aged 20 to 40 when compared to the national average, but comparatively more people at or approaching retirement age and older people.
 - A backlog of over 4,000 households in need of a suitable and affordable home in the Ipswich HMA. The supply of new affordable homes and the reuse of existing stock are not sufficient.
 - The delivery of new homes is vital to providing the level of housing, particularly affordable housing, that an area needs.
 - More than ever, new homes need to be built, not only to meet demand, but to deliver the affordable homes that are needed.
68. The proposed development will deliver up to 315 dwellings, of which up to 111 could be affordable. The proposals would therefore lead to a significant increase in the number, and mix, of affordable housing available in the local area and wider district. This is a significant benefit given the persistent under delivery of, and continued need for, affordable housing in the district. The applicant sets out that *“the application site is solely in the ownership of Ashfield Land and is available for development now. There are no impediments to it being brought forward. It also offers a suitable location for development now and, as demonstrated by the technical documents submitted in support of this application, is achievable. The proposed development is therefore capable of contributing to the delivery of housing in the next five year period, as well as improved community infrastructure through CIL and S106 contributions”*.
69. Set against this is the delivery of the new primary school which, currently, is not the subject of formal plans for development. However, SCC have confirmed that contributions to the school should be sought through planning obligations (in the form of a contribution) imposed on this development which the applicant has confirmed they are able to provide. As such, SCC have confirmed that the proposal makes sufficient contribution to the delivery of a new school such that they would not object to the proposal and the impacts are, therefore, effectively mitigated.
70. As such, in conclusion, it is your Officers view that the development is deliverable in terms of the NPPF and that this should be weighed accordingly in the overall planning balance when determining this application.

Environmental Dimension

71. This dimension gives rise to a number of factors that require consideration in the decision-making process. These are looked at under relevant sub-headings, as follows;

Impacts on Landscape and Arboriculture

72. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan. The application is made in outline form with only access for consideration as a matter of detail. As Landscaping is a matter reserved for consideration at a later date, this assessment therefore considers the impacts on the wider landscape and the potential for landscaping as part of the proposal and how that would be integrated into the development.
73. A Landscape and Visual Assessment and Landscape Strategy has been submitted in support of the application, and these have been assessed by the Council's Landscape Consultants. Initial assessment of the application documents resulted in concerns on a number of aspects, which resulted in the LVIA being amended and the production of the Landscape Strategy. These were the subject of further consultation, and the most recent observations of the Landscape Consultants are that;
- If the application is approved, a detailed boundary treatment plan and specification will need to be submitted as part of a planning condition.
 - It would still be advised that further SuDS features are explored as there are many opportunities to include these as part of the streetscape and landscape design due to the sites topography.
 - A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted as a condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior to construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics.
74. The matters listed above fall, primarily, for further consideration at the detailed stage of this development, relating to details of boundary treatments, layout/streetscapes and detailed landscape management and planting specifications. The concept masterplan submitted with the application demonstrates that there is potential to provide good levels of open space and landscaping in the site boundary to provide softer edges to the development and to provide some relief to the main areas of development. Therefore, there is no objection in principle to the indicative landscape proposals for the site.
75. Turning to the outward impacts of the development, it is apparent that the proposal would result in a significant change in the character of the locality. Whilst there is a strong hedgerow for much of the site boundary with Old Norwich Road, there are elements of the site that would be highly visible from the road (particularly from Old Norwich Road but possibly from longer views on the A14 also) where the change in outlook needs to be considered in terms of how the development would be appreciated in the landscape.
76. From Old Norwich Road, when travelling north away from Ipswich, the site provides a clear delineation between the town and Claydon. The sporadic nature of development along this part of

Old Norwich Road gives an appreciation of this being the edge of the settlement and the site makes an important contribution in this regard. However, the site is not the subject of any specific landscape designations, nor is it designated as Visually Important Open Space. In this respect, the main consideration here is to what extent the introduction of built development into this space would harm the landscape and result in coalescence between Ipswich and Claydon. This latter point is one which the Parish Council have raised as being of particular concern, as have a number of local residents.

77. The proposal would result in the introduction of dwellings in closer proximity to Claydon than those which currently exist along Old Norwich Road. Furthermore, the scale of the development would be significant in terms of the size of the scheme relative to the scale of development to the south. The proposal would, therefore, result in some landscape harm in terms of the relationship that it has to the existing pattern of development in the locality, and would read as an extension of Ipswich into this countryside location. This harm will need to be balanced in reaching a decision on this proposal, and all opportunities to minimise that harm at the detailed design stage should be taken should outline planning permission be granted.
78. However, it is considered that the proposal would not result in the coalescence of Ipswich and Claydon. Claydon would remain as a separate village, where there are a number of fields and a small wood area separating the village from the development on this side of Old Norwich Road. Furthermore, the manner in which the site narrows towards the northern end means that it would not be possible to develop any further north. The village would not, therefore, read as part of Ipswich (such as villages such as Rushmere St Andrew and Kesgrave do in the east) and would not have a dissimilar relationship to other villages lying to the north of the town such as Akenham and Westerfield, each of which are clearly identifiable and distinct.
79. Therefore, in landscape terms it can be concluded that the proposal would result in some harm due to the change in character of the area and the scale of the proposal relative to the existing pattern of development. However, there is no objection from the landscape consultants and the scheme provides sufficient space and provision for appropriate landscaping to be accommodated at the detailed stage to mitigate localised impacts and would not result in coalescence of Ipswich and Claydon.
80. Turning specifically to the matter of arboriculture, the trees within the application site are located along the boundaries. A tree constraints plan has been produced to support the application. This has been used to guide the development of the concept masterplan, including:
- There is a preference to retain the Category A trees (an pair of Elm) on the southern boundary as part of the scheme, preferably as part of the proposed area of public open space.
 - New tree planting should be considered within the proposed development in the form of street trees or incidental trees within proposed open spaces.
 - Appropriate buffers to existing trees should be provided to ensure their long term retention. Root protection zones are to be maintained within the layout and protected during the construction period.
 - Existing trees and hedgerows should be retained where possible.
81. These principles are acceptable and will guide the approach to how these trees are accommodated within the detailed design proposals, should outline planning permission be granted for the development.

Impact on Heritage Assets

82. The application is supported by a Heritage Assessment. The site does not lie within or adjacent to a Conservation Area, and the nearest listed buildings are some distance to the south of the site, set within the built-up part of Whitton.
83. The proposal would not be able to be viewed in the same context as these listed buildings and would not affect their setting, which is clearly identifiable and defined.
84. The Parish Council have raised concerns over the in increased traffic accessing the site through the Whitton Conservation Area. The northern extremity of the Conservation Area lies to the south of the site but is not adjacent to it. Paragraph 134 of the NPPF states that "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use*". The impacts upon the Conservation Area are considered to be limited to the potential increase in the amount of vehicles in the locality, thereby affecting the appreciation of the Conservation Area, and a potential increase in people accessing the area. In this regard, the proposal is considered to cause less than substantial harm, albeit to an extremely low extent, whereby the public benefits of the proposal will need to be balanced against the less than substantial harm.
85. The balancing exercise, as set out in paragraphs 132-134 of the NPPF is therefore engaged and will be undertaken in the Planning Balance section of this report.
86. The Archaeological Service have identified that this site lies in an area of archaeological potential recorded on the County Historic Environment Record. It is located in a topographically favourable location for human activity of all periods, overlooking a tributary of the River Gipping. Within the site itself, cropmarks of two enclosures have been identified (WHI 015 and 016) and finds scatters of prehistoric, Roman, Saxon and medieval date have also been recorded (IPS 093 and WHI 002). Further multi-period finds scatters have been recorded within the vicinity of the site (WHI 013, WHI Misc and AKE 011) and archaeological investigations immediately to the south identified archaeological features of Iron Age date (IPS 387).
87. Recent archaeological investigations to the north as part of the EA1 scheme have identified multi-period archaeological remains, and there is a known area of Saxon activity at Akenham to the west. As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, which has never been subject to archaeological assessment. Groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist. The Archaeological Service had, therefore, requested that a full archaeological evaluation be undertaken.
88. However, subsequent to that response, the applicant's archaeological consultant has engaged with the Archaeological Service and agreed a Written Scheme of Investigation for the site. The agreement reached with the Archaeological Service is that the intrusive works can be carried out post-committee if a determination to grant planning permission is made. In this regard, where a recommendation of approval is to be made on this application, this would need to be subject to the carrying out of these intrusive works and confirmation of the satisfaction of the Archaeological Service to the results of those works.

Design and Layout

88. Paragraph 56 of the NPPF states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area and create a strong

sense of place. Furthermore, it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or stifling appropriate innovation.

89. The NPPF goes on to state it is *"proper to seek to promote or reinforce local distinctiveness"* (Para 60) and permission should be *"refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions"* (Para 64). In addition, policy CS5 provides that *"All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area"* and thereby echoes the provision of the NPPF.
90. The matters of layout, scale and landscaping are reserved for consideration at a later date. However, the application is supported by a concept masterplan, framework master plan, parameters plan, Design and Access Statement and a supporting Masterplan Document which sets out the basis for how development could occur on the land. It is apparent, therefore, that the applicant has given due consideration to the way in which this site could be laid out and designed.
91. The Framework Masterplan sets out 15 key points within the development, which are described as follows;
 1. Main access to the site from Old Norwich Road with a secondary access to the northern part of the site from Old Norwich Road.
 2. Existing pedestrian footpath retained on site and linking to Old Norwich Road;
 3. Bus only egress onto Old Norwich Road allows potential diversion of the existing bus route through the site.
 4. Existing hedges and trees belts retained as far as possible to soften the development, add character and provide ecological links north-south and eastwest;
 5. Large usable areas of POS provide green corridors through the development, around the existing hedgerows;
 6. Equipped play area sited within a large open space within the centre of the site and accessible to all;
 7. Buildings address POS and streets with shared space / private drive frontage to promote quiet streets;
 8. Perimeter block development provides well overlooked streets and private garden spaces;
 9. All green spaces have frontages overlooking them to provide natural surveillance;
 10. Higher density development creates a focus within key spaces and along a formal avenue which provides legibility to the development;
 11. Shared surface square includes parking and landscaping within the street, prioritising pedestrians and reducing the dominance of the car;
 12. Low density development on the edges overlooking a green corridor along the hedge line;
 13. New street and incidental tree planting softens the development form creating a layered effect of trees and roofscape;
 14. Opportunity for SUDS scheme with potential for ecological enhancement;
 15. Playing pitches within large usable open space.
92. These aspects of the proposal will be demonstrated through the presentation of the Framework Masterplan to the committee. Whilst there are two primary blocks of development within the site, these are interspersed with good sized areas of green space, belts of landscaping and with positive linkages both between these areas and throughout the development. The design approach is, therefore, considered to have been comprehensively considered, with the exception of the indicated location of the sports pitches. Whilst these are logically located to the southern extremity of the site, they are located immediately to the rear of existing residential properties. This element of the scheme would, therefore, require further consideration at the reserved matters

stage which, given the outline nature of the scheme, is the appropriate point at which to look at this matter in detail.

93. However, given the extent of the site, this is not considered to weigh heavily against the development and, overall, it can be determined that the proposal meets the tests set out in the NPPF for providing quality design and also local plan policies dealing specifically with design issues.

Highway Safety and Transport

94. It is clear that the highways impacts of this development are a major concern for the local community and that the proposals have been the subject of significant scrutiny by the Local Highway Authority. The response to the proposal by the adjoining authority, Ipswich Borough Council, also raises concerns in respect of a number of highway/transport related matters. This section of this report will consider a number of elements, including highway capacity, highway safety, parking provision, accessibility and sustainable travel.
95. Paragraph 32 of the NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. This is interpreted as referring to matters of highway capacity and congestion, as opposed to matters of highway safety. The courts have held that paragraph 32 should not be interpreted to mean that anything other than a severe impact on highway safety would be acceptable (*Mayowa-Emmanuel v Royal Borough of Greenwich* [2015] EWHC 4076 (Admin)).
96. Policy T10 of the Mid Suffolk District Local Plan requires vehicular access into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it complies with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.
97. Taking first the matters of accessibility and sustainable travel, there can be little doubt as to the overall sustainability of the location in respect of its accessibility to alternative modes of transport than the car. The site lies adjacent to a prominent bus route with bus stops immediately outside the site, is on a Sustrans cycle route and has a full footpath along the entirety of Old Norwich Road leading back into Ipswich and into Claydon. The site is within ready walking and cycling distance of supermarkets, convenience stores, the recreation ground, schools, the sports and community centre, fast food establishments, industrial parks, recreational parks, Whitton Clinic and other day-to-day services such as hairdressers, bakers and cafes. It therefore accords with the overarching aims of the NPPF to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
98. The proposal seeks to encourage the use of alternative methods of transport and includes a Travel Plan within the submitted documents. This has been reviewed by the LHA, who have requested obligations relating to the submission, approval and implementation of the Travel Plan, provision of residents travel packs, evaluation and support of the Travel Plan, a bond to cover the implementation of the Travel Plan by SCC if the developer fails to deliver the Travel Plan themselves and the subsequent monitoring of the Travel Plan and provision of any mitigation measures if predicted trip rates are exceeded upon occupation of the development.
99. Whilst these obligations seek to deliver the Travel Plan itself and ensure its efficiency, the Concept Masterplan also shows a number of physical features which are relevant to the encouragement of alternative transport methods. Realignment of Old Norwich Road to enable

bus services to travel through the development, including a new bus gate at the northern end of the site, are proposed as is new footpath links from the development onto Old Norwich Road. The LHA have also identified the need for pedestrian and cycle linkage from the northern to southern elements of the site along the western edge of the development, which will be dealt with as part of the reserved matters submission, as a further requirement. All of these factors, when coupled with the Travel Plan, will encourage residents to use alternative transportation modes.

100. It is appropriate to note at this point that the response from the LHA raises some issues with the proposed layout, and as suggested above these will need to be addressed through the submission of detailed schemes in due course. However, it should be borne in mind when reaching a decision on this proposal that matters pertaining to road layouts within the site would be subject to detailed submissions and, in the event that there is no fundamental objection (such as, perhaps, the site not being able to accommodate those changes in any way) then these would be matters to be dealt with at a later stage.
101. In this regard, whilst the LHA have raised concerns over the desirability of a pedestrian and cycle link to the west of the development linking the northern and southern parts of the site, and that the indicative layout would not be conducive to use for buses due to the nature of some of the bends in the layout, these are matters which are considered can be addressed through revisions to the layout at a later stage. They are not, however, matters which are considered to be such that could not be achieved on the site and, therefore, do not weigh heavily against a grant of permission in this instance.
102. It is noted that one of the main factors of concern in respect of both the traffic and transport impacts of this development and in respect of local concerns as to the coalescence of Ipswich and Claydon resulting from this development is the potential for vehicles to travel north out of the development. There are no proposals for this to occur. Primary vehicular access to the site is proposed from Old Norwich Road, which will be realigned into the site. The existing carriageway will be maintained at 9.3 metres wide, reducing to 6.7 metres wide upon entering the site. This is considered appropriate to accommodate a bus route.
103. Two metre wide footways will be provided on both sides. The existing alignment of Old Norwich Road will be reconfigured to provide a priority junction, to serve the existing carriageway and residential properties. As part of the proposals, the existing 30mph speed limit will be extended on Old Norwich Road into the site. Visibility at the proposed priority junction can be achieved at 4.5 x 70 metres to the nearside kerb in both directions, which is considered appropriate for a 30mph speed limit in accordance with guidance set out in Design Manual for Roads and Bridges (DMRB).
104. A secondary access could be provided on Old Norwich Road approximately 150 metres north of Walnut Tree Farm, as shown on the site masterplan. However, there will be no vehicular through route through the development site, with all private vehicles accessing the site from the south. However, an emergency and bus only access is proposed to the north of the site to connect to the existing bus gate on Old Norwich Road. The bus gate will remain as part of the proposals.
105. In this regard, the termination of Old Norwich Road at the bus gate would remain, with no through route into Claydon for vehicles other than buses, cyclists and pedestrians. As detailed above at paragraph 77, it is considered that the existing woodland to the north of the site and the physical constraint upon vehicles wanting to travel from Ipswich to the north results in a separation between this development and Claydon such that it is not reasonable to conclude that coalescence would occur. The development would read as an extension of Whitton towards Claydon, not a joining up of Whitton and Claydon. Sufficient separation exists to ensure that this is the case.

106. Another of the principal issues of concern to the local community, and one which has also been the subject of significant concern for the LHA, is that of the impacts on the junctions of Old Norwich Road with Whitton Church Lane and Bury Road, which lie to the south of the site. Given the physical restriction upon drivers to be able to go north out of the development, pressure would be put on these junctions such that these have been an area of significant focus by the LHA.
107. In turns of the Whitton Church Lane junction, improvements are required to this junction as the current layout encourages vehicles to turn into Whitton Church Lane and the visibility for vehicles existing Whitton Church Lane is poor and will require improvements. The requirement for improvements to these junctions would be site specific improvements required to mitigate the development and are, therefore, to be required as planning obligations in the event that planning permission is granted for this development.
108. In respect of the Bury Road junction, the LHA remain concerned over the potential impacts on this junction but have confirmed that the modelling of the junction's capacity provided by the applicant is robust and that the scheme would deliver traffic movements within the junction's capacity. It is, therefore, necessary to require improvements to this junction as a planning obligation in the event that permission is granted.
109. Overall, the LHA has not objected to the development and recommends a number of conditions relating to the delivery of the site access, construction management, estate road and footway construction and parking and turning provision on the site. As such, having regards to the highway impacts of the scheme, when considered in line with the requirements of paragraphs 21 and 32 of the NPPF it is considered that the proposal complies with the requirements of policy T10 of the local plan and paragraph 32 of the NPPF, in that safe and suitable access for all people can be achieved and that the cumulative effects of this development and others after mitigation would not be severe.

Sustainable Construction/Renewable Energy

110. Whilst the application is made in outline form, the Council's Sustainability Officer has recognised that the application provides opportunities to achieve positive measures to reduce carbon emissions and utilise sustainable technologies in the development. A condition is recommended to achieve this.
111. The applicant has recognised, within their Sustainability Statement, the requirements of Core Strategy policies CS3, CS4 and CS5 (amongst others) which look at reducing contributions to climate change, adapting to climate change and the Mid Suffolk environment. They identify a wide range of principles to be employed in the development to meet the aims of these policies and the NPPF, including that the proposed development will be specified and built to a high standard of construction, commensurate with the applicable national regulations and standards, and which will have regard to the following specific elements:
 - Energy (including insulation standards, space heating, limiting the risk of summer overheating, air tightness, lighting and appliances)
 - Water Consumption
 - Materials Procurement.
112. It is considered that, subject to a condition to secure a detailed energy strategy, the proposal complies with the requisite policy provisions with regards to this matter.

Drainage and Flood Risk

113. The submitted Flood Risk Assessment (FRA) states that the application site lies wholly within fluvial/tidal Flood Zone 1 (low risk) and is at a low risk of flooding from all other sources. It identified no records of historic flooding found in the Strategic Flood Risk Assessment or following an online search for the site or Old Norwich Road.
114. The proposed residential development is considered 'more vulnerable' within the hierarchy set out in the Environment Agency's Flood Risk Vulnerability Classification and so is appropriate within Flood Zone 1. The proposals were found to meet the requirements of the Sequential Test.
115. The FRA recommended that all building FFLs are elevated 150mm above immediately surrounding ground to ensure any design exceedance flows, should they occur, are directed away from any buildings (in line with best practice). The proposed development will also include storm water attenuation in the form of two separate basins. One will serve the south catchment of the site and one for the northern catchment area. Storage is provided for up to a 1 in 100 year event + 40% allowance for climate change. The storm water discharge will be via a new connection to the existing water course to the north of the site.
116. The FRA also notes that due to chalk formations on site discharge of surface water may be possible via infiltration. Infiltration testing in accordance with BRE 365 will need to be carried out to confirm infiltration rates and suitability of this preferred solution. Foul flows from the site will be pumped to the existing Anglian Water foul sewer in the north of the site, which has been shown to have capacity for the sites flows.
117. The Flood and Water team at SCC, as the Lead Local Flood Authority, have engaged with the applicant's drainage consultants following the submission of the application and have advised that they have no objections to the scheme subject to conditions. As such, it has been adequately demonstrated that the site is not at risk of flooding and that appropriate drainage can be achieved on the site.

Agricultural Land Classification

118. Paragraph 112 of the NPPF states that *"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality"*.
119. An Agricultural Land Classification and Soil Resources Report has been submitted in support of the application. The report found that the site is highly variable with more types of limitation than there are types of soil. Droughtiness was found to be prevalent throughout and is the primary limitation on the sandy soils to the south. The soils in the northern field are less droughty, but are more severely limited by other factors, such as stoniness, gradient, and the pattern of variability. The central field is limited mainly by wetness.
120. The report concludes that of the 19ha of site area, 16.7ha was in agricultural use. Of that 16.7ha, only 8% (1.4ha) is Good Quality Grade 3a land. 57% (9.5ha) is Grade 3b and 35% (5.8ha) is Grade 4.
121. In this regard, the application site does not contain any elements of Grade 1 or 2 land, and only a limited (approximately 7%) amount of the site falls in the Best and Most Versatile (B&MV) definition set out in the NPPF.
122. It is your Officers opinion, therefore, that the loss of BMV land in this case is not significant, and would not weigh heavily against the development.

Land Contamination

123. A Ground Conditions Desk Study has been prepared in support of the application. The Study considers the geo-environmental risks and the risk associated with the application site. Based on historic land uses and its current operational use, the Study concluded that the overall risk from land contamination is considered to be low for the current use, and low to moderate for the developed site. The Study also confirmed that the application site is unlikely to be classified as contaminated land under Part 2A of the EPA 1990.
124. The Council's Contaminated Land Officer has confirmed that they are satisfied with the submitted information and that there are no further requirements with respect to Land Contamination.

Ecology and Biodiversity

125. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) requires all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." For a Local Planning Authority to comply with regulation 9(5) it must "engage" with the provisions of the Habitats Directive. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal, as it states that when determining planning applications, consideration must be given to 6 principles. Two of those principles are particularly relevant to the consideration of this proposal, being;
126. If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused. Opportunities to integrate biodiversity in and around developments should be supported.
127. An Ecological Appraisal was submitted with the application which identified that there the impact to badgers or any other protected priority or rare species was very low. Further ecological surveys and mitigation were considered unnecessary. However, impact avoidance measures for birds, bats, herpetofauna, badgers and other mammals are recommended to minimise any residual risk of harm or impact to species. Biodiversity enhancement recommendations are also included within the assessment.
128. The Council's Ecology Consultant raises no objection to the development, stating the Assessment provides sufficient survey and assessment for the likely impacts of the development on Protected and Priority Species. The ecological mitigation measures and reasonable enhancement measures should be secured by conditions on any consent. The conditions recommended by the Council's Ecology Consultant shall be included with any permission
129. An Ecological Assessment has been undertaken to inform a Report of Ecology and Protected Species Surveys. The report notes that neither the site itself, nor any adjoining site, is subject to a statutory nature conservation designation. The nearest statutory nature site is Bramford Meadows Local Nature Reserve, which is c1.4km south west of the site. There are also no non-statutory nature conservation designations affecting the site itself, nor any adjoining site.
130. This report has been considered by the Council's Ecology Consultants, who has raised no objection to the proposal subject to securing a proportionate financial contribution towards visitor management measures for the Stour & Orwell Estuaries SPA/Ramsar, and conditions to secure ecological mitigation and enhancements.
131. As such, notwithstanding local concerns as to the extent of wildlife and ecology interests on this site, the proposal has demonstrated that suitable mitigation and enhancement can be achieved through the design process such that this would not weigh against the development.

Residential Amenity

132. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17, where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.
133. The impacts on existing and future residents are a key factor in the consideration of this proposal, given the proximity of the site to the A14. The Councils' Environmental Protection Officer (EPO) has raised significant concerns over the proximity of some of the units to the noise generated from the A14 and the potential effects of this on future occupiers. Mechanical ventilation, as proposed by the applicant, is deemed unsatisfactory and would not, in any event, overcome the potential impacts on the external amenity spaces of properties nearest the western boundary of the site, in particular.
134. The NPPF and PPG recommend that planning decisions should be avoided where the perception of noise is noticeable and disruptive and such that it has a significant impact. However, neither the NPPF nor the Noise Policy Statement for England (NPSE) expects noise to be considered in isolation to other social, economic and environmental benefits. PPG also states: "*The planning process should avoid this (significant adverse effects) occurring, by using appropriate mitigation...*" and "*such decisions must be made taking into account the economic and social benefit of the activity...*". In light of this, the balancing of the likely harmful effects to the living conditions of some of the new properties is carried out in the overall balancing of the material considerations set out in the 'Planning Balance' section of this report.
135. In circumstances similar to this, such as at the Wolsey Grange development at Sproughton, mitigation proposals included the provision of acoustic boundary fencing to the site boundaries with main roads. The proposed mitigation in this case does not, currently, include such a proposal. The Council's EPO has raised significant concerns over the use of mechanical ventilation within dwellings and it is noted this view has been consistent across other sites potentially subjected to road generated noise.
136. As such, whilst the Noise Assessment submitted with the application identified that mechanical ventilation may be provided in circumstances where dwellings were close to the road, it has been indicated that this may not be an acceptable solution. Instead, it is recommended that, in the event that planning permission is granted, precise details of a noise attenuation scheme to ensure suitable living conditions for future inhabitants is provided concurrent with any reserved matters submissions (whether that is provided in either a phased arrangement or as a comprehensive proposal across the entirety of the site). Such attenuation would need to consider the formal arrangement and orientation of living spaces within dwellings, private amenity spaces and any physical barrier that is required to be provided to the site boundaries and how that may be incorporated into any detailed landscaping proposal.
137. As such, at the current time it has not been demonstrated that the amenity of future occupants can be provided at a level that would not give rise to annoyance and disturbance from noise.
138. Furthermore, the scheme provides for the development of playing pitches close to the existing residential properties on Old Norwich Road. This element of the scheme is considered to be unneighbourly and poorly developed and would require further development at the detailed stage. However, the site is of a size such that such changes could be accommodated within the

development. Indeed, it may be possible to vary the nature of this provision such that it would not be formal sports pitches located in this area but an alternative recreational provision.

139. In conclusion, therefore, the proposal gives rise to a number of concerns as to the resultant amenity of future occupants and to the location of noise-generating development adjacent to existing residences. As these are environmental matters, whilst the proposal performs well in most of the other matters considered above, in this regard the scheme currently fails to demonstrate that residential amenity has been suitably addressed and therefore there is some environmental harm which arises. This will be weighed in the overall Planning Balance.

Other Matters

Delivery of Infrastructure/Planning Obligations and CIL

140. The proposal gives rise to a number of infrastructure requirements which would require to be secured through a Section 106 agreement, through onsite delivery or through future CIL bids. This section considers these requirements and their impacts on the viability of the scheme.
141. Following initial consultation on the proposal, the SCC Development Contributions Manager set out requirements for matters such as education, waste and libraries in a letter dated 20th June 2017. However, since that time, the issue of primary school provision has moved forward considerably, and the Development Contributions Manager (DCM) wrote again on 24th January 2018 to set out the revised position. As this is a key issue in the consideration of this proposal, for reasons which will become clear, this matter will be addressed first.
142. As the DCM states, ideally, the County Council would like to see a plan-led approach to housing growth in the Claydon locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including primary school provision. To not consider and address the cumulative impacts of growth will result in a sub-optimal outcome for education provision in the Claydon locality – this would be contrary to the principles of delivering sustainable development, which is the golden thread running through the NPPF. There are numerous ‘hooks’ within the NPPF which support the County Council’s position.
143. This position is supported by your Officers, who recognise the difficulties in reaching decisions based on ‘point in time’ decision making and the continued absence of a clear Infrastructure Plan that would be material to the decision-making process. However, that process is moving forward and will form part of the New Joint Local Plan once completed and adopted.
144. In the meantime, the District Council has a duty to determine planning applications in accordance with the development plan in force at the time, taking account of material considerations (such as the NPPF) which direct decision-takers where plans are not up-to-date or where, for example, development plan policies pull in differing directions.
145. The Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. The DCM identifies that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District’s planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

146. In paragraph 187 of the NPPF it states *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”* The County Council’s positive solution to addressing the unacceptable impacts of the proposed development on education infrastructure is to secure a planning obligation to mitigate the harm arising in respect of primary education provision.
147. And in paragraph 17 of the NPPF it states *“Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both planmaking and decision-taking.”* One of these 12 principles say that planning should *“take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”* The strategy of delivering a new primary school in the Claydon locality to meet local needs ensures that housing growth, including this proposed development, is sustainable in respect of the NPPF and local plan policies.
148. The DCM draws attention to a current planning application in Barham & Claydon (under reference 1856/17) which is being promoted by Pigeon Investment Management. That proposal is for outline permission for up to 300 homes and includes a reserved site for a new pre-school and a new primary school. This position reflects the strategic requirement for a new primary school, but has not yet been determined and remains under active consideration by the LPA.
149. The DCM has looked at the potential cumulative impact of developments in the locality with a view to establishing the wider (than this development) primary school provision needs. He identifies a total of at least 1686 dwellings resulting from this development and those which are either proposed, as in the scheme referred to at Barham, or previously approved and which stretch to areas such as Great Blakenham and Bramford. Based on the methodology that SCC employ to account for primary school aged children in new developments, they equate that this level of development would generate the need for a 420 place primary school.
150. The Claydon Primary School expansion planning application received a resolution to grant planning permission by SCC’s Development and Regulation Committee at its meeting on 16 January 2018. This is subject to the prior completion of a planning obligation and the imposition of planning conditions. The aim is to complete the project for the expansion of the school up to 525 places by September 2019. However, it is noted that this expansion project will not deal with pupils arising from this proposed development. The entry in the County Council’s Budget Book is for a ‘contractually committed scheme’ which is a project for the expansion of Claydon Primary School up to 525 places. As such, this development would need to make provision towards the delivery of a new primary school.
151. In respect of the developer contributions sought to mitigate the harm arising from this proposed scheme the following sets out the County Council’s position:
- a) Build cost contribution (BCIS linked) of £1,297,891 (2017/18 costs) to be payable in 4 equal instalments – triggers being 25% prior to 50th, 125th, 200th and 250th dwelling occupations. To be secured by way of a planning obligation.
 - b) Land contribution of £92,983 to be payable prior to 50th dwelling occupation. To be secured by way of a planning obligation.
 - c) Use of the developer contributions – to be used towards the site acquisition and build costs of a new primary school in the Claydon locality to serve the new residents of the proposed development.
 - d) The developer contributions will be secured for a period of up to 10 years and returned if not spent.

e) A clause included in the planning obligation that will enable the full developer contributions to fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development.

f) A clause included in the planning obligation that will enable the full or a relative proportion of developer contributions to fall away, or be returned in full, if in the interim the existing Claydon Primary School is expanded to 630 places (three forms of entry).

152. The DCM has confirmed that if these contributions are secured, then any objections the County Council has to the proposed development in respect of primary education provision will fall away as adequate mitigation will be secured. Therefore, any grant of planning permission for this development will need to include the above contributions and clauses.
153. Turning to secondary school provision, SCC confirm that there are no surplus places available at the catchment secondary schools. They confirm, therefore, that CIL funding of at least £1,305,026 (2017/18 costs) will be sought.
154. In terms of education, this leaves the matter of pre-school provision where it is further acknowledged that there is a surplus of places predicted in September 2017 in the Claydon and Barham ward. On this basis no CIL funds will be sought for this proposed development to respond to pre-school provision needs.
155. In respect of libraries, the DCM sets out the requirements which will, again, be sought through future CIL bids if the development is taken forward.
156. Paragraphs 42-43 of the NPPF recognise that advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services, and that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.
157. The provision of high speed broadband to the development would enable home-working, recognised as having benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.
158. SCC recommend that, 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. As such, any permission granted should include a condition to secure high-speed broadband as part of the development.
159. The matter of health provision and access to health services has been the subject of detailed discussion and is a matter that would be subject to a bid for CIL funding to mitigate the impacts of the development. Whilst NHS England, in their consultation response, had indicated that they required the contribution to be secured through a 106 agreement, this is not possible and is a matter to be addressed through CIL. NHS England are now aware of this and are to contact the Council's Infrastructure Team to discuss the process of securing the necessary funding at the appropriate time.

160. In light of all of the above, it is apparent that the infrastructure provisions to mitigate the impacts of the development can be secured through a combination of planning obligations and CIL provision.

Prematurity

161. The Planning Practice Guidance confirms that, in the context of the NPPF, arguments that an application is premature is unlikely to justify a refusal of planning permission, other than where it is clear that the adverse impacts of granting permission would significantly outweigh the benefits, taking the policies in the NPPF and any other material considerations into account. It continues by stating that where planning permission is to be refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of planning permission for the development concerned would prejudice the outcome of the plan-making process.

162. The Joint Local Plan is at an early stage of development and can be given limited weight in the decision-making process. The development of this site, given the Council's absence of a deliverable supply of housing land, is not considered to prejudice the emerging Local Plan, which is still some way off being delivered. The Plan can, if necessary, respond to a grant of permission on this site should such a decision be made.

163. As such, it is not considered that there are grounds to refuse permission in this case on the basis of prematurity.

Crime and Safety

164. The comments of the Designing Out Crime Officer are noted and provide some positive recommendations as to steps that can be taken through the detailed design of the proposal such that would aid the safety of occupants of the development.

165. As such, it is considered that the detailed elements of the proposal can reflect the principles set out at paragraphs 58 and 69 of the NPPF, which seeks to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

166. Granting this development will result in the following financial benefits:

- New Homes Bonus
- Council Tax
- CIL

These benefits are noted, however have not been held as material in reaching this recommendation.

PART FOUR – CONCLUSION

Planning Balance

167. This application brings about a number of issues which require careful attention in reaching a decision upon this proposal. What follows, therefore, is a balancing of those issues in light of the assessment carried out within the preceding paragraphs of this report.
168. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The consideration is, therefore, whether the development accords with the development plan and, if not, whether there are material considerations that would indicate a decision should be taken contrary to the development plan.
169. The development plan includes the Core Strategy 2008, the Core Strategy Focused Review 2012, and saved policies in the Mid Suffolk Local Plan 1998.
170. In light of this application relating to a proposal for new housing, a further important consideration in determining this application is that Mid Suffolk does not currently have a five-year supply of deliverable housing sites. Paragraph 47 of the NPPF requires LPAs to identify a 5 year supply of specific deliverable housing sites. Paragraph 49 of the NPPF states that 'relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'.
171. Paragraph 14 of the NPPF states;

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For decision-taking this means:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*

– any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
– specific policies in this Framework indicate development should be restricted”.

172. As such, the effect of paragraphs 47, 49 and 14 are that;
- the local authority should be able to identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements;
 - that where such a supply cannot be demonstrated, policies for the supply of housing should not be considered up-to-date, and;
 - where policies are not up-to-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole or where specific policies in this

Framework indicate development should be restricted. Policy CS1 sets out a similar approach where relevant Core Strategy policies are out-of-date.

173. As set out at paragraph 38 above, the Supreme Court in May 2017 has clarified the position with regards to 'policies for the supply of housing' and how that is to be considered. Officers note that the judgement makes it clear that the meaning of that expression is not the real issue, and that the absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF, and that in applying the 'tilted balance' required by this paragraph, it is necessary to consider the weight to attach to all of the relevant development plan policies.
174. It is considered that policies CS1, CS2, FC02 and H07 are policies for the supply of housing. It is, therefore, considered that paragraph 14 of the NPPF is engaged with regards to this proposal.
175. However, prior to considering the presumption in favour of sustainable development identified by paragraph 14, it is necessary to consider whether there are specific policies in the Framework that indicate development should be restricted. The footnote to this part of the NPPF identifies, amongst other things, policies relating to heritage assets, as being those which may indicate development should be refused.
176. In consequence of the Council's heritage assessment, the NPPF (para 14, footnote 9 and paragraph 134) and the statutory duty imposed by section 66(1) of the Listed Buildings Act are to be taken into account in the consideration of the policy context.
177. As set out in the judgement on Forest of Dean Council & the Secretary of State for Local Government v Gladman Developments Limited (2016) EWHC 421 (Admin) and at the Court of Appeal in its decision on Barnwell Manor Wind Energy Ltd v East Northants DC [2014] EWCA Civ. 137 when an authority finds that a proposed development would harm the setting of a listed building or the character and appearance of a conservation area, it must give that harm considerable importance and that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.
178. The NPPF (para. 134) states that 'where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal including securing optimal viable use'.
179. In this instance, the public benefits of the proposal are summarised as including the following:-
 - Through the delivery of 315 dwellings of an appropriate housing mix, including the delivery of 35% (111) affordable homes, the proposal would have inherent social and economic benefits and would meet housing needs and delivery of growth;
 - Provision of Sports Pitches
 - Highways Improvements
 - Contributions to improve infrastructure
180. These public benefits are sufficient to outweigh the less than substantial harm to heritage assets identified, even when considerable importance and weight is given to the desirability of preserving those assets.
181. Officers have therefore applied the balance required by paragraph 134 of the NPPF, having special regard to the desirability of preserving the setting of the listed building as required by section 66 of the Listed Buildings Act, and given the harm considerable importance and weight. The outcome of this balancing exercise is that those public benefits identified outweigh the less

than substantial harm (which is to an extremely low extent), even when that harm is given considerable importance and weight.

182. In this respect, where paragraph 14 of the NPPF provides a presumption in favour of sustainable development, it is necessary to consider whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in this Framework indicate development should be restricted. The public benefits of the scheme have been weighed against the harm to heritage assets and have been found to outweigh that harm, thereby satisfying the test in paragraph 134.
183. As such, it can be concluded that there are not specific policies in the Framework that indicate that development should be restricted and, therefore, paragraph 14 can be engaged.
184. The Council does not have a five year housing land supply and considers therefore that limited weight should be attached to policies CS1, CS2, FC2, and H07. Whilst it is considered that the proposal does not strictly comply with these policies, any conflicts with these policies should be afforded limited weight.
185. Whilst it has been identified that the proposal does give rise to negative impacts which weigh against the proposal, such as the potential impacts on amenity to future residents which have not been demonstrated to be sufficiently mitigated, and the impact on heritage assets; it is considered that the benefits that the scheme brings through the provision of new housing, the securing of 111 (35%) affordable properties, and the contributions towards local infrastructure outweigh the negative elements.
186. Therefore, whilst the proposal is not in accordance with the development plan as a whole, it is considered that the adverse impacts from the proposed development (including the identified harm to heritage assets or otherwise) do not significantly and demonstrably outweigh the benefits of the development explained in this report. Furthermore, whilst the restrictions in footnote 9 of the NPPF include impacts on heritage assets, for the reasons explained above none of these policies indicate that development should be restricted.
187. As such, the proposal is considered to be sustainable development, in accordance with the three dimensions of sustainable development set out in the NPPF, and a recommendation of approval is therefore made. Whilst such a decision would not be in accordance with the development plan, viewed as a whole, it is an outcome that is envisaged by policies FC1 and FC1.1 of the Focused Review where the 'tilted balance' and the presumption in favour of sustainable development are engaged.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

188. When determining planning applications, The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising. In this instance the applicant has worked to address problems and has sought to resolve these wherever possible.

Identification of any Legal Implications of the decision

189. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following have been considered in respect of the proposed development.

- Human Rights Act 1998
- The Equalities Act 2010
- Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
- Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
- The Conservation of Habitats and Species Regulations 2010
- Localism Act
- Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

Subject to the carrying out of the intrusive archaeological investigation to the satisfaction of the Archaeological Service, that authority be delegated to the Corporate Manager – Growth and Sustainable Planning to grant planning permission subject to the prior completion of a Section 106 or Undertaking on terms to their satisfaction to secure the following heads of terms:

- Affordable Housing (111 dwellings at a mix and tenure to be agreed with the Council's Professional Lead for Strategic Housing)
- New primary school build cost contribution (BCIS linked) of £1,297,891 to be payable in 4 equal instalments – triggers being 25% prior to 50th, 125th, 200th and 250th dwelling occupations.
- New primary school land contribution of £92,983 to be payable prior to 50th dwelling occupation.
- Clause requiring the primary school build and land contribution costs to be used towards the site acquisition and build costs of a new primary school in the Claydon locality to serve the new residents of the proposed development, and to be secured for up to 10 years and returned if not spent.
- Clause included that the contributions pertaining to the primary school build and land costs will fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development.
- Clause included that will enable the contributions pertaining to the primary school build and land costs to fall away, or be returned in full, if in the interim the existing Claydon Primary School is expanded to 630 places (three forms of entry).
- Travel Plan Evaluation and Support Contribution
- Travel Plan Implementation Bond, or cash deposit - £161,035
- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved travel pack to each resident on occupation
- Submission, approval and full implementation of a Full Travel Plan
- Travel Plan Monitoring for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied
- Highways junction improvements at Whitton Church Road and Bury Road junctions
- Contribution of £10,000 for Traffic Regulation Order ahead of the opening of the Bus Gate
- RAMS Contribution

and that such permission be subject to the conditions including as set out below:

- Standard time limit

- Submission of reserved matters
- As agreed with the Environmental Protection Team relating to noise, but including detailed scheme of noise attenuation concurrent with any reserved matters submission
- Landscaping scheme concurrent with reserved matters and including tree protection measures
- Implementation of landscaping scheme
- Secure and implement sustainability and energy strategy
- As required by the Archaeological Service following conclusion of the intrusive groundworks.
- Secure provision of fire hydrants
- Concurrent with reserved matters to submit foul and surface water drainage strategy
- Approved drainage scheme to be implemented in full as approved
- Concurrent with reserved matters details of the implementation, management, and maintenance of the drainage scheme shall be submitted and agreed.
- SUDs details shall be submitted and approved for inclusion in Lead Local Flood Authority's Flood Risk Asset Register.
- Details of construction surface water management shall be submitted and agreed. Development implemented in accordance with approved details.
- Implement Ecological Mitigation measures
- Secure and implement Reptile Method Statement
- Concurrent with Reserved Matters to secure biodiversity enhancement plan
- Lighting Design Scheme to be agreed and implemented
- Agree and implement construction of carriageways and footways
- Agree and implement parking, cycling, and manoeuvring areas
- Provide and maintain visibility splays
- Construction Management Plan
- Details of materials
- Details and position of footway
- Provision of high-speed broadband
- Provision of a waste management scheme, including provision of bin presentation and storage points.

3) That in the event of the Planning Obligation referred to in Resolution (1) above not being secured that the Corporate Manager- Planning for Growth be authorised to refuse planning permission on appropriate grounds.