

Mid Suffolk District Council

Needham Market Neighbourhood Development Plan

Submission Consultation Responses



On the 11 November 2020, Needham Market Town 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 2 December 2020 until Wednesday 27 January 2021.

Eleven organisations / individuals submitted written representations. They are listed below and copies of their representation are attached.

Also attached is a late representation received from the Ipswich & East Suffolk CCG

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Mid Suffolk District Council
(3)	Cllr Mike Norris
(4)	Natural England
(5)	Historic England
(6)	Anglian Water
(7)	Water Management Alliance
(8)	Highways England
(9)	National Grid (via Avison Young)
(10)	Suffolk Wildlife Trust
(11)	James Bailey Planning Ltd (obo Taylor Wimpey)
(12)	Ipswich & East Suffolk CCG

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(1) SUFFOLK COUNTY COUNCIL

Date: 26 January 2021
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: [REDACTED]



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

Dear Robert Hobbs,

Submission Consultation version of the Needham Market Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Needham Market 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.

Transport

It is acknowledged that the community wish to have more parking at the train station. Whilst this is not a basic conditions issue, it would be the preference of the county council that the plan consider good walking and cycling access to the train station above additional parking.

We do not have any further comments to make at this time, and welcome the changes made. 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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(2) MID SUFFOLK DISTRICT COUNCIL

Our ref: Needham Market NP R16 Consultation

Date: 27th January 2021

By e-mail to Ann Skippers (Independent Examiner)
cc: Kevin Hunter (Needham Market Town Council)

Dear Ann,

- 1. Consultation under Regulation 16 of the N'hood Planning (General) Regulations 2012 (as amended): The Needham Market Neighbourhood Development Plan**
- 2. Response from Mid Suffolk District Council**

The District Council have reviewed the submission draft Needham Market Neighbourhood Plan [the NMNP] and note that our previous comments have been taken into consideration. In its present form, and subject to any further modifications identified through the examination process, it should provide both the Town and District Council with a firm foundation on which to make effective planning decisions.

The timing of the submission of the NMNP and our publication of the Pre-Submission (Regulation 19) Joint Local Plan [hereafter referred to as the Reg 19 JLP] prompts us to recommend that the former needs some updating in this regard. We also propose a minor amendment to Policy NM1 which considers Housing Mix.

Implications for NMNP following publication of the Reg' 19 Joint Local Plan

The NMNP was formally submitted to Mid Suffolk on the morning of 11th November 2020, although the decision to submit appears to have been made by the Town Council at their meeting on 21st October 2020. On the evening of 11th November, an Extraordinary Meeting of Mid Suffolk Council took place at which Councillors agreed that the Reg 19 JLP be published for consultation. For these reasons it is understandable that, where the NMNP refers to or quotes from the Joint Local Plan, those references are now out of date.

With minor modification, we believe these matters can easily be addressed (e.g. updates to paragraphs 3.3 and 6.1.2) but two references in particular warrant specific mention. In both cases we suggest the relevant paragraphs could easily be updated and, in themselves, do not appear to give rise to any conformity issues.



Babergh and Mid District Councils
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk www.midsuffolk.gov.uk

- **NMNP para 6.1.3** correctly identifies that the July 2019 Preferred Options JLP set out a minimum housing requirement for the NMNP area of 497 dwellings. The Reg 19 JLP now sets out a revised figure of 512 dwellings. The three site allocations remain but two have revised housing figures, the sum of which equates to the additional 15 dwellings:
 - LA030: Land west of Stowmarket Road (Approx. 66 dwellings)
 - LA031: Former Needham Market Middle School Site (Approx. ~~40~~ 41 dwellings)
 - LA032: Former MSDC Offices and Car Park (Approx. ~~80~~ 94 dwellings)
- **NMNP para 6.1.5** correctly states that Market Towns in Mid Suffolk were expected to account for 25% of the growth over the JLP plan period, which equated to 3,057 dwellings. The extension of the JLP plan period to 2037 and other changes made now mean that Market Towns and Urban Areas in Mid Suffolk are expected to account for 31% of the growth over the new plan period, which equates to 3,966 dwellings.

You will also see that the town's position in the settlement hierarchy remains unchanged. (The last sentence in paragraph 6.1.5 refers.)

Policy NM1 – Housing Mix: Size, Type and Tenure

Our comments on policy NM1 as originally drafted are set out on page 23 of the Consultation Statement ([linked here](#)). Amongst other things, we questioned where and how the policy might apply. We also proposed alternate wording which, with some small adjustments, is the one shown in the submission draft plan.

Unintentionally omitted from our response was a reference to the fact that current planning guidance advises that affordable housing provision can only be sought on sites of ten or more dwellings or 0.5ha or more. Including a relevant note in the policy would remove the conflict that currently exists between policy NM1 and planning guidance. We also suggest a second note which recognises that not all housing types may be suitably accommodated on every site.

Re-worded, we suggest that policy NM1 read as follows:

POLICY NM1 – Housing Mix – Size, Type and Tenure

All new development proposals for more than 5 units shall provide for a wide range of housing types enabling a mixed and inclusive community and reflecting the local population.

Unless any exceptional reason is demonstrated all housing proposals shall accord with the latest available evidence of need **and** the mix of housing shall include:-

- Housing for Older People (to include Retirement living housing, supported/sheltered housing, bungalows and/or retirement complexes)
- Larger family housing (3-5 beds): both private and affordable
- Smaller housing (1-2 bed homes): both private and affordable
- Adaptable, 'life-time' homes ¹⁰
- Affordable housing ¹¹
- Self-build ¹²

Note 1: It should be noted that the above housing types may not be suitably accommodated on every site.

Note 2: Affordable housing provision should only be sought on sites of ten or more dwellings or 0.5ha or more.

We trust that our comments are helpful and would be happy to answer any further questions you may have.

Yours sincerely

Robert Hobbs
Corporate Manager – Strategic Planning
Babergh & Mid Suffolk District Councils – Working Together

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(3) COUNCILLOR MIKE NORRIS

E from: Mike Norris (Cllr)
Received: 1 Dec 2020
Subject: RE: CONSULTATION - Reg 16 Needham Market NDP (Mid Suffolk)

As I am a member of Needham Market Town Council I do have an interest in the Needham Market Neighbourhood Plan and therefore fully support it.

Regards,

Mike Norris
Mid Suffolk District Councillor
Joint Ward Member
Needham Market Ward

* * * * *

From: BMSDC Community Planning <communityplanning@baberghmidsuffolk.gov.uk>
Sent: 1 December 2020 12:20
To: [...]
Subject: CONSULTATION - Reg 16 Needham Market NDP (Mid Suffolk)

This e-mail has been sent obo Robert Hobbs (Corporate Manager - Strategic Planning)

Dear Sir / Madam

Consultation under Reg 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) - NEEDHAM MARKET Neighbourhood Development Plan

We are contacting you because you are a statutory consultee or because you / your client may have an interest in planning matters in the town and parish of Needham Market, Suffolk. Our apologies if this is no longer the case.

Please be advised that tomorrow (Wed 2 Dec 2020), we commence a formal eight-week public consultation on the submission draft version of the Needham Market NDP. Written representation are invited during the consultation period which **closes at 4:00pm on Wednesday 27 January 2021**.

Further details are set out in the attached letter and on this Council's website:
www.midsuffolk.gov.uk/NeedhamMarketNP

Yours faithfully

[Ends]

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(4) NATURAL ENGLAND

Date: 12 January 2021
Our ref: 336117
Your ref: Reg 16 Needham Market NDP



Mr P Bryant
Neighbourhood Planning Officer
Babergh & Mid Suffolk District Councils

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

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Bryant

Reg 16 Needham Market Neighbourhood Development Plan

Thank you for your consultation on the above dated 01 December 2020

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 Regulation 16 neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Joanne Widgery
Consultations Team

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(5) 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: PL00677022

14 January 2021

Dear Mr Bryant

Ref: Needham Market Neighbourhood Plan Regulation 16 Consultation

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

We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you 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 the neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district 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 NP, 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

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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(6) ANGLIAN WATER

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:	Mr Stewart Patience
Job Title (if applicable):	Spatial Planning Manager
Organisation / Company (if applicable):	Anglian Water Services Limited
Address:	Thorpe Wood House Thorpe Wood Peterborough
Postcode:	PE3 6WT
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 representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	NM2
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

As set out in our previous representations Anglian Water fully supports the incorporation of Sustainable Drainage Systems wherever possible to address the risk of surface water and sewer flooding and which have wider benefits including water quality.

The policy as drafted requires the incorporation of Sustainable Drainage Systems in major residential developments within the Parish only. This differs from the requirement which appeared in the Pre-submission Neighbourhood Plan which referred to all new development.

We consider that this requirement should not limited to major residential developments particularly as the Submission Draft Babergh and Mid Suffolk Local Plan refers to the use of SuDS in all new developments wherever feasible.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is therefore proposed that Policy NM2 is amended as follows:

'q) Proposals for developments ~~above 10 dwellings~~, shall include the use of Sustainable Drainage Systems (SuDS), which could include wetland and water features which can help reduce Floodrisk whilst offering other benefits such as protecting against pollution, wider amenity/ recreational and biodiversity benefit'

(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 responses through written representations.

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

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...
<i>Please be as brief and concise as possible ..</i>
<i>(Continue on separate sheet if necessary)</i>

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

The publication of the recommendations of the Examiner	X
The 'making' (adoption) of the Needham Market NDP by Mid Suffolk District Council	X

Signed: Stewart Patience	Dated: 7th December 2020
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(7) WATER MANAGEMENT ALLIANCE

E from: Planning <planning@wlma.org.uk>
Received: 8 Dec 2021
Subject: RE: CONSULTATION - Reg 16 Needham Market NDP (Mid Suffolk) –
Our Ref: 20_03534_P

Thank you for consulting us on the Needham Market Neighbourhood Development Plan.

As you may be aware the Parish is partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB). Please see our website for detailed mapping of each Board's District, specifically catchment CMT186G here:

Website https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf

CMT186G https://www.wlma.org.uk/uploads/ESIDB_186G_RGippingCentralN.pdf.

These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. Please be aware that the designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse).

In order to avoid the potential for future conflict between the Neighbourhood Plan and the Board's regulatory regime and consenting process please be aware of the following:

- For any development site within the Board's Internal Drainage District (IDD), the Board's byelaws apply. The Byelaws for the Board are available on the development pages of our website (https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf). Specifically please be aware of the following byelaws:
 - If a surface water (or treated foul water) discharge is proposed to a watercourse within an IDD (either directly or indirectly), then the proposed development will require a land drainage consent in line with the Board's byelaw 3. Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's [charging policy](#).
 - If the proposals include works within 9m of a Board adopted watercourse, consent is required under byelaw 10. Byelaw 10 restricts works within 9 metres of drainage or flood risk infrastructure (including adopted watercourses), the principle aim being to ensure watercourses can be maintained by the Board now and in the future without restrictions being placed on the Boards access, and to ensure operatives are aware of third party structures when undertaking maintenance.
- If proposals include works to alter a watercourse (including culverting for access) then Land Drainage Consent is required under Section 23 of the Land Drainage Act 1991. If inside the IDD then the IDB would be the consenting authority. If outside the IDD, then Suffolk County Council (Lead Local Flood Authority) would be the consenting authority.

I hope the above is useful.

Kind Regards,

Emma Robertson

Sustainable Development Officer
Water Management Alliance

Kettlewell House, Austin Fields Industrial Estate, King's Lynn, Norfolk, [PE30 1PH](#), UK
t: +44 (0)1553 819600 | f: +44 (0)1553 819639 | e: info@wlma.org.uk | www.wlma.org.uk

Consisting of [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#) and [Waveney, Lower Yare and Lothingland IDB](#) in association with [Pevensey and Cuckmere Water Level Management Board](#), [Upper Medway IDB](#) and [Lower Medway IDB](#).



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(8) HIGHWAYS ENGLAND

E from: Planning EE <PlanningEE@highwaysengland.co.uk>
Received: 8 Jan 2021
Subject: Consultation under Reg 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) - NEEDHAM MARKET Neighbourhood Development Plan

Dear Paul

Thank you for your consultation on the above Neighbourhood Development Plan.

We have reviewed the details and information provided. The detail of the NDP is unlikely to result in any adverse effect upon the Strategic Road Network (SRN).

Consequently, we offer **No Comment**.

However, Highways England would request continuing engagement regarding the proposed link road onto the A14, and any changes to local transport that could have impact on the SRN, such as discussed in 6.5.4 of the NDP.

Yours sincerely

Emma Wood

Spatial Planner | Operations (East) | Highways England
Woodlands | Manton Lane | Bedford | MK41 7LW

Web: www.highwaysengland.co.uk

For any planning related matters please email PlanningEE@highwaysengland.co.uk

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(9) NATIONAL GRID

**AVISON
YOUNG**

Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/15B901605

13 January 2021

communityplanning@babberghmidsuffolk.gov.uk

Via email only



Dear Sir / Madam

Draft Needham Market Neighbourhood Development Plan – Regulation 16 Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed by or in close proximity to National Grid Assets

Following a review of the above document we have identified that one or more proposed development sites have been identified as being crossed or in close proximity to National Grid assets.

Details of the sites affecting National Grid assets are provided below.

Electricity Transmission

Neighbourhood Plan Site Reference	Asset Description
Lionbarn Employment Site	4YM ROUTE TWR (001 - 195): 400Kv Overhead Transmission Line route: BRAMFORD - NORWICH MAIN 1

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that the plan is illustrative only.

National Grid also provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI
Director
0191 269 0094
nationalgrid.uk@avisonyoung.com
For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:



- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team

Block 1

Brick Kiln Street

Hinckley

LE10 0NA

0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Needham Market NDP - Reg 16



13/01/2021, 17:21:18

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Electric_Assets_4020

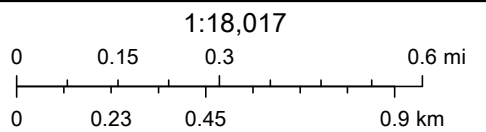
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(10) SUFFOLK WILDLIFE TRUST

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:	Mr Jacob Devenney
Job Title (if applicable):	Planning and Biodiversity Adviser
Organisation / Company (if applicable):	Suffolk Wildlife Trust
Address:	Brooke House Ashbocking Ipswich
Postcode:	IP6 9JY
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 representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	6.4.1 – 6.4.6	Policy No.	NA
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

Whilst we are pleased to see that the Needham Market Neighbourhood Plan recognises the importance of 'Wildlife and Landscaping' within Policy NM2 – Securing Good Design, we are concerned that there is no specific policy for biodiversity within the Neighbourhood Plan. As stated within the National Planning Policy Framework (NPPF) (2019) (section 174), development should seek to provide biodiversity net gain therefore, we believe that the plan should be expanded to further safeguard species and habitats from fragmentation caused by development.

What improvements or modifications would you suggest?

A new policy should be created, possibly within the Natural Environment section. This policy should state how the Neighbourhood Plan will protect and enhance biodiversity within the Parish, in accordance with the NPPF (section 174). It should incorporate those measures as set out in 'Wildlife and Landscaping' within Policy NM2 – Securing Good Design as well as being expanded to include the points below:

Lion Inn Meadow and Chalk Pit County Wildlife Site, Chalkeith Road Meadow County Wildlife Site and the River Gipping (sections) County Wildlife Site are located within the Parish. County Wildlife Sites are non-statutory designation sites recognised within the NPPF (section 174) as 'Locally Designated Sites'. Therefore, the County Wildlife Sites should be referenced within a policy within the Neighbourhood Plan, to help ensure that the objectives of maximising the Parish's biodiversity are met.

The policy should reference safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. The NPPF (section 174) identifies that all development should protect and enhance biodiversity, including to 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' Therefore, developments must demonstrate that they result in the net gain of Priority Habitats and not result in a negative impact upon protected and Priority Species.

Policy NM2 makes brief mention of enhancing and extending existing wildlife corridors but gives little information in how this should be achieved. The policy should be expanded to encompass landscape scale ecological networks. We believe that the concept of an ecological network can include the River Gipping, including its associated habitats. This area is of value to biodiversity, with the River Gipping (sections) County Wildlife Site, Station Field Local Nature Reserve and Needham Lake Local Nature Reserve along this habitat, as well as further County Wildlife Sites in neighbouring Creting St Mary. In accordance with the NPPF (section 170), ecological

networks should be established to ensure that they are more resilient to current and future pressures. Therefore, protecting and enhancing these should be within this policy and ensure this ecological network is maintained. We would be happy to provide additional advice if required.

All future development proposals should apply the mitigation hierarchy to help deliver biodiversity net gain and reduce, as far as possible, negative effects on biodiversity. The mitigation hierarchy requires that in the first instance impacts are avoided, if they cannot be avoided then they should be mitigated for and only as a last resort should impacts be compensated. Enhancement and delivery of biodiversity net gain i.e. an approach that leaves biodiversity in a better state than before should be part of all development proposals, in line with the Government's emerging Environment Act predicted to receive Royal Assent in 2021. This should therefore be referenced within a policy within the Neighbourhood Plan to ensure that future development will not have a negative effect on the area's biodiversity and will deliver a biodiversity net gain.

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

Normally the Examiner will aim to consider the responses through written representations.

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

Please note that a 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	<input checked="" type="checkbox"/>
The 'making' (adoption) of the Needham Market NDP by Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed: Jacob Devenney

Dated: 26th January 2021

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**(11) JAMES BAILEY PLANNING LTD
(obo Taylor Wimpey UK)**

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:	Struan Power
Job Title (if applicable):	
Organisation / Company (if applicable):	Taylor Wimpey UK
Address:	
Postcode:	
Tel No:	
E-mail:	Struan.Power@taylorwimpey.com

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	James Bailey Planning Ltd.
Address:	Stirling House, 3 Abbeyfields, Bury St Edmunds, Suffolk
Postcode:	IP33 1AQ
Tel No:	01284 336 068 / 07860 610 858
E-mail:	james@jamesbaileyplanning.com / charlotte@jamesbaileyplanning.com

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	All Doc.	Policy No.	All Doc.
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

Needham Market is a highly sustainable location.

The Neighbourhood Plan appears to rely on the BMSDC JLP for its housing allocations.

It appears there is no strategic growth planned for Needham Market beyond 2028.

There are concerns over the delivery of necessary infrastructure for Needham Market.

Taylor Wimpey agrees with the Town Council that there is currently no mechanism for delivering a relief road for the south of Needham Market at present.

Needham Market Town Council should consider allocating strategic sites within the Neighbourhood Plan.

For full representations to the Neighbourhood Plan, please see the attached report with plans.

What improvements or modifications would you suggest?

The Neighbourhood Plan should consider aligning its housing figures and plan period with that of the BMSDC JLP to 2037.

Taylor Wimpey's site off Barking Road should be considered as a 'reserved site' within the Needham Market Neighbourhood Plan.

The land east of Barking Road will be able to make the necessary contributions to the infrastructure identified for Needham Market in both the Neighbourhood Plan and the Joint Local Plan.

For full representations to the Neighbourhood Plan, please see the attached report with plans.

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

Normally the Examiner will aim to consider the responses through written representations.

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

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

Taylor Wimpey think that the Neighbourhood Plan needs to make further strategic decisions beyond those outlined in the emerging BMSDC Joint Local Plan. This level of discussion and potential decision making needs to take place in a neutral and informed environment, which a Hearing with the Planning Inspectorate would provide.

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The 'making' (adoption) of the Needham Market NDP by Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:	Dated: 21.01.2021
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James Bailey
PLANNING

Document: Representations to Needham Market Neighbourhood Plan

Title: Needham Market Neighbourhood Plan (Reg 16)
Consultation December - January 2021

Client: Taylor Wimpey UK

Date: January 2021

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Introduction

- 1.1 These representations have been prepared by James Bailey Planning Ltd. on behalf of Taylor Wimpey UK.
- 1.2 James Bailey Planning Ltd. have also prepared similar representations on behalf of Taylor Wimpey to the recent Babergh Mid Suffolk District Councils Joint Local Plan (BMSDC JLP) Pre-Submission (Reg 19) Consultation.
- 1.3 Taylor Wimpey have continued to promote the land to the east of Barking Road over a number of years, through the Council's Call for Sites exercises and other policy Local Plan consultations.
- 1.4 It is acknowledged that the site lies within the Parish of Barking, which is just outside the Needham Market Neighbourhood Development Plan (NDP) boundary.
- 1.5 It is noted that there have been on-going discussions about a possible relief road to the south of Needham Market. It is considered that Taylor Wimpey could assist with helping to bring this significant infrastructure forward.
- 1.6 The Neighbourhood Plan has taken the decision not to include identified sites for future housing growth. Instead, the Neighbourhood Plan has chosen to rely on BMSDC's Joint Local Plan to make these strategic decisions.
- 1.7 In summary, these representations question why the Town of Needham Market, as one of Mid Suffolk's most important and sustainable settlements, is not taking the opportunity to identifying their own preferred sites that will allow for sufficient future growth within their Neighbourhood Plan.
- 1.8 It is recommended that the Neighbourhood Plan should consider Taylor Wimpey's site on land east of Barking Road, which has the capacity to deliver 120 dwellings. Hereafter, it will be referred to as 'The Site'.
- 1.9 Taylor Wimpey also recommends that The Site is explored as a future or 'reserved' site, should any of the JLP allocations not come forward as planned, or should it be discovered that Needham Market needs to find extra growth during the Neighbourhood and Joint Local Plan period. This approach has also been put forward to the BMSDC JLP.

Needham Market – a highly sustainable settlement

- 2.1 Needham market is one of three Towns in Mid Suffolk, as set out in the Mid Suffolk Settlement Hierarchy.
- 2.2 Needham Market has a series of amenities and facilities, including pre-schools; a primary school; doctors' surgery; dental practices; and importantly a train station.
- 2.3 It is noted that Policy NM2 refers to Securing Good Design and Layout, including footways, cycle routes, and connections. There is good footway provision along Barking Road. There is a local primary school within 1km walking distance from The Site, which equates to about a 13-minute walk. Furthermore, there is a local food store within 8-minutes' walk, and the local GP surgery is almost directly opposite The Site.
- 2.4 The nearest bus stops are within a 400m walking distance of The Site. This is also served by the school bus service (464) which operates between Great Blakenham – Needham Market – Stowmarket High School.
- 2.5 Needham Market Rail Station provides regular half hourly services between Ipswich – Needham Market – Stowmarket – Elmswell – Thurston – Bury St Edmunds – Kennett – Newmarket – Cambridge.
- 2.6 National Cycle Network 51 is located on Hawks Mill Street / High Street and is accessible within a 1.3km cycle of The Site. This comprises a predominately traffic free route to Combs Ford, and then onwards into Stowmarket. Combs Ford is a 4.8km / 16-minute cycle ride, whilst Stowmarket is a 5.6km / 18-minute cycle ride from the site.

Summary

- 2.7 It can therefore be seen that Needham Market is a highly sustainable location.
- 2.8 Taylor Wimpey' site off Barking Road is equally considered to be in a very sustainable location, should it be identified either in the Neighbourhood Plan or in the emerging BMSDC JLP.

Housing Numbers

- 3.1 It is noted that the current Joint Local Plan (Reg 19 – Nov 2020) has now been extended to cover an additional year to the period to 2037.
- 3.2 It is noted that the Needham Market Neighbourhood Plan covers the period 2020 to 2036.
- 3.3 The extended Joint Local Plan period means there is one year left unaccounted for within Needham Market Neighbourhood Plan.
- 3.4 From analysis of Policy SP04 – Spatial Distribution, and Table 04 of the emerging BMSDC JLP, it is clear that Needham Market is taking considerably less growth over the plan period than Mid Suffolk’s other Towns, (Stowmarket and Eye).
- 3.5 The Needham Market Neighbourhood Plan has used the BMSDC JLP figure of 497 homes for Needham Market up to 2036. However, the latest BMSDC JLP now identifies that 512 new homes are required for Needham Market, over the extended plan period to 2037.
- 3.6 The three proposed allocations identified for Needham Market in the JLP are all within the existing settlement boundary of the Town.
- 3.7 The three allocations are: Land west of Stowmarket Road LA030 (66); Former Needham Market Middle School LA031 (41); Former Mid Suffolk District Council Offices and Car Park LA032 (94). These total 201 new dwellings, with a further 311 dwellings coming from existing outstanding planning permissions (OPPs).
- 3.8 The three allocations for Needham Market have been identified to be delivered over a 7-year period between 2021 and 2028.
- 3.9 This approach would suggest that no further growth is expected for Needham Market for nearly 10 years, towards the latter part of the plan period 2029-37.
- 3.10 It is interesting to note that paragraph 6.1.11 of the Needham Market Neighbourhood Plan states: *“The Town Council is mindful of the need to plan for the longer term and to anticipate the future growth of Needham Market beyond the current Local Plan allocations”*.
- 3.11 It therefore appears that the Needham Market Neighbourhood Plan is avoiding making any difficult, or strategic decisions for this highly sustainable town.
- 3.12 Taylor Wimpey agrees with the Neighbourhood Plan in identifying that the proposed housing requirements are a ‘minimum’ figure. It is however suggested that the Neighbourhood Plan should take the opportunity to update their figures to align with the same timeframe as the emerging BMSDC Joint Local Plan.
- 3.13 The inclusion of Taylor Wimpey’s site off Barking Road could offer a long-term, strategic option to consider as a ‘reserve’ site, in accordance with; Policy NM1 Housing Mix – Size, Type, Tenure, and also NM2 Securing Good Design and Layout.

- 3.14 It is questioned why the Town Council have taken the decision not to allocated 'reserve' sites within the emerging Neighbourhood Plan, with the opportunity for securing essential future infrastructure that has been identified for the Town.
- 3.15 Needham Market is a highly suitable and sustainable town to accommodate growth. Therefore, the town council should look to identify reserved sites within Needham Market to account for the extended plan period to 2037, taking precedence from the success of the earlier Stowmarket Area Action Plan.

Summary

- 3.16 The Neighbourhood Plan should extend its plan period and update its housing figures to align with the emerging Joint Local Plan (Reg 19) consultation document.
- 3.17 There is genuine concern that the Needham Market Neighbourhood Plan has not identified or considered enough strategic growth for Needham Market to last the whole plan period.
- 3.18 Sites suitable should be identified for strategic growth for the plan period after 2028, or in case any of the allocated sites in the JLP fail to be delivered.
- 3.19 It is therefore recommended that Taylor Wimpey' site, land to the east of Barking Road should be considered as a 'reserved' site for 120 dwellings, which could only come forward should it become clear that further growth is needed for Needham Market after 2028.

Infrastructure for the future of Needham Market

- 4.1 The Neighbourhood Plan agrees with the infrastructure requirements for Needham Market as described on p.429 of the emerging Joint Local Plan.
- 4.2 There is clear reference within the Neighbourhood Plan for the improvement of accessibility at the Needham Market Train Station as mentioned in paragraph 6.3.19, and also the justification for the “much needed” financial investment in transport infrastructure.
- 4.3 Taylor Wimpey agrees with Policy NM9 which looks at Reducing and Managing the Impact of Traffic, by supporting development proposals which promote or introduce measures to minimise the effects of through traffic in the town centre.
- 4.4 It is also noted that previous versions of the Neighbourhood Plan have articulated a long-term aspiration in the provision of a link road / relief road across the River Gipping Valley to south of Needham Market, for the benefit of the Town.
- 4.5 One of the key access ways into Needham Market is via the A14 and the Coddendam Road (B1078), which is impeded by a railway bridge which has a height limit of 2.5m and prevents HGVs and other large vehicles from accessing the town via that route. There is a high risk of the bridge being struck by inappropriate vehicles, which could (and does) result in: the bridge being damaged; road closures; and closure of the main railway line between Norwich and London.
- 4.6 The Neighbourhood Plan and Town Council understands that this is a primary reason why Needham Market has not been identified for further housing allocations within the emerging Joint Local Plan.
- 4.7 It is noted that the Neighbourhood Plan indicates the potential cost of building a relief road, whilst acknowledging that support would be required from both the Highways Agency and Suffolk County Council. It should also be noted that developers, and especially national housebuilders, could also assist and contribute to such infrastructure.
- 4.8 The Neighbourhood Plan wishes to maintain a long-term commitment to further consideration of a potential relief road, particularly if major development is to be proposed in subsequent rounds of strategic planning policy making at the District Council level.
- 4.9 Taylor Wimpey agrees with the Town Council in paragraph 6.5.7 (1), that there is currently no agreed mechanism for delivering this relief road.
- 4.10 Taylor Wimpey also agrees with the Town Council that the redevelopment of brownfield sites in isolation rarely deliver meaningful contributions or improvements to infrastructure.
- 4.11 It is also noted that there is no specific education, healthcare or HWRC infrastructure requirements that are being requested of the three proposed allocations, nor are

there specific contributions identified that these allocations must make.

- 4.12 It is therefore questioned how these improvements will be achieved, and if enough development is proposed to deliver the necessary contributions sought.
- 4.13 The Taylor Wimpey site east of Barking Road has the ability to be brought forward during the plan period. It is not incumbered by site constraints, nor does it need to address specific identified issues within the Neighbourhood Plan. Therefore, this site has the opportunity to focus any contributions towards other infrastructure requirements the Town may require, in accordance with Neighbourhood Plan Policy NM6 Community Infrastructure.

Summary

- 4.14 There is concern at the absence of how the future infrastructure will be facilitated within Needham Market by the current site allocations.
- 4.15 The Taylor Wimpey site east of Barking Road will be capable of making contributions to the infrastructure identified for Needham Market, in both the Neighbourhood Plan and Joint Local Plan.
- 4.16 Should the Town Council wish to pursue the development of a relief road for Needham Market, Taylor Wimpey suggest that the Town Council should take the lead in undertaking a Masterplan for a future relief road, which will require a joint approach with the necessary landowners and developers, as well as the relevant statutory and non-statutory bodies.
- 4.17 Taylor Wimpey are happy to support and engage with such an approach, should Needham Market Town Council take it forward.

Environment and Landscaping

- 5.1 The Site comprises of a single rectangular arable field, which is located to the south east of Barking Road on the southern edge of Needham Market.
- 5.2 Although the Site is currently not publicly accessible, and there are no identified routes on the definitive PROW map and there are no signs for permissive paths, there does appear to be an established walking route through The Site.
- 5.3 Neighbourhood Plan Policy NM10 actively encourages safe walking and cycling.
- 5.4 It is therefore considered that the land east of Barking Road has the opportunity to formalise these non-established walking routes, which would help to improve connections and promote safe walking and cycling, as per the requirements of the Neighbourhood Plan.
- 5.5 The key landscape features of the Site are confined to the boundaries which include the hedgerow along Barking Road, together with the trees and hedgerows along the eastern and southern site boundaries.
- 5.6 As previously stated, it is acknowledged that The Site lies within Barking Parish, just outside the Needham Market Neighbourhood Development Plan (NDP) boundary.
- 5.7 As part of the Neighbourhood Plan evidence base, a report titled 'Development Framework and Design Guidelines for Future Growth at Needham Market' was published in November 2020.
- 5.8 The document identifies a large area of future growth which wraps around the southern and western edges of Needham Market incorporating the route of the potential relief road on the western edge.
- 5.9 The Site lies directly opposite this potential growth area as identified within the document. Development at the Site would be well related to this growth area and would represent a logical extension to it.
- 5.10 In November 2020 BMSDC published a Landscape Sensitivity Assessment, undertaken by Land Use Consultants (LUC) of SHELAA Sites. The Site was assessed under reference SS0170 for potential residential development.
- 5.11 Overall, the study concluded that the Site is of moderate landscape sensitivity. Its sloping landform and slightly raised position above Barking Road are stated as elements which increase its sensitivity and provide a rural setting to Needham Market. Factors which decrease its sensitivity are stated as the lack of semi-natural or heritage features on the Site and the impact of traffic along Barking Road.
- 5.12 At present The Site lies within a Special Landscape Area, which is currently designated by a Saved Policy in the Adopted Local Plan, although the designation criteria is not being carried forward into the Emerging Joint Local Plan.

- 5.13 Other than this current local designation, The Site is not subject to any statutory or non-statutory designations for landscape character or quality.
- 5.14 The Site is not therefore considered to be part of a Valued Landscape for the purposes of the National Planning Policy Framework (NPPF) Paragraph 170.
- 5.15 The site is reasonably well contained, with views generally restricted to vantage points in the site's immediate vicinity and locations in the wider landscape to the north west. It is located on the settlement edge, with some built form to the north, north west and south.
- 5.16 As part of developing the site, a landscape and visual impact assessment would be undertaken and would be used to guide the extent and placement of the developable area and proposals for mitigation for landscape and visual effects.

SUMMARY

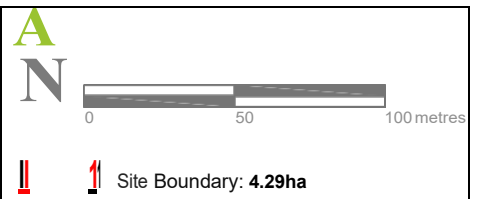
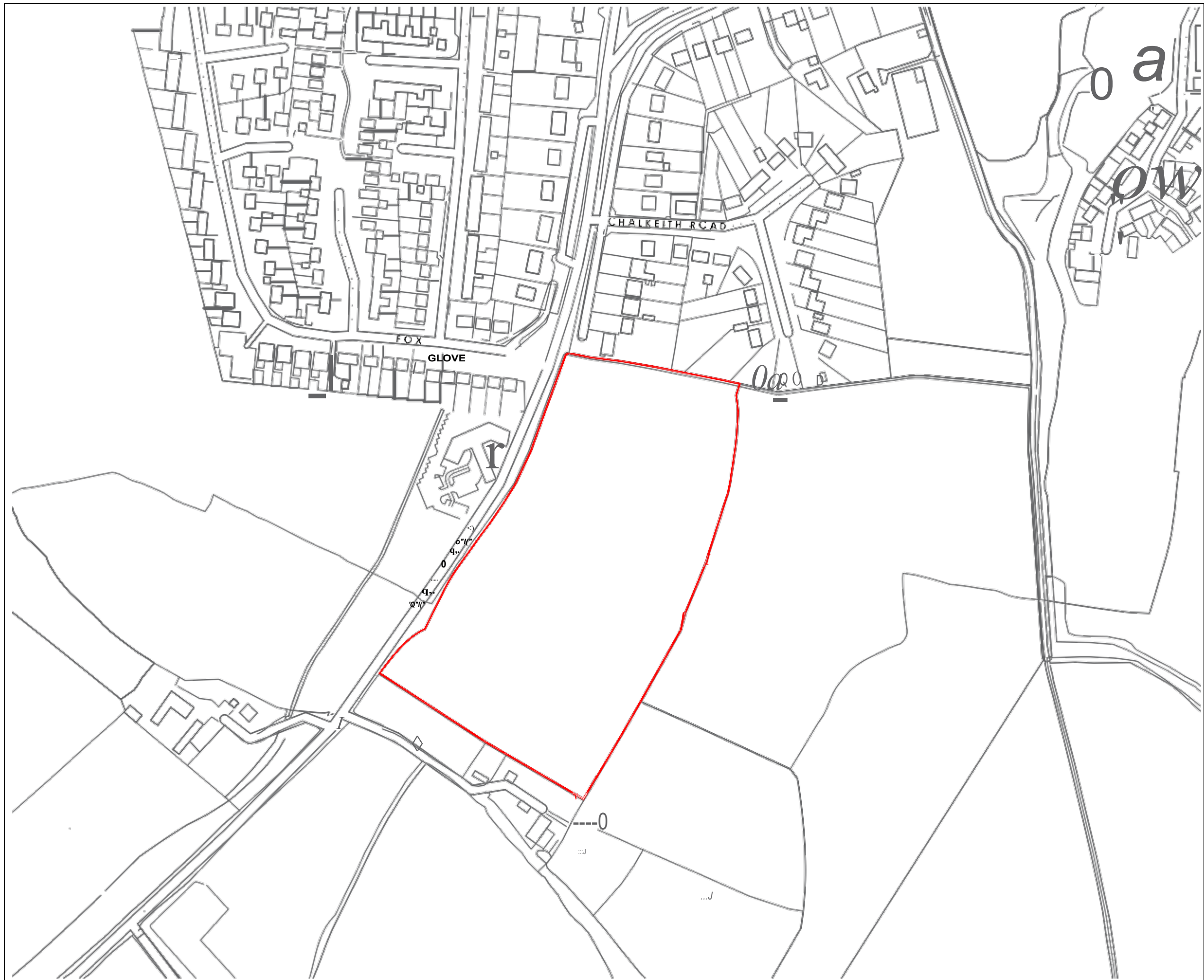
- 6.1 Needham Market is an important and highly sustainable town in Mid Suffolk.
- 6.2 The Needham Market Neighbourhood Plan appears to rely on the BMSDC Joint Local Plan for its housing allocations, which comprise of brownfield sites, with existing planning permissions, within the existing settlement boundary.
- 6.3 The Neighbourhood Plan should consider aligning its housing figures and plan period with that of the BMSDC JLP to 2037.
- 6.4 It appears there is no strategic growth planned for Needham Market beyond 2028.
- 6.5 The idea of a relief road to the south of Needham Market is supported by Taylor Wimpey.
- 6.6 However, there are concerns over the delivery of necessary infrastructure for Needham Market, given the above situation with housing and strategic growth.
- 6.7 Taylor Wimpey agrees with the Town Council that there is currently no mechanism for delivering a relief road for Needham Market at present.
- 6.8 It is recommended that the Town Council should look to pursue the development of a relief road for Needham Market, by leading a Masterplan Approach that engages with necessary landowners and relevant statutory and non-statutory bodies.
- 6.9 The Town Council should consider allocating sites within the Neighbourhood Plan.
- 6.10 Taylor Wimpey have been promoting the land to the east of Barking Road for 120 dwellings, through various District Council consultation exercises.
- 6.11 The Site should be considered as a reserved site should emerging allocations failed to be delivered, or if further growth is needed for the Town.
- 6.12 The land east of Barking Road will be able to make the necessary contributions to the infrastructure identified for Needham Market in both the Neighbourhood and Joint Local Plan.



James Bailey
PLANNING

APPENDIX ONE: Site Location Plan





Site Boundary: 4.29ha

Rev	Date	By	Description

CSA
 environmental
 Dixies Barns, High Street,
 Ashwell, Hertfordshire SG7 5NT
 01462 743647
 ashwell@csaenvironmental.co.uk
 csaenvironmental.co.uk

Project Barking Road, Needham Market

Title Site Location Plan

Client Taylor Wimpey Strategic Land

Scale 1:2500@A3 **Drawn** RC

Date Dec 2020 **Checked** RR

Drawing No. CSA/39 19/ 104 **Rev**



James Bailey
PLANNING

APPENDIX TWO: Proposed Masterplan





- Site Boundary: 4.29ha
 - Proposed vehicular and pedestrian access point
 - Proposed developable area: 2.66ha (approximately 100 dwellings @ 37.5 dph)
 - Proposed public open space
 - Proposed location for children's play provision
 - Proposed location for sustainable drainage features (SuDS)
 - Proposed spine street through the new development
 - Proposed secondary roads within the development
 - Proposed pedestrian and cycle link
 - Proposed pedestrian and cycle routes
 - Existing bus routes and bus stops
- Potential constraints**
- Contours
 - Existing vegetation
 - Surface water flooding (Source: gov.uk)
 - Flood Zone 3 (Source: Environment Agency)
 - Existing overhead high voltage electricity cables
 - Existing underground medium pressure gas main
 - Existing underground BT cables

Planning Application Ref: 3153/14
 Development of up to 266 residential dwellings (currently under construction)

Planning Application Ref: DC/20/05046
 Outline App for 279 No. Dwellings (100 aff. dwellings) and access.

New hedgerow planting to assist in filtering the views of the proposed development where there is currently a gap in the existing vegetation.

Proposed dwellings should be orientated to overlook the areas of public open space around the Site.

Potential for the south western corner of the Site to remain undeveloped and form a green gateway into Needham Market upon approaching from the south west.

Doctors surgery and pharmacy

Existing route of overhead 11kv electricity cables. The opportunity exists to reroute the cables underground within the proposed layout.

Potential vehicular access point to be taken from Barking Road in an area which is located outside of Flood Zone 3.

Potential location for a children's play area.

Proposed location for a drainage feature at the low point of the Site.

1a	Dec 2020	CE	Local Context updated
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Rev	Date	By	Description
-----	------	----	-------------

CSA
 environmental

Dixies Barns, High Street,
 Ashwell, Hertfordshire SG7 5NT

t 01462 743647
 e ashwell@csaenvironmental.co.uk
 w csaenvironmental.co.uk

Project Barking Road, Needham Market

Title Concept Masterplan

Client Taylor Wimpey Strategic Land

Scale 1:2500 @ A3 **Drawn** RC

Date Sept 2019 **Checked** RR

Drawing No. CSA/3919/100 **Rev** -



James Bailey
PLANNING





***Ipswich and East Suffolk
Clinical Commissioning Group***

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk, IP1 2BX

28/01/2021

Dear Sir/Madam

Needham Market Neighbourhood Plan

Page 33 paragraph 6.3.9

The CCG would like to reiterate that it is aware the previous structure provided a service that was insufficient with regards to planning ahead for growth but this is no longer the case, as the CCG is now in control of all aspects of primary care health planning. The CCG would like the statement at the top of the paragraph to reflect this change, to inform that a great deal of work is being done between Babergh and Mid Suffolk District Council, the surgery partners and the CCG Estates team in planning ahead.

The CCG consults with Babergh and Mid Suffolk District Council regularly and has created an infrastructure Delivery Plan as part of our consultation work on the Local Plan. We are aware of all the developments proposed in the area of Needham Market and planning is underway as part of creating a primary care estates strategy. Work has begun between the council infrastructure team and the CCG looking at proposed growth in the JLP along the A14 corridor, (of which Needham Market falls into) and work is ongoing at looking at collaborative endeavours into the future. Although we are aware of the developments proposed and calculations have been done to project the number of patient increase we are anticipating, the recruitment of GPs and GP staff must coincide with any building work and this is currently a national issue. The CCG welcomes the chance to work with the Town Council on the topic of health in the town along with the district council and other healthcare providers.

If you have any queries or require further information, please do not hesitate to contact me.

Kind Regards

Chris Crisell
Estates Project Manager
Ipswich and East Suffolk Clinical Commissioning Group