

Comments from the SnOasis Parish Alliance on the SnOasis Reserved Matters Application No: 4494/16 (SPA) 23rd June 2017

Ecology

Comment 1	The developer still does not have a license for the wildlife mitigation plan despite a decade in which to do so. It is essential that the developers obtain approval for their mitigation plans as soon as possible and obtain an appropriate license from Natural England.
Comment 2	The mitigation plan timescales show a 6 month window from the start of phase 1 to the start of phase 2. This implies that the mitigation areas will be fully in place and stocked with wildlife before operations begin in main quarry. - mitigation involves stripping several metres high nutrient fertilised topsoil from the surface to create a low nutrient chalk grassland with the creation of 46 new ponds suitable to be an alternative to the main construction area. 6 months is wholly unrealistic for this to occur, Natural England and Suffolk Wildlife Trust's estimates to the Public Inquiry were in the region of 5-7 years for sufficient maturity of the chalk grassland and ponds to mature sufficiently for the wildlife that is to be moved. How is the developer proposing to meet this timetable ?
Comment 3	Local people are very concerned to learn that New Zealand Pygmy weed (Crassula), a notifiable plant (Schedule 9 of the UK Wildlife and Countryside Act 1981), is present in the development site that could be spread to surrounding properties through vehicles leaving the site. It is essential that a robust bio security plan is in place before construction commences.
Comment 4	It is understood that requests have been made to the Planning Department relating to the Environmental Impact Assessment (EIA) Scoping Report (Ecology Section 5.2) and the request of assistance from the Suffolk Wildlife Trust. It has been requested that an up to date report is made but there are no reports available. As this site is deemed to have a high ecological value the assessment is paramount. When will the reports be available ?

Site security and access

Comment 1	The plans have little detail on site security and access matters. Two entrances are shown, one on Gt Blakenham and the other at Baylham Stone. The road at Baylham Stone is quite unsuitable for anything other than the lightest traffic, being a single-track C-class road with minimal passing places. It is essential that restrictions be placed on usage of this entrance and all construction and visitor traffic must be prohibited.
Comment 2	If it is intended that this western entrance is to be restricted to emergency purposes only, we do not understand why its location has been moved further away from the B1113, surely the shortest route is the most desirable from everyone's point of view. As a minimum, the developer must pay for improvements to the road surface and the addition of properly constructed passing places at appropriate intervals.
Comment 3	The site is to be secured by fencing but it is unclear what type of fencing is to be used. Only the fencing around the mitigation areas is described. While site security is important, the visual appearance in the Special Landscape Area is very important. All such fencing should be screened by appropriate planting of hedges and no permanent security lighting permitted.

Alternative Site Usage

Comment 1	The analysis of alternatives is flawed. It essentially concludes that that a ski centre is the only viable option for the site and if it is not built, the site will remain brownfield for the foreseeable future. This is simply not correct and does not take account of the changing priorities of the county. Suffolk already has a successful tourism industry but as is typical of this sector, incomes are below national averages. Suffolk needs more, better paid jobs and more housing. Most of the site is not deep quarry, it is levelled, landscaped lakes and grassland making it an attractive site for mixed high tech businesses and housing. Such an option would be much more in keeping with local economic needs, would be visually much more acceptable to local people and would minimise impacts on resources such as roads.
-----------	--

Visual appearance

Comment 1	The documents state that the buildings are in the "Suffolk and Alpine vernacular" of wooden clad, box-like structures with modern metal roofs. Such a style does not exist anywhere and is out of keeping with the Suffolk landscape. The predominant roofing for Suffolk buildings is tile or thatch, typically red clay pantiles for farm buildings - sectional metal roofs are neither common in Alpine regions or in Suffolk. The drawings of the building neither show architectural flair or attractiveness, being simply cheap box-like industrial buildings clad in timber giving them some nod to a Suffolk or alpine style. The building designs should be rejected in favour of more pleasing structures of genuine architectural merit, in keeping with the style of this part of Suffolk and helping to enhance, not degrade the Special Landscape Area which they abut.
Comment 2	It is recognised that the ski dome does not lend itself to conventional "Suffolk or Alpine vernacular architecture". Nonetheless it is highly uncharacteristic of rural Suffolk and we request that the developer makes all possible efforts to ensure that it is as unobtrusive on the skyline as possible.
Comment 3	The planning submission illustrates a number of possible coverings for the ski slope and dome, but does not indicate which one is actually proposed. We strongly urge that it should that the developer makes all possible efforts to ensure that it is as unobtrusive on the skyline as possible. We suggest they should also be non-reflective and designed to blend with the sky as far as possible, rather than stand out. The incinerator plant at Great Blakenham is a good local example of sensitive rendering.
Comment 3	We believe the ski dome should not be purposely lit externally and reflected light should be minimised, as described in our response section covering Lighting
Comment 4	Any aircraft warning lights sited on the dome should be of the minimum intensity allowed by the regulations at 200 calenda, as at the nearby Suez plant.
Comment 5	The ski dome should not carry any advertising material or logos. The aim should be to minimise its obtrusiveness on the surrounding landscape.
Comment 6	The boundary fences must not be lit in order to prevent disturbance to wildlife.
Comment 7	The proposals show other buildings rising 20 meters or so above the highest point of the site. We request that the developer makes all possible efforts to ensure that it is as unobtrusive on the skyline as possible. We suggest they should also be non-reflective and designed to blend with the sky as far as possible, rather than stand out.

Transport

Comment 1	The decision to abandon the building of a railway station, as required by the Secretary of State as a pre-requisite to building Snoasis, is most regrettable. Had the developer retained sufficient land in the former cement works site to build a station rather than selling it for housing, such a station design could have allowed for through trains not to be impeded and jeopardising Network Rail's plans for speeding up services to London. Why was this allowed to happen ?
Comment 2	Loss of this amenity is very significant for local people; in fact it was the only positive aspect of the entire scheme for many of them. Simply substituting a bus service from Stowmarket station is an unacceptable alternative to this environmentally positive asset that was designed to reduce, not increase traffic congestion in the surrounding area. Why is the proposed bus service not from Ipswich ? This would give greater reach on the rail network) and would also bring a positive and lasting benefit to the local community.
Comment 3	Since the Secretary of State made his determination in 2008, that a railway station was an essential pre-requisite, the traffic situation has further deteriorated. Over 2000 new houses are either built or approved in a five mile radius of the site, a major energy from waste plant has opened adjacent to the site and traffic on the A14 increased considerably.
Comment 4	<p>If a station is indeed now not feasible given the small land area in which to build it, the investment that would have taken place to build it must be transferred into additional road improvements over and above this required in Section 106 agreements that have not been rescinded by MSDC. Chief among these must be:</p> <p>Improvements to the A14 at junctions 52 (Claydon) and 55 (Copdock) to provide dedicated slip lanes that avoid queuing at the roundabouts.</p> <p>It would be helpful if we could understand the logic and decisions that were made not to listen to the Parish Councils that the north bound dual carriage way leading to the A14 is still left lane for left turn and all other routes in the right hand lane. This is compounded by the reluctance to let traffic turn right at the light controlled junction towards Bramford and Sproughton.</p> <p>Improvements to the B1113, roundabouts at both the entrance to Snoasis and the junction with the dual carriageway leading to the A14</p> <p>Consideration to the 6 junctions that will sit within a few hundred yards or each other with 4 that are almost solely used by HGV's and the impact on traffic flow along the only route from Needham Market and the southern villages along the valley.</p> <p>Passing places and surface improvements to the unnamed single track road at Baylham that are proposed to carry emergency vehicles access to Snoasis.</p> <p>Why have changes to Hackneys Corner traffic priorities not been considered despite being in the original plans to alleviate an accident hot spot at the junction with Stowmarket Road ?</p>
Comment 5	Does MSDC Planning Dept. actually consider the impact of further developments when looking at the road network impact analysis for SnOasis? Developments in and along the B1113 to Needham Market (quarry housing, industrial estate and Stowmarket Road development) all contribute heavily to the additional loading of the roads.
Comment 6	SnOasis cannot be economically justified within the immediate local catchment area, and for it to be financially viable, it must inevitably seek custom from a much wider geographical area. There are serious questions over the ability of the local road infrastructure to cope with the increased traffic and the and it will place a heavy burden on the whole infrastructure. Why has MSDC not insisted on the developer funding improvements to the road network ?

Planning Enforcement	
Comment 1	MSDC are responsible for enforcing the various conditions and Section 106 agreements on the developer. A huge half billion pound development will require a major increase in planning enforcement resources over several years if this is to be meaningful and the developer take them seriously. Onslow Suffolk have a poor track record in this regard over a number of years for example allowing the destruction of wildlife, failure to maintain the site etc. The SPA seeks an assurance that MSDC has planned for adequate budget to appoint a suitably skilled and empowered enforcement team for the duration of the development and beyond.
Financial Bond	
Comment 1	We would like to see the Council imposing a significant bond on the developer to deal with the consequences of business failure of Snoasis. While economics are not a factor in planning decisions, sustainability certainly is. By any measure, SnOasis is a high risk development, being the first of its kind anywhere in the world and with a design of a huge main attraction that has virtually no conceivable alternative uses.
Site illumination	
Comment 1	With reference to 035438 RESERVED MATTERS APPLICATION Artificial Lighting Strategy Report We agree with the above report (para 2.1) that the site and local area should be classified as E1. That is: an “intrinsically dark” natural environment. This emphasises the importance of maintaining minimal direct light from the site and minimising ‘glow’ from above. This view is evidenced by the Campaign for the Protection of Rural England’s 2016 research (“England’s light pollution and dark skies”) showing Mid-Suffolk as the 26th “darkest sky” District of 326 in England
Comment 2	The Institute of Lighting Professionals’ Guidance Notes for Reduction of Obtrusive Light (GN01:2011) outlines the factors to consider in trying to achieve this. This guidance is not mandatory but is considered best practice in the industry. In considering sky glow, however, it refers only to Direct Upward Light from luminaires and ignores the effect of Upward Reflected light from surfaces. The latter is clearly dependent on weather conditions, humidity etc.
We believe attention to a number of design details in the Artificial Lighting Strategy Report would improve the Reflected Light situation:-	

Comment 3	<p>1. The Bobsleigh Run. Figures 4-4 to 4-6 show lighting angled to illuminate horizontally rather than downwards. This is evidenced by the extent of light shown reflected from the ski dome. We suggest the lighting should be angled downward to reduce this reflection. Since this is an external feature we suggest light levels be kept to a minimum compatible with safe use of the facility. Standard BS EN 12193:2007 Table A.28 recommends different lighting levels according to the use of the facility:</p> <p>Lighting Class I: Top level competition such as international and national competition which will generally involve large spectator capacities with long potential viewing distances. Top level training can also be included in this class. 300 Lux</p> <p>Lighting Class II: Mid level competition such as regional or local club competition which generally involve medium size spectator capacities with medium viewing distances. High level training can also be included in this class. 200 Lux</p> <p>Lighting Class III: Low level competition such as local or small club competition which generally do not involve spectators. General training, physical education (school sports) and recreational activities will also come into this category. 50 Lux</p> <p>We presume that the Snoasis facility is class III, given the lack of spectator provision. Hence we seek assurance that the run is not being over illuminated for it's planned use.</p>
Comment 4	The Ice rink (Figure 4-28). It is unclear what material is intended for the roof. Should it be translucent it will contribute significantly to sky glow. We therefore suggest it should be completely opaque to remove any light leakage.
Comment 5	Tiered car-parking (Figures 4-32 and 4-33) is shown to the south of the ski slope/dome with all luminaires on 6m high columns. We suggest that lower columns will be adequate on the higher tiers, since spill light onto lower tiers will be unnecessary.
Comment 6	Ski Dome (Figures 4-8 and 4-9). This is in effect a light tube – being brightly lit inside and with snow and white-painted walls. If the upper end-face is transparent, as appears to be the case, reflected light as well as direct light will issue out to the surrounding atmosphere yielding significant scope for glow. We suggest that motorised brise-soleils be installed across the end face. These will allow control of heat gain by day, and should be engineered to completely block out the end glass wall at night to avoid any light spill into the surrounding atmosphere.
Comment 7	Maintenance factor. The performance of luminaires degrades over time reducing light levels and so to achieve desired light levels throughout the life of the facility, the initial values must be correspondingly increased. The proportional reduction (the maintenance factor) is dependent on a number of variables, however the report does not indicate what maintenance factor has been used in this case. We suggest this be clearly stated and justified to avoid unnecessary 'over-lighting'.
Comment 8	Overall site lighting must be reduced at the time the site facilities are closed.
Comment 9	What will the definition of "intrusive lighting" be ?
Disturbance	
Comment 1	The proposal for set closing times for the site facilities is welcome. We support this, but would welcome details of MSDC's enforcement plans for this.

Comment 2	What proposals are there for noise mitigation for the site - during construction work, during normal operations and during special events e.g. concerts ?
-----------	---

Footpaths

Comment 1	The Community Woodland is a welcome addition as are the permissive paths. It would be helpful to clarify the duration of any agreement. We would expect it to be for the lifetime of the Snoasis Resort. Whilst accepting that the landowner would have the right to close the paths if necessary, this should be kept to an absolute minimum and full public access maintained. However our preference would be for full public rights of way to be established.
Comment 2	One of the permissive paths provides an entrance into the Community Woodland from arable land to south. This is welcomed since it has the potential to link the permissive paths to the local public rights of way network via a connection to FP4 Nettlestead. Care must be taken to ensure that the Snoasis resort land directly abuts the route of Footpath 4 and can therefore connect without leaving a gap. Should there be a gap, it will need to be bridged by an agreement with the neighbouring landowner.
Comment 3	Whilst the proposed entrances are appropriate and connect well to the community at Baylham Stone and the existing public rights of way network to the south and west, it would be helpful to have an additional entrance further to the east along the northern side of the site. This would provide enhanced connectivity to the bridleway running to Great Blakenham, involving less road walking. It should be remembered that connecting paths between Nettlestead/ Little Blakenham and Great Blakenham/Baylham were extinguished prior to the site being used for quarrying. Restoration of that lost connectivity should be considered a priority.
Comment 4	Surfacing of the paths should strike a balance between reflecting the natural habitat of native woodland with the provision of a well-drained and even surface. Exits onto the highway should provide suitable barriers to prevent off-road motorcycles from using the paths.
Comment 5	Why is there no mention of the Section 106 footpath around the site perimeter ?
Comment 6	There is a footpath going through the mitigation area. Why has no mention been made of diverting this to prevent disturbance to wildlife ?

Piling

Comment 1	Residents of Baylham in the immediate vicinity of the site are very concerned about the noise and disruption caused by vibration piling. There is at least one Grade 2 listed farmhouse only a few hundred metres from the site and many more old buildings with minimal foundations that may be badly impacted by this. Why is such an unacceptable technique proposed when suitable silent and vibration-free techniques exist. (e.g. screw piling) ?
-----------	---

Sewage

Comment 1	The developer is proposing to deal with all the sewage from the site by pumping it into the main sewer for the Cliff Quay catchment. This sewer is already at full capacity and there are no proposals in place for improvements to it. Proposals to improve the sewer should be drawn up and then be sent to the relevant authority for approval. These should be put in place before the site opens.
-----------	--

Surface/storm water

Comment 1	The proposals for this lack clarity and detail. The site is divided into five areas and it states that Area1 will go to local discharge but does not state exactly where the surface water discharge point is planned to be. The flow rate is assumed to be 4.6 litres per second per hectare. The area is unknown, so it is impossible to calculate the flow rate going to this point. However, it is clear that this is a very large amount of water to be discharged during spells of heavy rain. More details must be given.
Comment 3	The developer states that some of it will go into soakaways, but has not clearly specified the amount that will be sent into soakaways (which are known to fail). The developer has not demonstrated that the soakaways would be able to cope at the maximum expected flow rate to be discharged. The main ditch for discharge of surface water from the site runs down to Little Blakenham. This ditch has a number of limited flow points and too much water being sent into it from the site presents a threat of flooding to properties in the Beeches and also a risk to residents. There should be a condition attached to any agreement that, if the soakaways are overwhelmed, there will be no pumping of water out of the soakaways into local ditches.
Comment 2	The developer proposes to relocate 80% of the material excavated during construction on the site itself., but gives no further details. This could have an impact on surface water drainage and the developer should be required to give further information this.

Ground water

Comment 1	The soakaways could present a risk of contamination to local boreholes which supply a number of private houses in the area of the site. There is also a risk of contamination from the base of the ski slope being located ten metres underground. This is a concern that the developer has not addressed and should be raised by MSDC as a part of their duty of care to local residents.
Comment 2	The soakaways and the location of the base of the ski slope also present a risk of contamination to the Anglian Water pumping station at Baylham. The proposal mentions improvements to the pumping station. These should be clarified and assessed by Anglian Water before any approval and must be in place before the site opens.

Sustainability

Comment 1	The development does not appear to meet any of the tests for sustainable development outlined in the National Planning Policy framework. The draft NPPF defines sustainable development as : "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their
Comment 2	There will be a huge impact, on both the parishes closest to the site, but also on a much wider area in the Gipping Valley and around Ipswich. The site will generate enormous amounts of extra traffic, cause loss of a significant natural habitat and also put extra pressure on already overstretched local resources and infrastructure. We request that further consideration is given to the sustainability of the project and the environmental degradation
Comment 3	The original reports for the project were produced over ten years ago. For example, the estimates of traffic movements made ten years ago, and made with the benefit of a percentage of customers arriving by rail, are now out of date and increasingly irrelevant as the Great Blakenham railway station application is no longer linked to SnOasis Reserved Matters. We seek confirmation that all the reports and surveys have been updated and that the proposals are based on recent data.

Comment 4	Consideration should be given to the changes in the local population over the last ten years. Are the needs of the public of Suffolk the same as they were ten years ago ?
Comment 5	Sustainability should also include an aspect of environmental gain, and to a certain extent the SnOasis development would do this, from a brown field site to a built environment of leisure activities and holiday accommodation. However, there is considerable loss of natural habitats which the current proposals do not adequately mitigate. What plans to MSDC have to ensure that the developer delivers an adequate mitigation strategy ?
Comment 6	Why does MSDC not consider the cumulative effects of the large number of planning application - approved and pending - in the area ? The high level of developments in the area are putting pressure on resources and infrastructure and increasing the failure of MSDC and developers to deliver sustainable development.