

## Mid Suffolk District Council



## Hoxne Neighbourhood Plan 2022 - 2037

### Reg 16 Submission consultation responses

During winter 2022, Hoxne Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Wednesday 15 February until Friday 31 March 2023.

Nine representations were received. They are listed below and copies are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Mid Suffolk District Council
(3)	Natural England
(4)	Historic England
(5)	Water Management Alliance
(6)	National Highways
(7)	Defence Infrastructure Organisation, obo the MOD
(8)	J. Havers - Landowner
(9)	Evolution Planning, obo Mr Mager

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# (1) SUFFOLK COUNTY COUNCIL

Date: 31 March 2023  
Enquiries to: Georgia Teague  
Tel: [REDACTED]  
Email: [REDACTED]  
[neighbourhoodplanning@suffolk.gov.uk](mailto:neighbourhoodplanning@suffolk.gov.uk)



Mid Suffolk District Council  
Endeavour House,  
8 Russell Road,  
Ipswich  
IP1 2BX

Dear Mr Bryant,

## **Submission Consultation version of the Hoxne Neighbourhood Plan**

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Hoxne Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan, the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

SCC has no specific comments to make on the Hoxne Neighbourhood Plan at this time.

However, the following comments are made on the AECOM Design Code.

The Consultation Statement has indicated "The Design Code was prepared by AECOM and cannot be amended", however, SCC believes this to be incorrect.

Locality have indicated to SCC that when comments need to be addressed, the design code and masterplans can be updated by AECOM and would be approved by Locality.

Planning Practice Guidance<sup>1</sup> indicates that design codes and guidelines “are best prepared in partnership to secure agreed design outcomes and maintain viability” and that “masterplans can benefit from a collaborative approach between the local planning authority, site promoters and local communities so that aspirations and constraints are understood early on.”

As such, our comments raised during the pre-submission consultation should be reconsidered, and the Concept Masterplans and Design Code should be amended as we have proposed.

The following text is from the Reg14 letter SCC submitted, and is suggested to be incorporated:

In paragraph 2.3 on page 10 we would suggest referring to the significant network of PROW in and around Hoxne and part of the landscape and local green infrastructure.

We are pleased to see reference to PROW feeding into the village from the surrounding countryside at paragraph 2.6 on page 12, and also the suggestion that PROW should be used to improve links between the village and the surrounding countryside and links between local space on page 32.

We support the aim of encouraging walking and cycling by establishing routes on PROW, however, we would have liked to have seen a map showing the local PROW network.

The Design Code supporting document should be compatible with existing SCC highways standards to ensure that the design code does not make new development unsuitable for adoption by the Highway Authority.

It appears to generally accord with the Suffolk Design: Streets Guide, but this document should state that road and footway layouts should also accord with Local Highways Authority requirements to ensure they are acceptable to the LHA with regard to road adoption.

We also note that page 81 of the Design Code indicates a total of 50 dwellings over the two sites (15 at Denham Low Road and 35 at Shreeves Farm), however, Shreeves Farm has been allocated for 38 dwellings according to Policy 13.

We have no further comments to make for this consultation, but we request to continue to be informed as this plan progresses.

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If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague  
Planning Officer  
Growth, Highways, and Infrastructure

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<sup>1</sup> <https://www.gov.uk/guidance/design#para008>

## (2) MID SUFFOLK DISTRICT COUNCIL

Our ref: Hoxne NP R16 Response

Dated: 31 March 2023

From: Planning Policy Team, BMSDC

To: Janet Cheesley (Hoxne NP Examiner)

cc: NP Steering Group

Dear Janet,

- 1. Hoxne Neighbourhood Plan 2022 - 2037**
- 2. Reg 16 Submission Consultation – Comments from Mid Suffolk District Council**

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).

The District Council welcomes the changes that have been made to the Hoxne Neighbourhood Plan in response to our previous consultation response.

There are still some areas where we feel that the Hoxne Neighbourhood Plan can be further improved, or which may simply have been overlooked during the submission preparation. We set these out as succinctly as possible in the appended table and, subject to your agreement, propose that many of these fall into the category of minor modifications.

We trust that all of our comments are helpful.

Yours sincerely

Caileigh Gorzelak

Strategic Planning Policy Officer

Babergh & Mid Suffolk District Councils

T: 01449 724595

E: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)



**Reg 16 Submission draft Hoxne Neighbourhood Plan 2022 - 2037**  
**Comments and further observations from Mid Suffolk District Council**

Policy/Para	Comment / Modification
Contents Page	The page numbers have been removed in this version of the plan and will need to be added.
Joint Local Plan references Para 2.5-2.10	<p>We note the updates to this section in regard to the progress of the JLP. The JLP Main Modifications consultation has gotten underway since the submission of this plan. While we don't believe this has any direct implications for the content of this plan there are some important distinctions to make.</p> <p>It should be noted that no part of the JLP has been 'withdrawn', some sections are being removed as part of the modification process as per the Inspectors' recommendation. In order to be consistent with other neighbourhood plans, and with the terminology used by the District Council we suggest the follow amendments.</p> <p>In paragraph 2.6:          "The Examination found that the policies of the Local Plan that relate to the scale, distribution of housing development, housing allocations and settlement boundaries unsatisfactory. <u>As per the Inspectors' recommendation, in a letter dated December 2021, these policies will now come forward through a Part 2 Joint Local Plan in the future</u>".</p> <p>We suggest the first paragraph of 2.7 be amended as follows:  <u>"In the November 2020 Draft Joint Local Plan</u>, Hoxne was identified as..."</p> <p>Paragraph 2.8:          "The <u>draft Joint</u> Local Plan did provide an allocation..."</p> <p>In order to be consistent with both the NPPF and District level policy we continue to suggest amending Paragraph 2.9 as follows:          "the <u>Joint</u> Local Plan requires all sites of <u>10</u> dwellings or more or 0.5ha or more..."  <i>This should also be updated in paragraph 5.3</i></p> <p>Para 2.10 should read:          "Finally, the <u>Joint</u> Local Plan..."</p>
Para 5.5	<p>To be consistent with the current status of the JLP and our suggestions above, we suggest updating paragraph 5.5 to read:</p> <p>"This Plan allocates two sites for development in the Heckfield Green area. One, also identified in the <u>November 2020 Draft</u> Joint Local Plan, is at Shreeves Farm and the other is a site between Denham Low Road and the Playing field."</p>

	<p>Para 5.8 should also be amended to read:</p> <p>“The majority of this site <b>was</b> also allocated in the <b>Draft</b> Babergh and Mid Suffolk Joint Local Plan for about 30 homes...”</p>
<p>Policies HOX12, HOX13 and HOX14</p>	<p>The partly amended M4(2) Standards references in these policies and supporting text are still contrary to the <a href="#">Written Ministerial Statement</a> dated 25 March 2015 in that it imposes additional technical standards. We recommend that these are amended to ‘support’ M4(2) standards rather than require it.</p> <p>We suggest the following wording:</p> <p>“Some homes suitable for older people should be provided in the form of bungalows or adaptable and accessible homes. <b><u>Dwellings built to M4(2) standards will be supported.</u></b>”</p> <p>It may be reassuring to note that modified JLP policy LP24 (as per <a href="#">Main Modification 59</a>) is requiring 50% of dwellings to meet M4(2) standards – <i>subject to consultation</i>.</p>
<p>HOX13</p>	<p>If the site was unable to achieve 38 new dwellings, it would impact on the number of affordable dwellings able to viably come forward.</p> <p>For this reason, we suggest the third paragraph is amended to read:</p> <p>“<b><u>35%</u></b> affordable homes for sale or rent should be provided...”</p>
<p>Biodiversity</p>	<p>We have not commented on this previously. Our Biodiversity Officer has suggested that the plan would benefit from a map showing meadows, woodlands, hedges, veteran trees etc. within the village, as has been done for other features of importance. HOX3 explains that these features should be retained, and a map would strengthen the policy.</p>
<p>Figures 8, 9 and 10</p>	<p>There are two maps labelled as Figure 8. Should the map on page 26 be Figure 9, as per the contents page?</p> <p>Figure 10, which is referred to in Policies HOX13-15, does not appear within the plan.</p>
<p>Glossary</p>	<p>We appreciate the addition of a glossary as per our previous recommendation. However, we note some of the terms defined do not appear within the plan. They should be deleted:</p> <ul style="list-style-type: none"> <li>• Inquiry</li> <li>• Planning Gain</li> <li>• SHLAA</li> <li>• SHELAA</li> <li>• SHMA</li> <li>• Public Inquiry</li> <li>• Sustainability Appraisal</li> <li>• Statutory Undertaker</li> </ul>

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## (3) NATURAL ENGLAND

Date: 24 February 2023  
Our ref: 421803  
Your ref: Hoxne Neighbourhood Plan



Mr P Bryant  
Babergh & Mid Suffolk District Councils  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

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

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Bryant

### **Re: Regulation 16 of the Neighbourhood Plan**

Thank you for your consultation on the above dated 14 February 2023

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft Regulation 16 of the Hoxne neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Joanne Widgery  
Consultations Team

# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural environment information sources

The [Magic](#)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas (NCAs)** divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)<sup>5</sup> website and also from the [LandIS website](#)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> sets out supporting guidance.

**Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.**

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

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<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

## (4) HISTORIC ENGLAND



Historic England

Mr Paul Bryant  
Babergh & Mid Suffolk District Councils  
Endeavor House  
8 Russell Road  
Ipswich  
Suffolk  
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00615982

28 March 2023

Dear Mr Bryant

### Ref: Hoxne Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide further detailed comments at this time. We are pleased to note that our previous comments have been taken into account. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James  
Historic Places Advisor, East of England  
[Edward.James@HistoricEngland.org.uk](mailto:Edward.James@HistoricEngland.org.uk)



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
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# (5) WATER MANAGEMENT ALLIANCE



Waveney, Lower Yare  
and Lothingland  
Drainage Board

Waveney, Lower Yare and Lothingland  
Internal Drainage Board  
Pierpoint House  
28 Horsley's Fields  
KING'S LYNN  
Norfolk PE30 5DD

01553 819600  
planning@wlma.org.uk

Our Ref: 23\_21361\_P

10/03/2023

Dear Sir/Madam

## RE: Hoxne Neighbourhood Plan

Thank you for consulting the Waveney, Lower Yare and Lothingland Internal Drainage Board on the Hoxne Neighbourhood Plan.

Hoxne falls partially within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to any development within the Board's area.

The principal function of the IDBs is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.

The area outside the Boards' IDD falls within the Boards' watershed catchments (meaning water from the site will eventually enter the IDD). The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance [SuDS discharge location hierarchy](#).

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

Please see the list overleaf of the proposed sites for development which we consider may impact the Board's area. The Board would seek to comment on should they come forward for planning permission, alongside an explanation of any potentially required consents should these sites be developed. Please note that this list is not exhaustive and the Board may or may not choose to comment on additional site allocations if and when more information is presented.



Hamish Thomson-Carrie (Chairman)

Ben Blower (Vice Chairman)

Phil Camamile (Chief Executive)

Constituted in 2006. Statutory Instrument 2006 No. 2140



Site reference	Within IDB / Watershed	Comments
Shreeves Farm Site	WLYLIDB Watershed catchment	Major residential development. Whilst outside the Board's IDD, the Board would comment to promote sustainable drainage as any runoff will enter the Board's district indirectly.
PL2 Site	WLYLIDB Watershed catchment	Major residential development. Whilst outside the Board's IDD, the Board would comment to promote sustainable drainage as any runoff will enter the Board's district indirectly.

### **Byelaw 3- Discharge of Surface Water into the Board's District**

- If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If (following testing) a strategy wholly reliant on infiltration is not viable and/or a development proposes to discharge surface water to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at [https://www.wlma.org.uk/uploads/WMA\\_Table\\_of\\_Charges\\_and\\_Fees.pdf](https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf)).
- If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location.

### **Byelaw 3- Discharge of Treated Foul Water into the Board's District**

- If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3).

### **Byelaw 10 & 17- Work's within 7m of Board Maintained Watercourse/s and Works within the banks of Board Maintained Watercourse/s**

- Should any development include works within 7 metres of a Board maintained watercourse, consent would be required to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure).
- If the proposal includes works to install services within, make excavations within, or otherwise alter the banks of the aforementioned Board Maintained Watercourse, consent will be required as per Byelaw 17 of the Board's Byelaws.

### **Section 23 of the Land Drainage Act (1991) and Byelaw 4- Alterations Proposed to a Watercourse**

- Should any development include works to alter a Board maintained watercourse, consent will be required under the Land Drainage Act 1991 (and byelaw 4).
- Should and works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).



Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the [Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

I am pleased to note the inclusion of Policy Hox 8 in the Hoxne Neighbourhood Plan, however I recommend that this policy includes reference to the relevant regulators for drainage and flood risk (such as the Internal Drainage Boards, the Environment Agency and the Lead Local Flood Authority). These agencies are in place to support the provision of sustainable development and reducing flood risk. As outlined above, works to watercourses (such as surface water discharges and/or any alterations of said watercourses) will require consent from the relevant regulatory body, therefore it would be beneficial for the regulators to be included in the plan.

If you require any further information or would like to discuss the Board's regulation in more detail, please do not hesitate to contact us.

Kind Regards,

Phillipa

Phillipa Nanson  
Sustainable Development Officer  
Water Management Alliance

## How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development' section of the Board's website, here:

<https://www.wlma.org.uk/waveney-idb/development/>

For any additional help please call us on 01553 819600 or email [planning@wlma.org.uk](mailto:planning@wlma.org.uk).

## Byelaws

WLYLIDB Byelaws can be found via the following link:

[https://www.wlma.org.uk/uploads/WLYLIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/WLYLIDB_Byelaws.pdf)

## Mapping

Mapping of the WLYLIDB's district can be viewed via the following link:

[https://www.wlma.org.uk/uploads/WLYLIDB\\_Index\\_Map.pdf](https://www.wlma.org.uk/uploads/WLYLIDB_Index_Map.pdf)

## Planning and Byelaw Strategy

The Board's Planning and Byelaw Strategy seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

The Planning and Byelaw Strategy can be found via the following link:

[https://www.wlma.org.uk/uploads/WMA\\_Planning\\_and\\_Byelaw\\_Policy.pdf](https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf)

## Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.

## Why we comment on planning applications:

By engaging with the planning process the Board is seeking to:

- Reduce flood risk to communities within the Internal Drainage District
- Promote sustainable development in sustainable locations by supporting sound planning decisions in accordance with the National Planning Policy Framework (especially [Paragraph 167](#)) and the [Non-standard technical standards for SuDS](#).
- Reduce the potential for conflict between the planning process and the Board's regulatory process.

For further information please refer to the Board's Planning and Byelaw Strategy.

## (6) NATIONAL HIGHWAYS



Hoxne Neighbourhood Development Plan  
Steering Group  
Hoxne Parish Council  
Church Hill  
Hoxne  
Eye  
Suffolk  
IP21 5AT

Operations (East)  
National Highways  
Woodlands  
Manton Lane  
Bedford MK41 7LW

28 March 2023

Email: [pc@hoxne.suffolk.gov.uk](mailto:pc@hoxne.suffolk.gov.uk)

Dear Sir/Madam,

### **Consultation on the Hoxne Neighbourhood Development Plan – Regulation 16 Submission Draft Consultation**

National Highways welcomes the opportunity to comment on the Regulation 16 submission draft consultation of the Hoxne Neighbourhood Plan which covers the plan period from 2022 to 2037.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to the Hoxne Neighbourhood Development Plan, our principal interest is in safeguarding the operation of the SRN in the vicinity of the Hoxne Neighbourhood Plan area, it should be noted, the Hoxne Parish is located more than 20km from the nearest SRN network including A11 trunk road in the west, A47 and A12 in the north and north-east and A14 in the south.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Hoxne is required to be in conformity with the Submission Draft Babergh and Mid Suffolk Joint Local Plan, the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Development Planning Regulations 2012.

We understand the Joint Local Plan has previously allocated to provide 43 dwellings for the 2018 – 2036 Plan period, including a site for 30 and 13 dwellings with planning permission. However, it is noted the Examination found that the policies of the Local Plan related to scale, distribution and housing allocation and settlement boundaries to be unsatisfactory and have been withdrawn from the Examination process in order to be reassessed and brought forward as Part B of the Plan in the future. Based on Policy Hox 10 – Housing Allocation, the plan proposes to provide around 66 new dwellings over the plan period (2022-2037). National Highways would expect to be consulted as and when these allocations for the parish and planning applications come forward in the usual way to confirm each application will be assessed by standard procedure in relation to their expected distribution and impact on the SRN.

Having reviewed the draft submission version of the Neighbourhood Plan, we note that the scale of growth remains low. Any potential impacts will be assessed accordingly.

National Highways therefore consider the limited level of growth proposed across the Hoxne Neighbourhood Plan area, will not have a significant impact on the operation of the SRN.

We have no further comments to provide and trust the above is useful in the progression of the Hoxne Neighbourhood Plan.

Yours sincerely,

Mark Norman  
Spatial Planner Manager  
Operations (East)  
Email: [mark.norman@nationalhighways.co.uk](mailto:mark.norman@nationalhighways.co.uk)

# (7) DEFENCE INFRASTRUCTURE ORGANISATION, obo the MOD



Defence  
Infrastructure  
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference: Hoxne Neighbourhood Development  
Plan 2022-2037 Reg 16 Consultation

Mobile: +44 (0) 7800 505824

Our reference: 10053888

E-mail: [DIO-Safeguarding-Statutory  
\(MULTIUSER\) DIO-Safeguarding-  
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory(MULTIUSER)@mod.gov.uk)

Paul Bryant  
Neighbourhood Planning Officer  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

31<sup>st</sup> March 2023

Dear Paul

It is understood that Babergh District Council are undertaking a consultation regarding their Hoxne Neighbourhood Development Plan 2022-2037 under Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

**Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.**

The MOD have an interest within the area covered by the Hoxne Neighbourhood Development Plan 2022-2037 in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Holbrook Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern.

**Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.**

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

*C Waldron*

Chris Waldron  
DIO Assistant Safeguarding Manager

## (8) J. HAVERS - Landowner

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents - Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	5.3	<b>Policy No.</b>	HOX 13 and HOX 11
----------------------	-----	-------------------	-------------------

**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	↔	<b>Have Comments</b>	

**Please give details of your reasons for support/ opposition, or make other comments here:**

We as the landowners of Shreeves Farm, the proposed location of the residential led scheme covered by Policy HOX 13, support the Plan. We have worked positively with the Neighbourhood Plan team throughout its production to this point to ensure the development will be a beneficial, sustainable, enduring and attractive addition to the village.

We believe that the Plan would provide much needed housing and affordable housing to the community, whilst maintaining the character of our village. Additionally, the adoption and development of Hox 13 would facilitate the viable relocation of our farming business away from the heart of the village. Not only does this keep a local business in operation and secure its future but it would also benefit the village's residents and visitors by removing the impacts of the farm from the village centre.

We propose that the plan accounts for all policy as it is updated and ensures that HOX 13 is provided with the appropriate flexibility to ensure it is viable and can be brought forward along with the benefits intended for our community.

**What improvements or modifications would you suggest?**

**Polley HOX 13:**

**Delete:** *The site should be developed in accord with the Hoxne Design Codes and the indicative Masterplan."*

**Insert:** *"Development proposals should demonstrate how they take account of the Hoxne Neighbourhood Design Codes."*

**Insert:** *"approximately" before "38" in line 3*

**Paragraph 5.3**

**Delete:** *"Therefore, sites to accommodate 53 dwellings would be required to ensure 19 affordable units are provided."*



*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

There is no requirement for a hearing to be held.

*(Continue on separate sheet if necessary)*

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Hoxne NP by Mid Suffolk District Council	✓

**I Signed:**  **Dated: 31 March 2023**

*[ PLEASE NOTE: THIS PAGE IS INTENTIONALLY BLANK ]*

## (9) EVOLUTION TOWN PLANNING, obo Mr Mager

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	David Barker
Job Title (if applicable):	Director
Organisation / Company (if applicable):	Evolution Town Planning
Address:	Opus House Elm Farm Park Thurston Bury St Edmunds Suffolk
Postcode:	IP31 3SH
Tel No:	01359 233663
E-mail:	david@evolution-planning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Mr N Mager
Address:	██████████ ██████████ ██████
Postcode:	████████
Tel No:	See Agent
E-mail:	See Agent

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	HOX 14
---------------	--	------------	--------

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	X	Oppose	
Support with modifications		Have Comments	

**Please give details of your reasons for support / opposition, or make other comments here:**

See accompanying letter for comments.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

None

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible ..*

(Continue on separate sheet if necessary)

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Hoxne NP by Mid Suffolk District Council	X

<b>Signed:</b> David Barker	<b>Dated:</b> 24.3.23
-----------------------------	-----------------------

Hoxne NP Consultation  
C/O Mr P Bryant  
Spatial Planning Policy Team  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Our ref: E226.C1.Let07  
29<sup>th</sup> March 2023

Dear Sir/Madam

**Hoxne Neighbourhood Plan Pre-Submission Consultation**

We are agents for the owners of the site allocation that is known as 'Land between Denham Low Road and Hoxne Playing Field' which is allocated for housing in Policy 14 of the Neighborhood Plan (NP). Our client's family has lived in the area for many years and has engaged with the Parish Council to promote a high quality development for this site. We promoted the land for development in the early stages of the NP preparation and have worked with the NP group in the latter stages of the preparation of the Plan.

Care has been taken to consider the advantages of the site and the benefits that the development can bring beyond the delivery of market and affordable housing. Local knowledge and meetings with the Parish Council identified that the vehicular access to Hoxne Playing Field is not ideal. It consists of a private access road one car wide with no dedicated provision for pedestrians. The access way runs along the northern boundary of the allocation site and there is currently no way of improving it because there is no available land. The access leads from the Playing Field to Denham Low Road. It was recognised at an early stage in the development process that combining an access to the playing fields with an access for the new housing would provide a wider access with better provision for pedestrians and cars.

Further assessments identified the lack of good pedestrian provision around the primary school. The primary school occupies a small site bounded on three of its four sides by roads with no footways adjacent to the school. The main gates on Denham Low Road lead directly onto the highway. The junction of Denham Low Road and Cross Street is very wide. The junction could be narrowed easily with new footways which would provide a safer pedestrian environment around the primary school. There is sufficient space in the public highway to extend the footpath from the primary school to the allocation site.

Evolution Town Planning Limited

**Registered Office:**

Opus House Elm Farm Park  
Thurston Bury St Edmunds  
Suffolk IP31 3SH

**Registered in England Number**  
10636748



These simple improvements will greatly enhance pedestrian safety around the primary school and allocation site. They have been prepared with the assistance of BHA Consulting. Their advice accompanies this letter and has previously been shared with the NP Group. The NP Group shared the information with the County Highways Authority in 2022 who had no objections to the proposals.

We support the allocation in Policy Hox 14 and consider that the development of the site can provide a range of benefits.

These include:

- Market and affordable housing;
- Housing to meet a range of local needs such as housing for older people and younger people;
- The existing vehicular access to the Playing Field is one car wide and the development can provide a wider access to the playing field for cars and pedestrians;
- Improved footway links in Denham Low Road;
- New pavements around the school and junction improvements between Denham Low Road and Cross Street;
- Facilitating improvements to the playing field; and
- The development of the site will allow better pedestrian and cycle access between the Shreeves Farm NP allocation and the Playing Field.

The development of the site is unconstrained as shown on the Constraints and Issues Plan on page 79 of the Hoxne Neighbourhood Plan Design Code. The site is well related to the built-up area of the village, the playing fields, and the other NP housing allocation.

The majority of the hedges around the site can be retained when development takes place except where removal is required for access. Within the site boundaries, the site is grass having been grazed by horses for many years. The site is not productive agricultural land and has not been used for agriculture for a long time.

We consider that the site can provide a high quality housing development that provides housing to meet local needs as well as a range of local community and highway developments. We support the allocation and would be happy to address any questions from the NP group or from the NP Examiner.

Yours faithfully

A handwritten signature in black ink, appearing to read 'DB', is written over a faint, light blue circular stamp.

**David Barker** MRICS MRTPI  
Director



## Transport Statement

Proposed Residential Development,  
Land off Denham Low Road, Hoxne

Mr N Mager



CIVIL - STRUCTURAL - ENVIRONMENTAL - ENGINEERING CONSULTANTS

PRE-PLANNING & DEVELOPMENT ADVICE – DETAILED DESIGN – PROFESSIONAL SERVICES

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## Document Control Sheet

Project Name:	Land off Denham Low Road, Hoxne
Client:	Mr N Mager
Project Reference:	3662
Report Title:	Transport Statement
Document Reference:	Version 3

	Name	Position	Signature	Date
Prepared By:	Rhys Buckle	Civil Engineer		13.07.2021
Approved By:	Kay Elvy	Director		13.07.2021
For and on behalf of BHA Consulting Ltd				

Prepared by	Approved by	Version	Description	Date
RB	KE	V2	Updated to Comments	21.07.2021
RB	KE	V3	Updated to Reflect Highway Boundary Plan	26.08.2021

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## Contents

Executive Summary	1
1 Introduction	3
2 Site Appraisal	4
3 Proposed Development	10
4 Conclusion	11

## Appendices

Appendix A: Site Plan

Appendix B: Proposed Highway Works Plan

Appendix C: Crash Map Data

Appendix D: Suffolk County Council Highway Boundary Plan

## Executive Summary

<p>Site Setting</p>	<p>This short Transport Statement is provided in support of a land allocation for up to sixteen residential properties on land off Denham Low Road, Hoxne.</p> <p>The Site is located south east of Hoxne village centre in Heckfield Green off Denham Low Road adjacent to the playing field, pavilion and bowling green. The site is currently grass meadow, the land to the south is arable farmland, the pavilion and playing field west, Denham low road directly to the east and residential properties to the north.</p> <p>Access to the pavilion and playing field is gained from Denham Low Road, via a narrow shared use access road located along the northern site boundary with insufficient width for two cars to pass leading to conflict between vehicles and pedestrians.</p>
<p>Proposed Development</p>	<p>The proposal is to redevelop the land to accommodate up to 16no residential dwellings with singular vehicular access from Denham Low Road to combine the existing vehicular access to the pavilion and future access to the site. The existing vehicular entrance will have bollards installed at the entrance and become pedestrian only access, providing a safer pedestrian access.</p> <p>As part of the overall development, it is the intention to widen Denham Low Road to a width of 4.8m where possible, to allow two cars to pass up to the newly proposed site entrance this will provide safer access for vehicles using the existing pavilion, bowls club, playing fields and provide adequate access to the newly proposed residential development. A footway link will be formed from the existing footway to the north to the existing shared access to prevent pedestrians from using the existing verge providing a betterment to the existing situation reducing conflict between pedestrians and vehicles.</p> <p>It is also proposed to improve the junction from Cross Street into Denham Low Road in order to improve both vehicular and pedestrian safety. The current junction is particularly wide with large radii which allows vehicles to park directly at the junction, and there is no footway directly adjacent to the school. By reducing the radii and widening the footway provision directly adjacent to the school it is possible to create a shorter pedestrian crossing distance and greater area of footway providing a safer pedestrian area around the school.</p>
<p>Conclusions</p>	<p>The Site has good access and good availability to public transport to other local towns and villages and is within walking/cycling distance to the village amenities.</p>

	<p>The current junction into Denham Low Road will be improved and Denham Low Road widened within the current highway boundary final details will be agreed with SCC Highways department in order to provide a safer junction and pedestrian access arrangement.</p>
--	---

<p>This Executive Summary contains an overview of the key findings and conclusions in this report. No reliance should be place on any part of the Executive Summary until the whole of this report has been read. Other sections of the report may contain information which puts into context the findings summarised in the Executive Summary.</p>
--

# 1 Introduction

- 1.1 BHA Consulting Ltd (BHA) has been commissioned by Mr N Mager to produce highways access proposals in support of a potential housing site on land off Denham Low Road, Hoxne, to be referred to hereafter as 'the Site'.
- 1.2 This short report has been prepared for the benefit of the client and the contents should not be relied upon by others without the express written authority of BHA. If any unauthorised third party makes use of this report they do so at their own risk and BHA owes them no duty of care or skill.
- 1.3 The Site Plan is provided in **Appendix A** and is indicated within the red line boundary denoted by the number 4.
- 1.4 The proposal is to develop the land to accommodate up to 16no residential dwellings with a singular vehicular access from Denham Low Road with provision for further highways improvements, providing a betterment to the existing situation for use of the wider community.
- 1.5 As can be seen from the highway improvements plan at **Appendix B**, the proposals include the widening of Denham low road to a point just south of the newly proposed site/pavilion access. The widening increases the width of the current road by approximately 2m whilst providing a footway in place of the existing verge providing a footway link from the village to the pavilion and playing fields. The proposed improvements are indicated within the existing highways boundary indicated on the proposed highway works plan, with Suffolk County Council highways boundary plan indicated in **Appendix D**. The existing shared vehicular access from Denham Low Road to the pavilion will have bollards installed at its entrance to prevent vehicular access providing a safe pedestrian only route to the pavilion, playing fields and bowls club improving both the pedestrian and vehicular accesses.
- 1.6 It is also proposed to improve the junction from Cross Street into Denham Low Road in order to improve both vehicular and pedestrian safety. The current junction is particularly wide with large radii which allows vehicles to park directly at the junction, and there is no existing footway directly adjacent to the school entrance. By reducing the radii and widening the footway provision directly adjacent to the school it is possible to create a shorter pedestrian crossing distance and greater area of footway providing a safer pedestrian access to the school.
- 1.7 These proposals will be developed with SCC highways to ensure the improvements are both acceptable and implementable within the existing highway boundary.

## 2 Site Appraisal

### Site Setting

- 2.1 The Site is located south east of Hoxne village centre in Heckfield Green off Denham Low Road adjacent to the pavilion, playing field and bowling green. The site is currently grass meadow, the land to the south is arable farmland, the pavilion and playing field west, Denham low Road directly to the east and residential properties to the north.
- 2.2 Access to the pavilion is gained from Denham Low Road, via a narrow shared use access road located along the northern site boundary with insufficient width for two cars to pass leading to conflict between vehicles and pedestrians.



Figure 2.1: Site Location Plan: Aerial View



Photograph showing junction from Cross Street to Denham Low Road



Photograph showing junction from Cross Street to Denham Low Road



Photograph showing junction from Cross Street to Denham Low Road adjacent to school



Photograph showing junction from Cross Street to Denham Low Road adjacent to school



- 2.3 Denham Low Road currently provides access to residential dwellings and the pavilion/playing field & bowls club. At its junction with Cross Street Denham Low Road is very wide and has an exceptionally wide junction exceeding requirements of the road it provides access to.
- 2.4 There is currently a footway part way along Denham Low Road but this does not extend up to the access to the pavilion entrance so there is currently no safe pedestrian access from the village to the pavilion or playing fields.
- 2.5 The photograph below indicates the hedge beyond the brick pier at the point of the private access which is within the current highway boundary and will need to be removed to construct the improvements.



Photograph showing view along Denham Low Road from its junction with Cross Street.

- 2.6 The existing road ranges from 4.8m to 2.5m in width and where the road begins to narrow it is offset to the west with no footway provision from the point that it narrows.
- 2.7 The pavilion access has limited visibility in either direction and is very narrow with no lay-by provision so it is not possible for two cars to pass along the whole of its length.



Photograph showing views north and south from the pavilion access along Denham Low Road.



Photographs showing existing access to the pavilion.

- 2.8 Crash map data has been provided in **Appendix C** indicating there is one slight incident occurring on Cross Street within the last five years, but this is not associated with Denham Low Road or Its junction with Cross Street.

---

## 3 Proposed Development

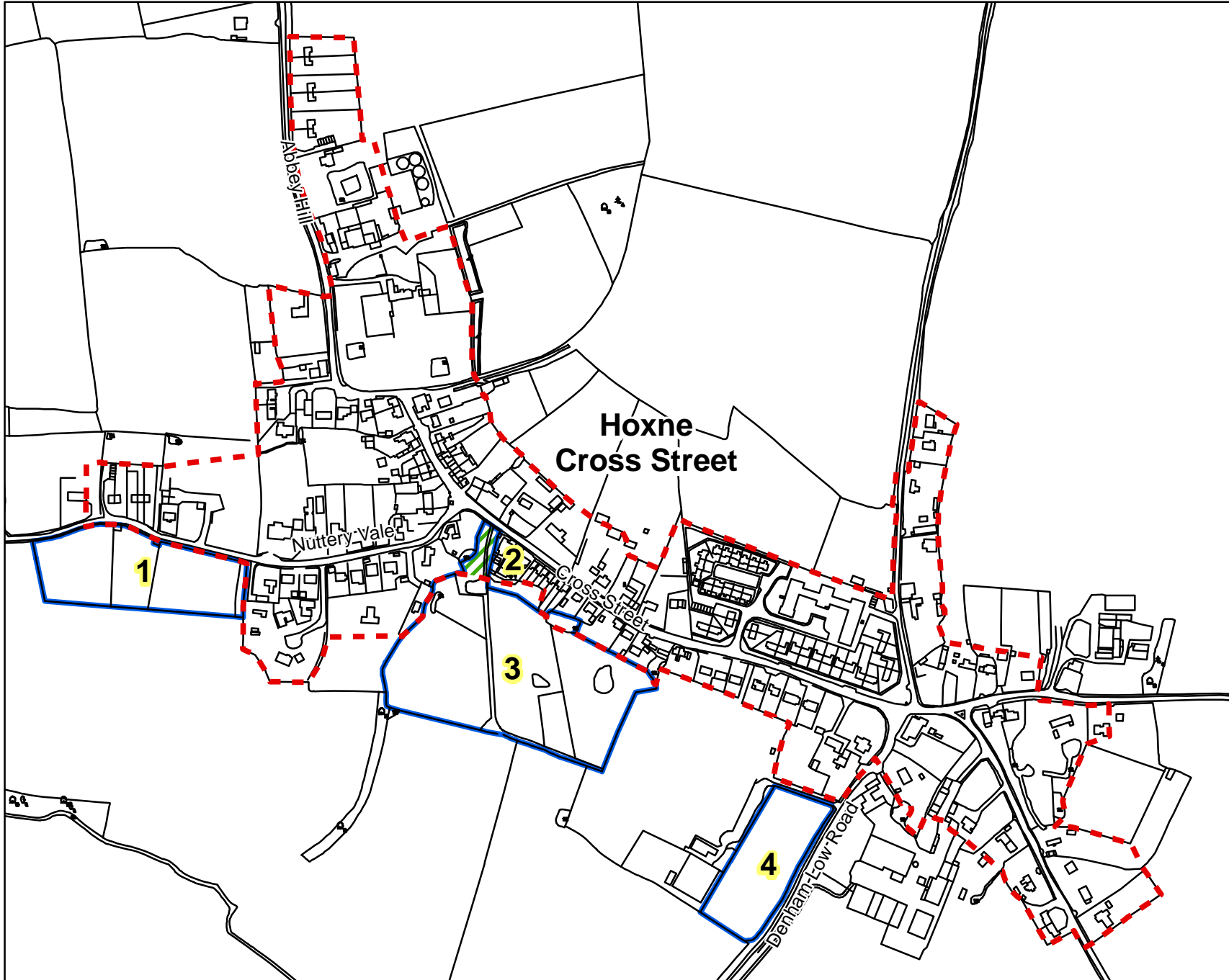
### Access

- 3.1 Access to the new residential development will also provide a new vehicular entrance to the pavilion, playing field and bowls club. Providing improved visibility and increased width allowing two vehicles providing a much-needed betterment.
- 3.2 Bollards will be installed at the entrance of the existing vehicular access providing a pedestrian only access removing conflict between vehicles and pedestrians.
- 3.3 It is also proposed to widen the existing road and to provide a footway in place of the existing verge as shown in the attached highway proposal plans, this will create a complete footway link between the village and the pavilion, bowls club and playing fields providing a much safer pedestrian route to the village facilities.
- 3.4 In order to widen the road its current alignment will need to be tweaked slightly to avoid the existing oak trees as indicated in the highway proposals plan.
- 3.5 The proposals also include improvements to the junction with Cross Street, the existing junction is extremely wide which is encouraging parking on the junction making it even more hazardous to cross and there is currently no footway directly adjacent to the school. Therefore the proposals include installing a smaller radii junction which will allow the footway to be widened providing larger pedestrian waiting areas at the junction adjacent to the school thus providing safer access to the school.
- 3.6 The highway improvement proposals will be developed with SCC highways to ensure they are both acceptable and implementable within the existing highway boundary.




## 4 Conclusion

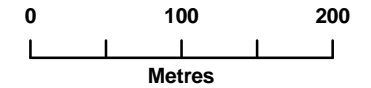
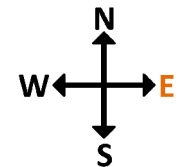
- 4.1 The Site has good access and good availability to public transport and walking/cycling routes to the village centre.
- 4.2 The highways proposals will not only allow adequate site access for the new development but will also provide improved access to the pavilion, playing field and bowls club, and also upgrade the junction of Denham Low Road and Cross Street providing a betterment to the existing situation by providing safer access to school and route to the local facilities.
- 4.3 The current junction into Oak Lane will be improved within the current highway boundary in order to enhance visibility on exiting the junction providing a safer junction arrangement and a betterment to the existing situation as agreed with SCC Highways.
- 4.4 This Transport Statement demonstrates that the site proposal complies with national planning policy requirements and is both accessible and sustainable and there will be no severe cumulative impacts caused by the proposed development.

## Appendix A: Site Plan



**Key**

-  Sites
-  Settlement boundary
-  Site 2



Project: E226 Mager Hoxne

Drawing title: Hoxne Cross Street

Drawing no: E226.1

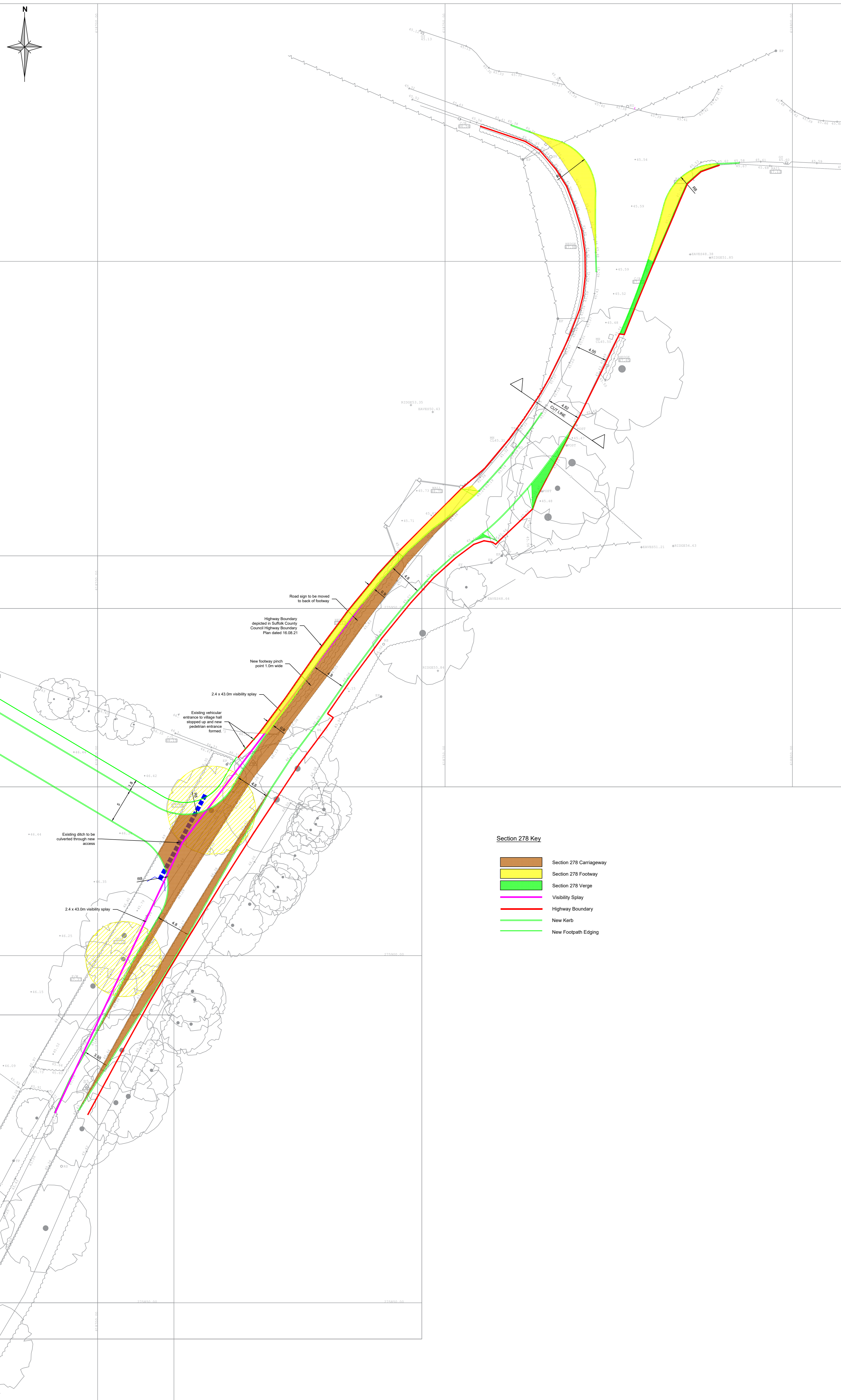
Rev. 0 Date: Dec 2013

Scale: 1:5000 at A4 Drawn: SB



## Appendix B: Proposed Highway Works Plan





**GENERAL NOTES**

1. This drawing and the works depicted thereon are the copyright of BHA Consulting Ltd. Unauthorised reproduction infringes copyright.
2. This drawing should be read in conjunction with BHA Consulting Ltd engineering related drawings and all relevant drawings by the Architect and other specialists.
3. This drawing is based on the Topographical Survey.
4. All dimensions are in millimetres unless stated otherwise.
5. All levels are in metres above ordnance datum (AOD) unless stated otherwise.
6. All co-ordinates are in metres to UK National Grid unless stated otherwise.
7. Do not scale from this drawing. All dimensions are to be checked and verified on site. Any discrepancy between this drawing and condition existing on site shall be reported to the Engineer.

**HIGHWAY WORKS NOTES**

1. All works within the existing highway shall be carried out fully in accordance with the New Roads and Street Works Act 1991 and to Chapter 8 of the Traffic Signs Manual. The contractor shall provide, erect, maintain and remove upon completion all temporary signing required for works carried out within the Highway. The contractor shall liaise with the Highways Authority with regard to agreeing appropriate methods of traffic management.
2. The reinstatement of the highway shall be carried out fully in accordance with the HAUC 'Specification for the Reinstatement of Openings in Highways'. Reinstatement shall be permanent (on first visit).
3. The contractor shall submit to the street works coordinator and utility companies the appropriate notices under the New Roads and Street Works Act 1991 and the Traffic Management Act. Upon completion of the works the contractor shall submit to the street works coordinator the appropriate completion notices.
5. All construction works to comply with current the Highways Authority's specifications.
6. New road markings to comply with TSRGD and the Highways Authority's specifications.

**Section 278 Key**

- Section 278 Carriageway
- Section 278 Footway
- Section 278 Verge
- Visibility Splay
- Highway Boundary
- New Kerb
- New Footpath Edging

**Preliminary Drawing**  
 This drawing is for preliminary purposes only and must not be read as a construction issue. It indicates design intent only and is subject to amendment during final design development

P3	Updated to Reflect SCC Highway Boundary Plan	23.08.21	RB	KE
P2	Road Alignment Updated & Junction Layout Added	09.07.21	RB	KE
P1	Initial Issue	23.06.21	RB	KE
Rev	Description	Date	By	App

P - Preliminary  
 C - For Construction

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Client  
 Mr N Mager

Project Title  
 Denham Low Road  
 Hoxne

Drawing Title  
 Off-Site Highways  
 Improvement Works

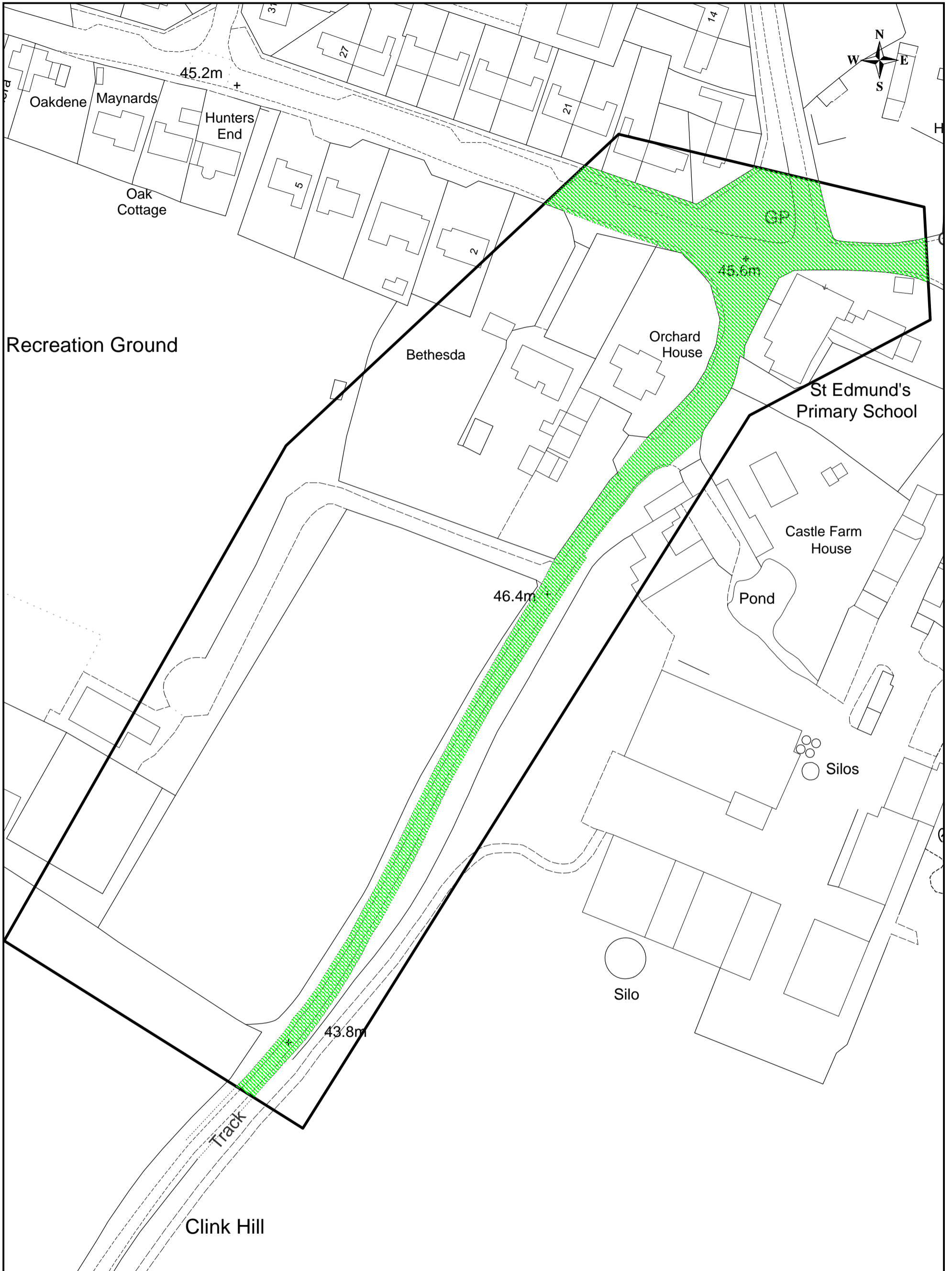
Drawn by RB	Checked by KE	Approved By KE
Size A1	Scale 1:250	Date June 2021

Drawing No. 3662-100	Rev P3
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## Appendix C: Crash Map Data



## Appendix D: Suffolk County Council Highways Boundary Plan

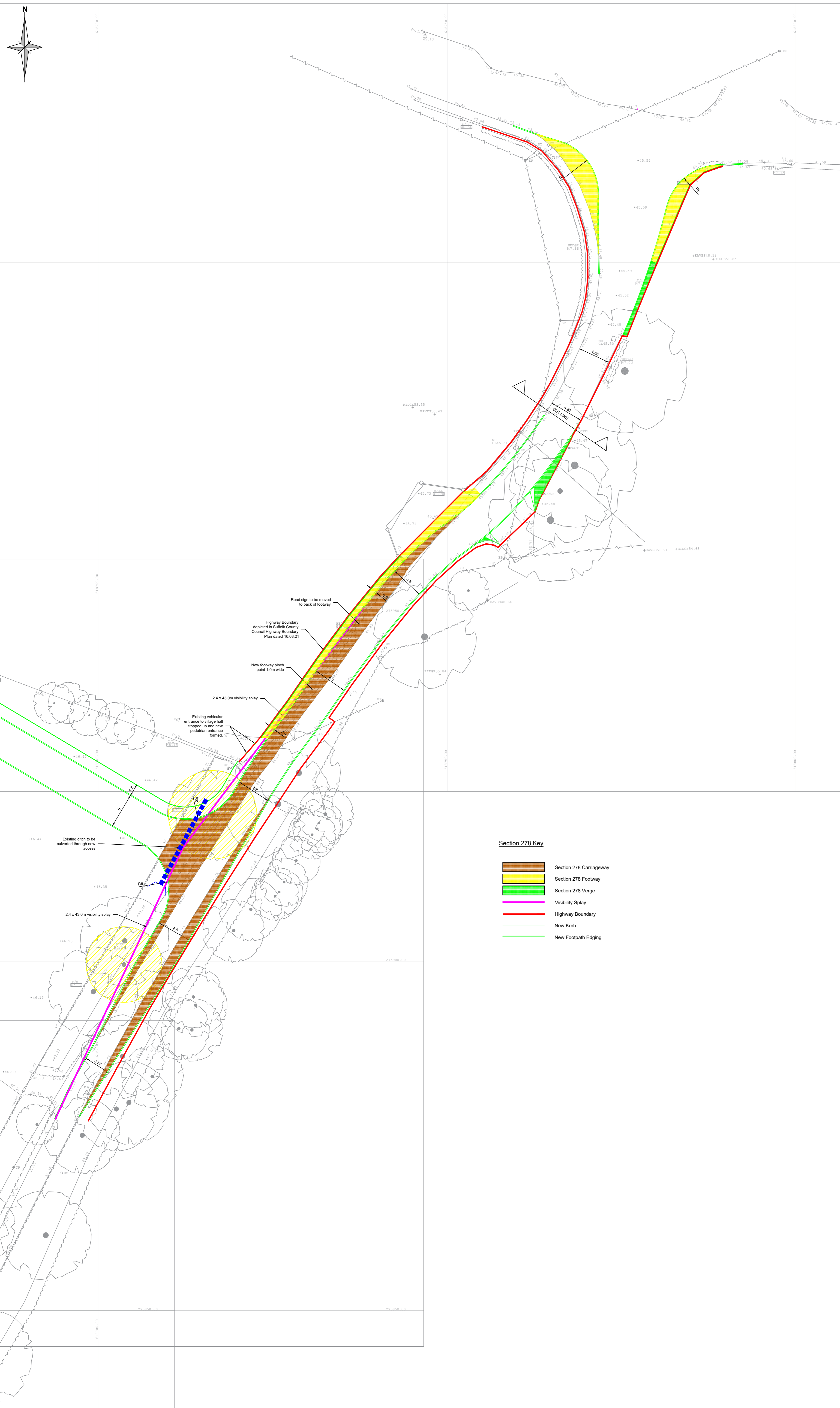


Scale 1:1000

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**Highway limits**  
**Denham Low Road, Clink Hill,**  
**Heckfield Green,**  
**Hoxne**

PRODUCED BY	DF
CHECKED BY	
DRAWING No.	
DATE	16 Aug 2021



GENERAL NOTES

1. This drawing and the works depicted thereon are the copyright of BHA Consulting Ltd. Unauthorised reproduction infringes copyright.
2. This drawing should be read in conjunction with BHA Consulting Ltd engineering related drawings and all relevant drawings by the Architect and other specialists.
3. This drawing is based on the Topographical Survey.
4. All dimensions are in millimetres unless stated otherwise.
5. All levels are in metres above ordnance datum (AOD) unless stated otherwise.
6. All co-ordinates are in metres to UK National Grid unless stated otherwise.
7. Do not scale from this drawing. All dimensions are to be checked and verified on site. Any discrepancy between this drawing and condition existing on site shall be reported to the Engineer.

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