

WOOLPIT PARISH COUNCIL

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

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

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

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

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

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

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

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

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

Our Ref: W574/001/ROW814/16

For The Attention of: John Pateman-Gee

Public Rights of Way Response

Thank you for your consultation concerning the above application.

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

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

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

Regards

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

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

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

M3 : 186593

4489/16/OUT. EH - Land Contamination.

**Land north of, Old Stowmarket Road, Woolpit, BURY ST EDMUNDS, Suffolk.
Application for Outline Planning Permission with all matters reserved, except
for Access, for the erection of up to 79 dwellings**

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

Regards

Nathan

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

From: Iain Farquharson
Sent: 18 November 2016 15:47
To: Planning Admin
Subject: M3 186587 Consultation on Planning Application 4489/16

Dear Sir/Madam

The documents submitted do not address sustainability issues ie construction materials, sources of heating, renewable energy generation, design and orientation or reduction in the reliance of electricity consumption, water use etc have not been mentioned. Also the application does not offer any 3rd party accreditation for the environmental credentials

We recognise this is an outline application but we still require some forethought into this area.

The application does not provide sufficient information to address council policy CS3 Reduce Contributions to Climate Change, therefore we recommend refusal until information on this topic is made available for consideration.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

 01449 724878

 iain.farquharson@baberghmidsuffolk.gov.uk

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

WK/186591

Dear John

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

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

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

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

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

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

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

Regards.

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

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Resource Management
Bury Resource Centre
Hollow Road
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IP32 7AY

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

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

Our Ref: 2016_4489
Date: 29 November 2016

For the Attention of John Pateman-Gee

Dear Mr Isbell

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

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

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

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

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

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

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

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

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team



Planning Applications – Suggested Informative Statements and Conditions Report

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

Prepared by: Mark Rhodes

Date: 22 December 2016

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

ASSETS

Section 1 – Assets Affected

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

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

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

Section 4 – Surface Water Disposal

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

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

Section 5 – Trade Effluent

- 5.1 Not applicable
-

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

Application ref: 4489/16
Our ref: 201377

Dear Sir/Madam,

Natural England has no comments to make on this application.

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

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

Yours faithfully,

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

tel 0300 060 3900
email consultations@naturalengland.org.uk

www.gov.uk/natural-england

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

05/12/2016

Dear John,

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

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

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

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

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

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

Yours sincerely

Jill Crighton
Conservation Planner

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

John

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

Regards

David

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

Consultation Response Pro forma

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

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

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	changes? Please ensure any requests are proportionate	
7	Recommended conditions	

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



Historic England

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

Direct Dial: 01223 582751

Our ref: P00537565

04 December 2016

Dear Mr Pateman-Gee

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

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

Summary

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

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

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

Historic England Advice

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



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

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

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



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

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

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

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



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

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

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

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



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

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

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



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

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

Recommendation

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

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

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

Yours sincerely

Nick Carter

Assistant Inspector of Ancient Monuments
E-mail: nick.carter@HistoricEngland.org.uk

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



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Suffolk Fire and Rescue Service

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

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

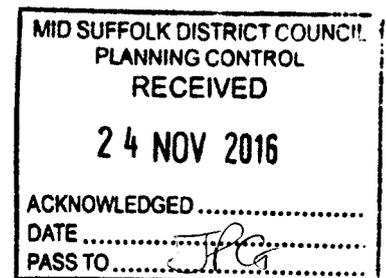
Your Ref:
 Our Ref: FS/F310958
 Enquiries to: Angela Kempen
 Direct Line: 01473 260588
 E-mail: Fire.BusinessSupport@suffolk.gov.uk
 Web Address: <http://www.suffolk.gov.uk>

Date: 21/11/2016

Dear Sirs

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

I refer to the above application.



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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Continued/

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

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

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

Yours faithfully



Mrs A Kempen
Water Officer

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

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

Email address: kerryharding@nhs.net

Telephone Number – 0113 824 9111

Your Ref: 16/4386

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

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

07 December 2016

Dear Sirs,

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

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

Background

2. The proposal comprises a development of 138 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is 1 GP practice within a 2km catchment (or closest to) the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

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

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

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Mount Farm Surgery	12,244	768.40	11,206	-71.19
Total	12,244	768.40	11,206	-71.19

Notes:

1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
 2. Current Net Internal Area occupied by the Practice.
 3. Based on 120m² per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
 4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment, extension, or relocation at Mount Farm Surgery would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to reconfigure the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

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

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

Yours faithfully

Kerry Harding
Estates Advisor

Your ref: 4489/16
Our ref: Woolpit – Land north of Old
Stowmarket Road 00044369
Date: 01 March 2018
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Mr John Pateman-Gee,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Endeavour House,
8 Russell Road,
Ipswich, Suffolk,
IP1 2BX

Dear John,

Woolpit: Land north of Old Stowmarket Road – developer contributions

I refer to the outline planning application (with all matters reserved, except for access), for the erection of up to 79 dwellings. This letter updates my previous letter sent on 28 July 2017 which was time limited to six months. As this planning application will now be determined outside of this six months' period, the County Council will need to fully review matters.

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

This consultation response deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Woolpit. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

The District Council will also need to consider the s106 pooling limitations because if

SCC accept individual contributions from a number of sites then there is a strong likelihood that the limit of five for any one infrastructure project, imposed by CIL Regulation 123, would be exceeded, leading to a future shortfall in the funding of the overall projects

The requirements being sought here would be requested through S106A contributions as they fall outside of the adopted 123 list. The details of specific S106A contribution requirements related to the proposed scheme are set out below:

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

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

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

Pupil yields

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

Primary School

The DfE publishes Area Guidelines (Building Bulletin 103) for schools which define the minimum areas of school buildings, playing fields, site etc. Woolpit Primary Academy is on a very small and constrained site with no possibility of expanding its boundary unless further land was acquired. It has a capacity of

210 places (1 form of entry) so according to the guidelines its minimum site area (including playing fields) should be 11,220 sq m. It has a site area of 11,973 sqm which excludes an early years setting. It is therefore at the optimum site area for a school of this capacity. Because of the unconventional layout of the site, it is not possible to add permanent accommodation to the school and no money will be spent on any permanent accommodation. However schools can take on extra pupils arising as a “bulge” by providing temporary classrooms. This might happen if there is a sudden spike in the local population, or as in this case, due to new housing developments providing it is only temporary until permanent places are provided elsewhere like a new school.

The interim pupil forecasts for Woolpit Primary Academy show by 2021 the numbers are forecast to be 180 while the school’s 95% capacity is 200. Hence there will be 20 spare places at the school, i.e. sufficient places for pupils generated from 80 new houses. The existing Primary School cannot be expanded within its current site.

SCC forecasts show that there will not enough surplus places available at the catchment primary school to accommodate the pupils anticipated to arise from the proposed development when taking into account the resolved to grant planning permission.

Primary pupils mitigation strategy

For many compelling reasons including improving education attainment, community cohesion and sustainability the highly preferred outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Woolpit. Where pupil bulges are anticipated the County Council will consider the provision of temporary classrooms but such an approach is only viewed as an interim measure if the longer term pupil forecasts indicate the need for permanent provision (by way of school expansion or a new school).

A feasibility study has confirmed that the existing school cannot be expanded within its current site, but a second study has looked at how the school could expand if additional land was acquired to the north of the school site. If expansion is possible this would fall under the District’s CIL funding. **As the expansion proposal has not been confirmed, the current approach is for a new primary school for the village with proportionate land and build costs secured by section 106 contributions. Should the expansion be confirmed the obligation in the s106 agreement will cease or be returned.**

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

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

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

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 79 dwellings it is calculated that 20 primary age pupils will arise
- Therefore 20 pupils x £16,429 per place = **£328,580 (2017/18 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £741,316 for a 3 hectare site and equates to £1,765 per pupil place. For the proposed development, this equates to a proportionate land contribution of 20 places x £1,765 per place = **£35,300.**

*Total primary school 106 contribution - £328,580 + £35,300 = **£363,880**
 £363,880 / 79 Dwellings = **£4,606 per dwelling***

N.b. Reason for higher contribution = previous response credited 6 places of the overall surplus places to this scheme but this approach was not taken forward by the District Council.

At present no land has been identified for education use within Woolpit, but SCC

will work closely with Mid Suffolk DC to identify a site of 3 ha. Even though there is currently no identified new school site in terms of the CIL regulations, the 'project' required to support significant levels of developer led growth is the need for a new primary school.

Secondary Schools

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

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

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare. This new challenge has increased the assumptions on the overall need for full-time equivalent (FTE) places.

This development is the Woolpit ward where the only provider is Woolpit Arc. There is a predicted deficit of 24 places. This proposed scheme would result in approximately 8 FTE pre-school places arising. Based on the expected scale of development in Woolpit, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 8 FTE places of the total 30 who would be accommodated within the new setting, could be calculated as follows (costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 30 place setting
- £500,000/30 early years pupils = £16,666 per place
- From 79 dwellings there is the need for 8 additional places
- Therefore 8 pupils x £16,666 per place = **£133,328 (2017/18 costs)**

A new early years setting in the village would be required even if a new primary school is not delivered.

N.b. Higher place costs due to higher ration of 2-4 year olds per house (0.15 yield), and a higher number of children who are eligible for 30 hours a week free childcare than previously calculated.

- 3. Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be co-ordinated by Sam Harvey/Christopher Fish of Transport Strategy, Strategic Development, SCC.

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

- 4. 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.

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

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

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

Yours sincerely,

P J Freer

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

cc Neil McManus, SCC
Sarah Hamond, SCC
Chairman – Woolpit Parish Council
Christine Thurlow, MSDC
Chris Fish, SCC

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

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

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

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

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

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

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

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

Your Ref: MS/4489/16
Our Ref: 570\CON\3840\16
Date: 6 June 2017
Highways Enquiries to: christopher.fish@suffolk.gov.uk



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

Email: planningadmin@baberghmidsuffolk.gov.uk

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

For the Attention of: Mr J. Pateman-Gee

Dear John,

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4489/16

PROPOSAL: Application for Outline Planning Permission with all matters reserved, except for Access, for the erection of up to 79 dwellings

LOCATION: Land North Of, Old Stowmarket Road, Woolpit, IP30 9QS

ROAD CLASS: U

Notice is hereby given that the County Council as Highway Authority does not object to the proposal subject to the completion of a S106 Planning Obligation to its satisfaction and the imposition of the conditions shown below on any permission granted to it:

1. Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved construction management plan. The Construction Management Plan shall include the following matters:
 - a) parking and turning for vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) ~~piling techniques~~
 - d) storage of plant and materials
 - e) programme of works (including measures for traffic management and operating hours)
 - f) provision of boundary hoarding and lighting
 - g) ~~protection of important trees, hedgerows and other natural features~~
 - h) ~~protection of the aquatic environment in terms of water quantity and quality~~
 - i) details of proposed means of dust suppression and noise mitigation
 - j) details of measures to prevent mud from vehicles leaving the site during construction
 - k) haul routes for construction traffic on the highway network and
 - l) monitoring and review mechanisms.

~~No works in respect of the construction of the development hereby permitted and no deliveries to the site during construction shall be undertaken at the following times;~~

~~Outside the hours of 0800 - 1800 on Mondays to Fridays (inclusive)~~

~~Outside the hours of 0800 - 1300 on Saturdays~~

~~On Sundays and on public holidays~~

Reason: In the interests of highway safety ~~residential amenity and~~ to ensure compliance with the Local Plan.

Note: the struck through elements of the above condition aren't considered necessary or in deed acceptable by the highway authority but may be relevant for other reasons.

2. Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.
Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.
3. Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway and new roads. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.
Reason: To prevent hazards caused by flowing water or ice on the highway or new roads that the public will have access to. This is necessary to ensure adequate drainage measures can and are installed.
4. Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, street lighting, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.
Reason: To ensure that roads/footways are constructed to an acceptable standard.
5. Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including secure cycle storage and electric vehicle charging infrastructure shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.
Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety and further to National Planning Policy Framework paragraph 35.
6. Condition: Prior to the commencement of any part of the development, details of the proposed tree planting and landscaping including root management measures shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.
Reason: To ensure that visibility splays and estate roads remain unobstructed by proposed planting in the interests of highway safety; to ensure new trees are not planted too close to carriageways to be lawfully replaced if they become highways and to prevent damage to the roads.
7. Condition: The new estate road junction shown on drawing 1687-02 Rev. A with Old Stowmarket Road inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials.
Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.
Reason: To ensure a safe access to the site is provided before other works and maintained thereafter and to facilitate off street parking for site workers in the interests of highway safety.
8. Condition: Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised travel planning and a multi-modal travel voucher. Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). The RTP shall thereafter be kept up-to-date until the final dwelling is occupied.
Reason: In the interest of sustainable development

9. Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.
Reason: To ensure that satisfactory access is provided for the safety of residents and the public.
10. Condition: No dwelling shall be occupied before the footway on the north side of Old Stowmarket Road between the access and Heath Road has been widened to a minimum width of 2.0 metres in accordance with details that shall previously been submitted to and approved in writing by the Local Planning Authority.
Reason: To promote walking as a mode of sustainable transport.
11. NOTE: The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing as necessary.

S106 Obligation:

12. Prior to occupation of the 20th dwelling a scheme of traffic calming, walking and cycling improvements on Heath Road including; a pedestrian crossing facility; a footway / cycle track link between Old Stowmarket Road and Rectory Road; a footway widening scheme south of Mill Lane; and dropped kerbs for pedestrians at the junctions of Steeles Road and Mill Lane.
13. Prior to first occupation replacement bus stops with raised easy access kerbs and shelters shall be provided on Heath Road (C437) near to the site.

Comment:

14. Pedestrian desire lines from the site would be to the village centre via The Street; to the primary school and medical centre south along Heath Road; and north to the recreation ground and possibly Elmswell. In the interests of sustainable transport and safety improvements are recommended that would meet the statutory tests.
15. The footway shown on MTC drawing 1687-02 Rev. A (Appendix 5 of the Transport Statement) proposes the footway along Old Stowmarket Road between the access and Heath Road is widened to 1.8m. Manual for Streets recommends that footways should be a minimum 2.0m; this would be a small extra cost to provide an additional 200mm width.
16. Access through the proposed development south of Old Stowmarket Road and the medical centre would reduce demand for pedestrians to walk along part of Heath Road south of the site, however, if this route is not made available the development would result in additional pedestrians, notably young children, walking along Heath Road to the primary school and medical centre. Improvements to the footway provision for approximately 35m south of Mill Lane where it is very narrow are needed. This would require a small road narrowing scheme. New pedestrian ramps at the junctions of Mill Lane and Steeles Road with Heath Road should also be provided. It is suggested that these improvements are secured by planning obligation but may be delivered by the developer with a S278 agreement with this authority.
17. To further mitigate the cumulative impact of the proposal, it is recommended that a footway/ cycle track is provided from Old Stowmarket Road north along Heath Road to Rectory Road to provide a sustainable transport link to the recreation ground, potential future development north of Woolpit and part of a link to amenities in Elmswell. Shared footway/ cycle tracks should be at least 3m and a minimum 3.5m wide alongside busy roads with HGVs. The contribution for this is estimated at £40,000 but may also be delivered by the developer with a S278 agreement with this authority at a lower cost than this potentially.
18. There is a footway along The Street to the village centre. There is less need for this to be improved but there is a need to assist pedestrians to cross Heath Road safely. The proposal includes a raised

Zebra crossing on Heath Road to the north of The Street if the mini-roundabouts proposed by application MS/1636/16 are not completed beforehand. The crossing would be away from the desire line to the south for plots 1-14 making it less likely to be used. An informal path across the public open space would likely be created. A stage 1 road safety audit hasn't been submitted to consider with respect to this crossing; however, it is not anticipated that there will be any unmanageable impediments to delivering an acceptable facility (not necessarily that shown on drawing 1687-02 Rev. A). As for the footway/ cycle track above the County Council would suggest this is secured by a s106 obligation but delivered by the developer under a S278 agreement.

19. The Highway Authority's response to MS/1636/16 concluded that, '*further amendments to the design of the proposed double mini-roundabout are required but they can be provided within the limits of the highway, therefore a S106 obligation is agreeable.*' It is noted that the TA for that proposal showed that the priority junction with Heath Road should not have exceeded theoretical traffic capacity. Neither should the mini-roundabout proposal, which would also have the benefit of reducing vehicles speeds, benefiting pedestrians significantly. It is reasonable for the TA supporting the current proposal to conclude that the modest increase in vehicular trips generated by the current proposal does not warrant the review of this.
20. The above response also stated, '*In the long term, a full-size roundabout would be the County Council's preferred arrangement but this would require land outside of the applicant's control and is not considered necessary for this scheme alone.*' The addition of the traffic arising from the proposal should not warrant the capacity increase of a full-size roundabout as well but the previous statement remains true. The land required is within the control of this applicant, albeit within land subject to application MS/4491/16.

Bus access

21. It is recommended that replacement bus stops with raised easy access kerbs and shelters (£7000 each inc. base) are provided on Heath Road (C437) north of The St. This would reduce the need to cross the C437 for the bus users. Shelters could not be provided on The Street due to restrictions on width.

Other comment

22. The access visibility splays proposed at 2.4 metres (X dimension) and 90 metres to the east and 60m to the west (Y dimensions) are acceptable.
23. Tree planting must be controlled to avoid damage to the proposed roads, to ensure an efficient street lighting design and the safety benefits of street lighting, aren't compromised.
24. The number of dwellings is just below that where a travel plan is required but a Residents Travel Pack is recommended.
25. For information only, this site raises sustainability issues, as its over distance to the TPA High School, Thurston, and nearest HS Stowmarket so the County Council will pick up costs of £13,509 p.a. at today's costs for transporting children to school.

Indicative Layout

26. The site boundary follows the edge of roads shown on drawing 200B, which abut the public open spaces proposed in application reference MS/4491/16. If these roads were to be laid out to this design and dedicated as public highways then 1m wide strips abutting the site would be required as highway verge or possibly wider as footway. Street lights may be required to be erected in the adjacent site too.
27. The indicative layout includes two cul-de-sacs linked by a footway all abutting the adjacent site. It would be preferable to create a carriageway loop and not have these cul-de-sacs to avoid HGVs having to reverse creating a safety hazard and to reduce vehicular traffic past plots 15-20. The 'intrusion' of the adjacent site into this one between the cul-de-sacs shown would mean the linking carriageway having to divert to form a looped arrangement.
28. Conversely, the turning head on the road accessing plot 1 is some 45m from the end of the road and 'intrudes' into the adjacent site. The County Council would not wish to adopt the road where it serves

five or fewer dwellings with little chance of this being increased in the future. A minimum length of 11m beyond the turning head would be required to meet Suffolk Design Guide Type D standard. Therefore, with the turning arm as shown, plots 1-3 would be served by a private drive. The side arm is not long enough at approximately 12m from the north kerb; it should be 14m plus 2m overhang. Thus, the road would need to be realigned to avoid the arm intruding into the adjacent site.

Finally, please do not hesitate to contact me should you require clarification on any of the matters raised above.

Yours sincerely,

Mr Christopher Fish

Senior Development Management Engineer
Strategic Development – Resource Management



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
Operations (East)
planningee@highwaysengland.co.uk

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 4489/16

Referring to the planning application referenced above, dated 14 November 2016, application with all matters reserved, except for access, for the erection of up to 79 dwellings, Land north of Old Stowmarket Road, Woolpit IP30 9QS, notice is hereby given that Highways England's formal recommendation is that we:

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

Highways Act Section 175B ~~is~~ is not relevant to this application.¹

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

Signature:

Date: 5 December 2016

Name: David Abbott

Position: Asset Manager

Highways England:

Woodlands, Manton Lane
Bedford MK41 7LW

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