

# Comments for Planning Application 1832/17

## Application Summary

Application Number: 1832/17

Address: Land To The West Of Old Norwich Road And To The East Of The A14 Claydon

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

Case Officer: Ben Elvin

## Customer Details

Name: Mrs Suzanne Eagle

Address: Valley View, Church Lane, Claydon Ipswich, Suffolk IP6 0EG

## Comment Details

Commenter Type: Parish Council

Stance: Customer objects to the Planning Application

Comment Reasons:

- Boundary Issues
- Conflict with local plan
- Drainage
- In Conservation Area
- Inadequate Access
- Landscape Impact
- Loss of Open Space
- Loss of View
- Out of Character
- Sustainability
- Traffic or Highways
- Wildlife

Comment: Claydon & Whitton Parish Council objects to this application for the following reasons:-

1. Whitton Rural, where the land on the application is situated, such a large development would be totally out of character in this rural area and the community will lose its identity.
2. Loss of village status. Claydon/Barham's character is that of a village and building 315 houses in the agricultural belt between Ipswich and Claydon will blur the boundaries and set a dangerous precedent.
3. Old Ipswich Road must not under any circumstances be opened up as this will create a major traffic problem in Claydon. This road remaining closed retains the rural independence of Claydon/Barham from the Ipswich conurbation.
4. Increase in traffic. According to the developers own report the Bury Road junction (A1156) is set to exceed capacity by 2022. This takes no account of the many developments still at planning

stage or the revitalised Anglia Retail Park, which was virtually empty when they carried out their traffic survey.

5. Overcrowding in schools. With this development, Claydon High School will be the closest and safest school to send their children to. Parents will fight to send their children to Claydon and many will succeed. Can the present schools accommodate this additional influx of students?

6. Any development of this site would limit options for the siting of the northern bypass.

7. This proposed development is not on land designated for building.

8. This proposed development is not within the existing settlement boundary.

9. Effect on traffic through Whitton Conservation area causes environmental concerns.

**From:** Nathan Pittam  
**Sent:** 11 July 2017 09:56  
**To:** X Delete Aug 17 - Planning Emails  
**Subject:** 1832/17. EH - Air Quality.

**EP Reference : 195162**

**1832/17. EH - Air Quality.**

**Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon  
Outline Application (with some matters reserved) - Erection of up to 315  
dwellings, vehicular access to Old Norwich Road, public open ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and can confirm that the likelihood, owing to road configuration, of this development impacting on the air quality of the Mid Suffolk district is negligible. I would though advise that the traffic flow from the site is towards key junctions in the Ipswich district and given the developments that are proposed in the area it might be prudent to establish from Ipswich Borough Council their stance on potential impacts on the Norwich Road junction.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

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**From:** Nathan Pittam  
**Sent:** 11 July 2017 09:48  
**To:** X Delete Aug 17 - Planning Emails  
**Subject:** 1832/17. EH - Land Contamination.

**EP Reference : 195164**

**1832/17. EH - Land Contamination.**

**SH, Street Record, Old Norwich Road, Whitton, IPSWICH, Suffolk.**

**\*Land To The West Of Old Norwich Road And To The East Of The A14 ,  
Claydon\* Outline Application (with some matters reserved) - Erection of up to  
315 dwellings, vehicular access to Old Norwich Road, public ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the Phase I investigation and can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

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## **MID SUFFOLK DISTRICT COUNCIL**

### **MEMORANDUM**

TO: Ben Elvin, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 06.07.2017

YOUR REF: DC/1832/17

SUBJECT: Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon  
Outline Application (with some matters reserved) - Erection of up to 315 dwellings,  
vehicular access to Old Norwich Road, public open space, and associated  
landscaping, engineering and infrastructure works

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**Please find below my comments regarding 'Environmental Health - Other issues' only.**

Thank you for your consultation on the above application. In considering this application, I have had regard to the Acoustic Assessment prepared by Spectrum Acoustic Consultants (Report ref NDT5289/16254/2, issue date 31.10.16).

Since the introduction of the NPPF, we would, when assessing noise impacts, have regard to the World Health Organisation (WHO) Guideline Values for Community Noise and also BS8223:2014 Guidance on Sound Insulation and Noise Reduction in Buildings, both of which are still 'in force' and both of which give guideline values for residential dwellings. A summary of the relevant values are below:

<b>Area</b>	<b>WHO</b>	<b>BS8233:2014</b>
Bedroom (night-time)	30dB LAeq,8hr (to avoid sleep disturbance)	30dB LAeq,8hr (35dB if sleeping during the day)
Living areas (daytime and evening)	35dB LAeq,16hr (to avoid moderate annoyance and preserve speech intelligibility)	35dB LAeq,16hr (dining areas 40dB LAeq,16hr)
Outdoor living areas including Balconies, terraces, garden, patios etc. (daytime and evening)	50dB LAeq,16hr (to avoid moderate annoyance) 55dB LAeq,16hr (to avoid serious annoyance)	50dB LAeq,16hr with 55dB LAeq,16hr acceptable in noisier environments
Outdoor living areas (night-time)	45dB LAeq8hrs (and 60dB LAmax) (to avoid sleep disturbance internally).	-

The assessment details a noise survey which has been carried out on the site and which is also presented by means of noise contour plots (given in appendix C). The assessment identifies that noise from the A14 dominates the whole site and the noise contour plot for daytime shows that the whole site experiences noise levels of about 50dB LAeq, 16hr and that the majority of the area in which residential development is proposed will experience levels of 55-65dB LAeq,16hr which is above the BS8223 and WHO values to avoid 'serious annoyance'. Whilst at night the noise climate is slightly lower, areas of the site where residential development is proposed remain at levels of 50 - 60dB LAeq,8hrs. This is significantly above the WHO and BS8823 levels to avoid sleep disturbance internally. The Assessment identifies that the nearest homes to the western boundary with the A14 would likely experience levels of between 65-70dB LAeq,16hr during the day and 60-65dB LAeq, 8 hr at night. These homes are also likely to experience sporadic noise

levels (from short-term events such as an HGV passby) of up to 83dB LAFmax, which are again significantly above the guideline levels.

The National Planning Policy Framework (NPPF) recommends that planning decisions should be avoided where the perception of noise is noticeable and disruptive and such that it has a significant adverse impact. However, neither the NPPF nor the Noise Policy Statement for England (NPSE) expects noise to be considered in isolation to other social, economic and environmental benefits. PPG also states:

*“The planning process should avoid this (significant adverse effects) occurring, by using appropriate mitigation....” and “Such decisions must be made taking into account the economic and social benefit of the activity...”*

BS8233 states that guideline values should only be exceeded if “*a compromise between elevated noise levels and other factors, such as the convenience of living in these locations or making efficient use of land resources to ensure development needs can be met, might be warranted*”. It is my view that the existing noise climate of the site makes it unsuitable for residential development and such development would thus only be appropriate if you consider there are significant wider social and economic benefits of the development.

It is of note that dwellings, particularly those closest to the A14, will be affected by traffic noise of such an intensity that windows will need to remain shut for all of the time in order to achieve a good internal noise standard for habitation, including sleep. If windows were partially left open it is likely that such noise will have a significant and adverse impact on the internal noise climate of those dwellings, causing disturbance, premature waking and sleep loss.

In mitigation, Section 6 of the assessment details a potential mitigation strategy based on specifying building fabric, glazing type and ventilation being provided by alternative means, such as a whole house mechanical ventilation with heat recovery (MVHR) system. I would find reliance on mechanical ventilation totally unacceptable as this is demonstrative that these parts of the site are clearly unsuitable for residential development. The assessment also states that some plots further into the site may benefit from distance separation, a quiet façade and screening by other properties and thus ‘may well be able to have a lesser mitigation strategy which could include the use of trickle ventilators’ (e.g. natural ventilation).

In terms of external amenity space, the assessment identifies that garden areas of plots nearest the A14 are likely to exceed BS8223 and WHO guideline values. It recommends that gardens and amenity spaces should be orientated so that they are screened by the proposed dwellings – however, no further detail is given in terms of what likely noise levels would be.

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

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

Kind regards

Joanna Hart  
Senior Environmental Protection Officer

From: Iain Farquharson  
Sent: 04 July 2017 10:29  
To: BMSDC Planning Area Team Green  
Subject: M3 195166. Planning Consultation Request - 1832/17

Dear Sir/Madam

We have reviewed the information submitted.

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

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

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

Regards

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027  
[//iain.farquharson@baberghmidsuffolk.gov.uk](mailto://iain.farquharson@baberghmidsuffolk.gov.uk)

**From:**Infrastructure Team (Babergh Mid Suffolk)  
**Sent:**11 Sep 2017 13:07:03 +0100  
**To:**BMSDC Planning Area Team Green  
**Subject:**RE: Planning Consultation Request - 1832/17

Dear Ben,

This development site lies within the high value zone for MSDC CIL Charging, and , if granted planning permission, would be subject to CIL at a rate of £115m<sup>2</sup> (subject to indexation). The CIL Liability is calculated on approval of details submitted under Reserve Matters. The Developer should ensure they understand their duties in relation to compliance with the CIL Regulations 2010 (as amended).

Kind Regards,

Nicola

Nicola Parrish  
Infrastructure Officer

Tel: 01449 724977 (DD) / 4977(Ext)  
Mob: 07720899821

-----Original Message-----

From: planninggreen@baberghmidsuffolk.gov.uk [<mailto:planninggreen@baberghmidsuffolk.gov.uk>]  
Sent: 06 September 2017 16:08  
To: Infrastructure Team (Babergh Mid Suffolk)  
Subject: Planning Consultation Request - 1832/17

Please find attached planning consultation request letter relating to planning application - 1832/17 - Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon ,

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.



Our Ref: IP/17/00552/OPF

Your ref: 1832/17

Please ask for: Carlos Hone

Email: carlos.hone@ipswich.gov.uk

Direct dial: 01473 432917



Mr. Philip Isbell  
Corporate Manager – Growth & Sustainable Planning  
Mid Suffolk District Council  
High Street,  
Needham Market,  
Ipswich  
IP6 8DL

Grafton House  
15-17 Russell Road  
Ipswich Suffolk  
IP1 2DE

www.ipswich.gov.uk  
Twitter: @IpswichGov

7<sup>th</sup> August 2017

Dear Sir,

**Proposal:** Outline Application (with some matters reserved) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works.

**Location:** Land To The West Of Old Norwich Road And To The East Of The A14, Claydon.

Thank you for the opportunity to comment on the above application. The application was presented to the Council's Planning and Development Committee on 26<sup>th</sup> July 2017 and the report can be viewed online here: - <https://democracy.ipswich.gov.uk/mgChooseDocPack.aspx?ID=1919>

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

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

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

Development with a resolution to grant planning permission:-

- 16/0898/FUL - Regional distribution centre comprising 11,508 sq. m of warehousing and 1,850 sq.m of ancillary offices, and associated facilities.
- 16/00969/FPI3 – 60 Dwellings
- 16/00763/FUL – 11 Dwellings

Development sites allocated within the 2017 adopted plan:-

- IP005 – Remainder of the former Tooks Bakery site, Old Norwich Road – Health Centre.
- IP032 – 3.7ha, King George V Field, Old Norwich Road – Residential (approx. 99 dwellings) and amenity green space.
- IP140 – Land North of Whitton Lane - Remainder of allocated site for employment.

In order for any development in this area to be better integrated with existing built form and facilities, it is considered that development should be subject to integration with the settlement of Claydon, whilst also recognising the proximity of Ipswich Borough as a provider of facilities and services. The physical connection between Claydon and the site, and the site and Ipswich needs to be significantly enhanced with footpaths and cycle links shown to form a sustainable link between the two. The proposals seek to direct all traffic to Ipswich and as such, fails to recognise the huge importance of meaningful connectivity between Claydon and Ipswich. It is imperative that this development achieves these aims in order to be considered sustainable.

Cycle and pedestrian links require enhancement between Ipswich town centre and the railway station (beyond the application site boundary). These links will enable the site to promote the use of sustainable modes of transport. Without such linkages, this development will place a huge reliance on the use of private motor vehicles, contrary to the aims of sustainable development.

Ipswich Borough Council raises serious concern regarding the likely significant highway impact resulting from this development should it be approved. The impact on the highway network specifically the junction between Old Norwich Road, Norwich Road, and Bury Road is of specific concern. Concern is expressed as to the ability of the existing network to cater for further traffic given the existing conditions prevalent at most times presently.

Suffolk County Council, as the Highway Authority, will provide detailed comment on this matter, however, it is advised that any transport assessment will need to have regard to other development in the locality which has either a) a resolution to grant planning permission or b) is allocated within the Ipswich Local Plan that was adopted in February 2017. Please see above for specifics.

There is a requirement for contributions towards strategic mitigation in respect of the Stour and Orwell Estuary European Special Protection Area. Under the terms of the Conservation of Habitats and Species Regulations 2010, as amended, there is a legal requirement to provide a Habitats Regulations Assessment of the likely impacts from the development on the protected sites. Ipswich Borough Council is currently working with Babergh DC/Mid Suffolk DC and Suffolk Coastal DC in drawing up a Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA RAM Strategy) which forms a strategy document to enable sustainable housing growth whilst adequately protecting European wildlife sites. It is therefore essential that necessary mitigation of the effects of the development and its associated recreation at the protected areas is agreed by Natural England in order to ensure this development complies with the regulations.

Notwithstanding the five year supply of housing position in Mid Suffolk, any new housing in the Ipswich fringe area needs to be properly integrated with the wider Ipswich area to ensure appropriate infrastructure provision is maximised. Under the current proposals the development would be located within the Mid Suffolk administrative area and will, should outline planning permission be granted, need to provide financial contributions towards necessary infrastructure. These contributions will be necessary to provide/improve the infrastructure that will actually be used by the occupants of the development.

I shall be grateful if you could keep me updated on any significance changes to the application, and once determined please send me a copy of the decision notice.

Yours Sincerely,

**Martyn Fulcher BSc (Hons) PGDip MRTPI**  
**Operations Manager**  
**Planning and Development**

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Date: 3 August 2017  
Our ref: 220526  
Your ref: 1832/17



Mr Ben Elvin  
Mid Suffolk District Council  
Needham Market, Ipswich IP6 8DL

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Mr Elvin,

**Planning consultation:** 1832/17 Outline Application (Access to be considered) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works Land To The West Of Old Norwich Road And To The East Of The A14 Claydon

Thank you for your consultation on the above. 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.

**Insufficient information provided**

There is insufficient information to enable Natural England to provide a substantive response to this consultation as required under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Please provide the information listed below and re-consult Natural England. Please note that you are required to provide a further 21 day consultation period, once this information is received by Natural England, for us to respond.

This development proposal has the potential to affect the **Stour and Orwell Estuaries SPA and Ramsar site** which are European sites (also commonly referred to as Natura 2000 or N2K sites) afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations') and the Stour Estuary SSSI which is notified at a national level.

There are currently concerns for the impacts of recreational pressure on the Stour and Orwell Estuaries, in particular the disturbance of birds for which the sites are in part notified. Natural England considers that housing development (or 'projects' in Habitats Regulations Assessment (HRA) terms) such as this has the potential to increase levels of recreational disturbance to the estuary once the dwellings are occupied by new residents. The birds associated with the estuary are sensitive to disturbance from recreation, in particular off-lead dog walking, and the unique attraction of the estuary presents a strong draw for undertaking such activities.

We therefore advise that a HRA should be undertaken for this development proposal to assess this potential impact and formulate any necessary mitigation measures. We consider that mitigation of such impacts usually requires more than one type of approach; this is typically a combination of 'on-site' informal open space provision and promotion (i.e. in and around the development site) and 'off-site' visitor access management measures (i.e. at the N2K site).

With regards the 'off-site' measures, you may be aware that Babergh District Council, Suffolk Coastal District and Ipswich Borough Councils, have commissioned Footprint Ecology to produce a joint Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). This strategic solution aims to reduce recreational pressures arising from new housing to the designated sites in and around these authorities. Once approved, the RAMS will specify requirements for developer contributions to an agreed and costed scheme of measures to help avoid and mitigate such impacts to those designated sites scoped in to the RAMS (which includes the Stour and Orwell Estuaries) over the respective local plan periods. Although this proposed development is in Mid Suffolk and so outside the above local authority boundaries, it is within the 13 km zone of influence for recreational impacts, as identified through the recent RAMS work. Therefore, in line with our recent interim advice letter to the above authorities (our ref: 218775, dated 22<sup>nd</sup> June 2017), we advise that it would be appropriate for a suitable financial contribution to be secured for this application as part of the HRA mitigation package.

Please note that we are not seeking further information on other aspects of the natural environment, although we may make comments on other issues in our final response.

On receipt of the information requested, we will aim to provide a full response within 21 days of receipt. Please be aware that if the information requested is not supplied, Natural England may need to consider objecting to the proposal on the basis of potential harm to the above designated site.

Should the developer wish to explore options for avoiding or mitigating effects on the natural environment with Natural England, we recommend that they use our [Discretionary Advice Service](#).

Please send further correspondence, marked for my attention, to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) quoting our reference 220526.

Yours sincerely,

John Jackson  
Lead Adviser  
Norfolk & Suffolk Area Team  
Natural England  
Dragonfly House, 2 Gilders Way  
Norwich, NR3 1UB



6 July 2017

Ben Elvin  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market  
Ipswich  
IP6 8DL

By email only

Hi Ben

**Application: 1832/17**

**Location: Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon**

**Proposal: Outline Application (with some matters reserved) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works.**

Thank you for consulting Place Services on the above application.

**No objection subject to conditions to secure:**

- A) A proportionate financial contribution towards visitor management measures for the Stour & Orwell Estuaries SPA/Ramsar.**
- B) Ecological mitigation and enhancements:**

The site lies within the 13km Zone of Influence (ZOI) for the Stour & Orwell Estuaries SPA/Ramsar so Natural England's revised interim advice to ensure new residential development and associated recreational disturbance mitigation for designated site impacts is compliant with the Habitats Regulations 2010 (as amended) applies. The LPA is therefore advised that a contribution should be sought from residential development within the 13 km ZOI specified.

The report of ecology & protected species surveys (Tim Smith, April 2017) includes sufficient ecological information available to understand the impacts of development on Protected eg badgers and Priority species, particularly reptiles & skylarks.

However as the report is not certain of the impacts on hedgerows at Outline stage, any predicted losses at Reserved Matters stage will trigger additional survey & assessment for Dormouse and the provision of any replacement hedgerow and other planting as mitigation.

There will be a need to provide offsite mitigation for impacts of development on skylarks (2 breeding pairs were identified in the ecological report).



Should the LPA be minded to recommend approval of the scheme, I recommend conditions to secure protection for birds during the construction period and the other recommendations in the ecology report, with an external lighting scheme which needs to be sensitive to bats. I also support the reasonable biodiversity enhancements for appropriate bird boxes eg swift, house sparrow and starling as reasonable as well as hedgehog friendly fencing throughout the development .

### **Recommendations**

The mitigation measures identified in the ecological report (Tim Smith, April 2017) should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, reptiles, hedgehogs and breeding birds.

Impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

Submission for approval and implementation of the details below should be a condition of any planning consent.

#### **I. CONCURRENT WITH RESERVED MATTERS OF ANY PHASE: COMPLIANCE WITH ECOLOGICAL REPORT RECOMMENDATIONS**

*"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological report (Tim Smith April 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination."*

**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

#### **II. CONCURRENT WITH RESERVED MATTERS OF ANY PHASE: SKYARK MITIGATION STRATEGY**

*"A skylark mitigation strategy shall be submitted for approval and implemented in full to mitigate the loss of nesting habitat."*

**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

#### **III. CONCURRENT WITH RESERVED MATTERS OF ANY PHASE: REPTILE MITIGATION STRATEGY**

*"A reptile mitigation strategy shall be submitted for approval and implemented in full to mitigate the loss of habitat."*

**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)



**IV. CONCURRENT WITH RESERVED MATTERS: PROTECTION OF BREEDING BIRDS DURING CONSTRUCTION**

*"No removal of hedgerows, trees or shrubs or dense vegetation that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority."*

**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

**V. CONCURRENT WITH RESERVED MATTERS: FURTHER SURVEYS FOR DEVELOPMENT PHASED OVER A PERIOD OF TIME**

*"Prior to commencement within a development area or phase, further supplementary ecological surveys for breeding birds and reptiles shall be undertaken for the land affected by that phase or area, to inform the preparation and implementation of corresponding phases of ecological measures required. The supplementary surveys shall be of an appropriate type for the above habitats and/or species and survey methods shall follow national good practice guidelines."*

**VI. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME**

*"Prior to occupation, a lighting design scheme for biodiversity" shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory."*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

Please contact me with any queries.  
Best wishes

**Sue Hooton CEnv MCIEEM BSc (Hons)**  
Principal Ecological Consultant  
Place Services at Essex County Council  
[sue.hooton@essex.gov.uk](mailto:sue.hooton@essex.gov.uk)

**Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils**  
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.





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

18/09/2017

For the attention of: Ben Elvin

**Ref: 1832/17 Land to the West of Old Norwich Road and to the East of the A14, Claydon.**

Thank you for re-consulting us on the outline application for the erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works (with some matters reserved).

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site. Initial recommendations were submitted for this application on the 05/07/17. Based on these recommendations, further information has now been provided. This includes a Landscape Strategy and amendments to the Landscape and Visual Impact Assessment (LVIA).

## **Recommendations**

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

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

## **Review of submitted information**

The Landscape Strategy provides details on hard and soft landscape materials, access and movement and play spaces. All of which are adequate for this stage in the planning process. However, it would still be advised that visualisations are provided to give a better understanding of how the development will be incorporated into the surrounding landscape.

The LVIA now includes a map of the Zones of Theoretical Visibility. The zone extends across a large area of land due to the undulating topography. Therefore extensive mitigation measures need to be included in the design. This could include further soft landscaping features and certain material choices that complement the surrounding context.

Yours sincerely,

Ryan Mills BSc (Hons) LMLI  
Landscape Consultant  
Telephone: 03330320591  
Email: [ryan.mills@essex.gov.uk](mailto:ryan.mills@essex.gov.uk)

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.





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

07/07/2017

For the attention of: Ben Elvin

**Ref: 1832/17 Land to the West of Old Norwich Road and to the East of the A14, Claydon.**

Thank you for consulting us on the outline application for the erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works (with some matters reserved).

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

### **Recommendations**

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

- 1) A landscape strategy needs to be produced which demonstrates how the proposal links with the surrounding residential and movement network, in order to create an appropriate public realm and provide suitable levels of amenity space. The submitted illustrative masterplan (Ref: Illustrative Landscape Masterplan) fails to show this to the adequate level of detail. The submitted landscape strategy should include the following sections:
  - a. Context and character
  - b. Landscape Design strategy
  - c. Landscape masterplan (Inc. visuals/perspectives)
  - d. Public open space
  - e. SUDs strategy
  - f. Boundary treatments (Inc. sections)
  - g. Hard landscaping Strategy
  - h. Tree Strategy
  - i. Planting Strategy
- 2) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics,
- 3) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved.
- 4) SUDs should be explored in greater detail as there are many opportunities to include these as part of the streetscape and landscape design due to the sites topography.

- 5) From the submitted proposals, it is not clear if the woodland area along the western edge of the site and across the middle will, if possible, be publicly accessible and included as part of open space provision. Regardless of access, this area has the potential for habitat creation, and an adequate woodland management plan should be produced.
- 6) The LVIA needs to provide further information on mitigation methods as well explore the Zones of Theoretical Visibility (ZTV) due to the undulating topography of the site.

### **The proposal**

The application plan sets out the outline application for the erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works (with some matters reserved).

The site consists of approximately 19.4 hectares and lies on the northern edge of Ipswich within a mixed use area. This includes Whitton, a residential neighbourhood and the Anglia Retail Park, which includes a number of large retail and commercial outlets. The village of Claydon lies approximately 1.5km north of the site with connection to Ipswich via Old Norwich Road, which extends south towards the town centre.

### **Review on the submitted information**

Relevant to this landscape review, the submitted application includes a Concept Masterplan, Design and Access Statement and Landscape Visual Impact Assessment.

As part of the outline application submission the concept masterplan shows the areas designated for residential development and open space including an attenuation pond, which is located within the lowest area of the site. The layout fails to suitably demonstrate how an appropriate and connected drainage system responds to the layout. As these proposals develop, a greater level of detail will be required. This could include the use of swales on road verges or buffer zones, as well as rain gardens and other balancing ponds. The plan also shows a great expanse of existing woodland, however it is not clear if it will be publicly accessible and included as part of open space provision. If it is to be included, it would be great for biodiversity trails and habitat creation. Similarly, the woodland planting forms part of the proposed boundary treatment of the site. Therefore an appropriate woodland management plan should be provided as well as an extensive boundary treatment plan.

The Landscape Visual Impact Assessment has been produced to the appropriate guidance with suitable viewpoints shown. The report suggests that 'the proposal can be integrated without significant harm to the character or visual amenities of the receiving landscape.' Therefore there is little mentioned about mitigation methods, only the pre-existing planting and landscape features on the proposed site. However, it would be advised that more information on mitigation measures is provided to enhance the suggestion of integration between the proposal and the surrounding landscape. It would also be advised that the Zones of Theoretical Visibility (ZTV) are shown and explored due to the undulating topography of the site.

Furthermore, the Design and Access statement only provides descriptive information on the landscape, and does not provide sufficient details on the proposed landscaping of the site. Therefore it would be suggested that a Landscape Strategy is provided, looking at all elements of the sites landscape and how the sites character and context is going to influence the material choices and landscape design.

### **Likely impact on the surrounding landscape**

The site is located to the west of Old Norwich Road and the east of the A14 and is already influenced by the existing settlement edge to the east and south. It also benefits from a degree of enclosure created by the existing boundary vegetation and localised landform.

The application site is located within two Landscape Character Areas (LCA). The majority of the site is located within the Plateau Estate Farmlands LCA, with key characteristics such as; flat landscape of light loams and sandy soils, large scale rectilinear field pattern, a network of tree belts and coverts, large areas of enclosed former heathland and 18th- 19th & 20th century landscape parks. Whereas the northern tip of the application site is located within the Rolling Estate Farmlands LCA. The key characteristics of this LCA include gently sloping valley sides and plateau fringes, generally deep

loamy soils, an organic pattern of fields modified by later realignment and important foci for early settlement. There is an expectation that many of these landscape principles will be designed into the emerging development proposals.

The proposed landscape treatment includes the enhancement of site boundaries and proposed internal vegetation to achieve separation between two areas of the site. Existing vegetation is to be retained as part of the proposal therefore a management and maintenance programme for this planting should be issued as a planning condition to ensure their survival during construction and beyond.

#### **Proposed mitigation**

The indicative proposal shows an area of water attenuation and green open space on the northern edge of the proposed development. As part of this feature, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting.

As stated previously, an appropriately detailed landscape and boundary plan will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal, suitable to limit any negative visual effect the proposal may have on the existing settlements.

Hopefully you find these recommendations insightful and if you have any queries please contact us.

Yours sincerely,

Ryan Mills BSc (Hons) LMLI  
Landscape Consultant  
Telephone: 03330320591  
Email: ryan.mills@essex.gov.uk

#### **Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Resource Management  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

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

Enquiries to: Rachael Abraham  
Direct Line: 01284 741232  
Email: [Rachael.abraham@suffolk.gov.uk](mailto:Rachael.abraham@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2017\_1832  
Date: 28<sup>th</sup> June 2017

For the Attention of Ben Elvin

Dear Mr Isbell

**Planning Application 1832/17 – Land west of Old Norwich Road, Whitton: Archaeology**

This site lies in an area of archaeological importance recorded on the County Historic Environment Record. It is located in a topographically favourable location for human activity of all periods, overlooking a tributary of the River Gipping. Within the site itself, cropmarks of two enclosures have been identified (WHI 015 and 016) and finds scatters of prehistoric, Roman, Saxon and medieval date have also been recorded (IPS 093 and WHI 002). Further multi-period finds scatters have been recorded within the vicinity of the site (WHI 013, WHI Misc and AKE 011) and archaeological investigations immediately to the south identified archaeological features of Iron Age date (IPS 387). Recent archaeological investigations to the north as part of the EA1 scheme have identified multi-period archaeological remains, and there is a known area of Saxon activity at Akenham to the west. As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, which has never been subject to archaeological assessment. Groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework and is consistent with the advice provided during site allocation consultations in 2014.

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

In order to establish the archaeological potential of the site, a geophysical survey will be required in the first instance. The geophysical survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:  
<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team



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

## **Suffolk Fire and Rescue Service**

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

Your Ref:  
Our Ref: ENG/AK  
Enquiries to: Mrs A Kempen  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 28 June 2017

### **Planning Ref: 1832/17 + S106**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land West of Old Norwich Road, Ipswich**  
**DESCRIPTION: 315 dwellings**  
**NO: HYDRANTS POSSIBLY REQUIRED: Required**

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

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/



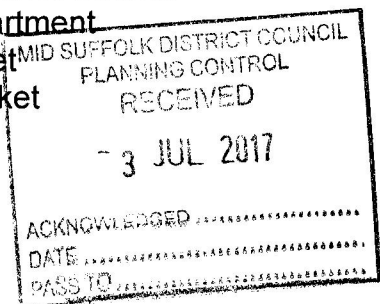
OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

Mrs A Kempen —  
Water Officer

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



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

Your Ref:  
Our Ref: FS/F030123  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 28/06/2017

Dear Sirs

**Land west of Old Norwich Road, Ipswich**  
**Planning Application No: 1832/17 + S106**

I refer to the above application.

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

**Access and Fire Fighting Facilities**

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

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

**Water Supplies**

Suffolk Fire and Rescue Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

OFFICIAL

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

Yours faithfully

Mrs A Kempen  
Water Officer

Enc: PDL1

Copy: Mr G Barton, Turley, 18 Windsor Place, Cardiff CF10 3BY  
Enc: Sprinkler information

[Planningcontributions.admin@suffolk.gov.uk](mailto:Planningcontributions.admin@suffolk.gov.uk)

**From:**RM Floods Planning

**Sent:**4 Oct 2017 14:05:56 +0100

**To:**BMSDC Planning Area Team Green

**Cc:**Ben Elvin

**Subject:**2017-10-04 JS Reply Land To The West Of Old Norwich Road And To The East Of The A14, Claydon Ref 1832/17

Dear Ben Elvin,

**Subject: Land To The West Of Old Norwich Road And To The East Of The A14, Claydon Ref 1832/17**

Suffolk County Council, Flood and Water Management have reviewed application ref 1832/17.

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

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

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
  - a. Dimensioned plans and drawings of the surface water drainage scheme;
  - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
  - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to  $Q_{bar}$  or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;

- d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. When discharging into the chalk, the infiltration basin shall be no greater than 1m depth and shall be highly vegetated to protect ground water;

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

- 3. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

- 4. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

5. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution
- The use of individual plot specific soakaways are preferable rather than a shared infiltration basins

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864

-----Original Message-----

From: planninggreen@baberghmidsuffolk.gov.uk [mailto:planninggreen@baberghmidsuffolk.gov.uk]

Sent: 26 September 2017 11:52

To: RM Floods Planning <floods.planning@suffolk.gov.uk>

Subject: Planning Re-consultation Request - 1832/17

Please find attached planning re-consultation request letter relating to planning application - 1832/17 - Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon ,

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

**From:**RM Floods Planning  
**Sent:**22 Jun 2017 14:07:36 +0100  
**To:**BMSDC Planning Area Team Green  
**Cc:**Rebecca Biggs;Giles Bloomfield  
**Subject:**RE: Planning Consultation Request - 1832/17

Dear Rebecca Biggs,

**Subject: Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon Ref 1832/17**

Suffolk County Council, Flood and Water Management have reviewed application ref 1832/17

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

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

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

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

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



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

Those highlighted have not been received and should be submitted in support of the application.

Pre-app	Outline	Full	Reserved Matters	Discharge of Conditions	Document Submitted
✓	✓	✓			Flood Risk Assessment/Statement (Checklist)
	✓	✓			Drainage Strategy/Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				<b>Ground investigation report (for infiltration)</b>
	✓	✓			<b>Evidence of 3<sup>rd</sup> party agreement to discharge to their system (in principle/consent to discharge)</b>
		✓		✓	Maintenance program and ongoing maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration test results (BRE365)
		✓	✓	✓	Detailed landscape details
		✓	✓	✓	Discharge agreements (temporary & permanent)

		✓	✓	✓	Development management & construction phasing plan
--	--	---	---	---	--

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864

-----Original Message-----

From: planninggreen@baberghmidsuffolk.gov.uk [mailto:planninggreen@baberghmidsuffolk.gov.uk]

Sent: 16 June 2017 17:48

To: RM Floods Planning <floods.planning@suffolk.gov.uk>

Subject: Planning Consultation Request - 1832/17

Please find attached planning consultation request letter relating to planning application - 1832/17 - Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon ,

Kind Regards

Planning Support Team



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

### Formal Recommendation to an Application for Planning Permission

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

To: Mid Suffolk District Council

CC: [growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 1832/17

Referring to the planning application referenced above, dated 20 June 2017, application for the erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works, Land to the West of Old Norwich Road and to the East of the A14, Claydon, notice is hereby given that Highways England's formal recommendation is that we:

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

Highways Act Section 175B ~~is~~ is not relevant to this application.<sup>1</sup>

---

<sup>1</sup> Where relevant, further information will be provided within Annex A.

**Signature:**

**Date:** 29 June 2017

**Name:** David Abbott

**Position:** Asset Manager

**Highways England:**

Woodlands, Manton Lane  
Bedford MK41 7LW

[david.abbott@highwaysengland.co.uk](mailto:david.abbott@highwaysengland.co.uk)

Your Ref: MS/1832/17  
Our Ref: 570\CON\2164\17  
Date: 6<sup>th</sup> November 2017



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

Email: [planningadmin@babberghmidsuffolk.gov.uk](mailto:planningadmin@babberghmidsuffolk.gov.uk)

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

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/1832/17**

**PROPOSAL:** Outline Application (with some matters reserved) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works

**LOCATION:** Land To The West Of Old Norwich Road, And To The East Of The A14, Claydon

**ROAD CLASS:**

Notice is hereby given that the County Council as Highway Authority does not object to the proposal subject to a S106 Agreement to its satisfaction and inclusion of the conditions shown below on any permission granted. The applicant's attention is drawn to the comments requesting the need for additional conditions or obligations once the designs for Old Norwich Road/Bury Road junction and Old Norwich Road/Whitton Church Lane junction are agreed in principle.

**Comments**

- 1 Ipswich Northern Relief Road - we feel it is important to bring to the developer's attention a study that has been commissioned part of the Suffolk County Council's commitment to short, medium and long term plans to improve transport in the wider Ipswich area. The study is to address existing congestion and to accommodate future planned growth in and around the town. This study has highlighted three potential corridors to the north of Ipswich as a potential link between the A12 and A14 in the vicinity of the proposed development site. The next stage of the study will examine route options in more detail and initial findings are programmed to be reported in early 2018.
- 2 Outline Road layout – Although this is an outline planning application, we would like to mention the following concerns:
  - It would be desirable for a pedestrians and cycle link to the west to the of the development between the northern and southern sites
  - The sketches provided indicate the road layout has sharp bends on the main access road. Although this can be an effective speed reduction option in a built up area, it is considered the layout would is not suitable for a bus route.

- If drivers miss or ignore signage that the site is effectively a dead-end road and believe they can exit through the bus gate, there are insufficient turning locations at the north of the site therefore a loop may be more appropriate in this location.

Highway Improvements - The mitigation proposals regarding highways outlined in the Transport Assessment are acceptable on the following grounds:

- **Bus Gate** – There is a ‘bus gate’ on Old Norwich Road to promote sustainable transport and protect residential amenity from high levels of vehicular traffic that may use it in preference to the A14 and Bury Road in Ipswich. Acknowledging that the scheme could compromise this strategy, while attempting to maximise accessibility to bus services, the proposal includes another bus gate. As well as physical design features, it is necessary to be able to legally enforce restrictions on the classes of vehicle that may travel through this gate. Only the County Council may make a traffic regulation order (TRO) to do this. Payment to the County Council of £10,000 is required at least 9 months prior to the opening of the Bus Gate to make the TRO in time. The Owner must covenant with the County Council not to allow any dwellings to be occupied prior to opening of the Bus Gate that are not within 200m of a bus stop. They are to notify it in writing at least 9 months in advance of the date of intended opening of the Bus Gate. Once an order has been made and implemented any unspent balance will be returned within 12 months. The contribution should be index linked. (please note – it is assumed that the old bus gate will be removed and access restricted to pedestrians and non-motorised vehicles only).
- **Old Norwich Road/Whitton Church Lane junction** – as there will be an increase in traffic traveling northbound and southbound, improvements are required at this junction as the current layout encourages vehicles to turn into Whitton Church Lane and the visibility for vehicles exiting Whitton Church Lane is poor and will require improvements. This again will be subject to a condition once a design has been agreed.
- **Junction Improvements to Bury Road/Old Norwich Road** – we have concerns regarding the proposals at this junction as shown on the illustrative drawing Figure 8.1B.
  - regarding the left turn filter, the layout may not be deliverable considering the topography of the area and other constraints. This lane is only long enough for 3 car length vehicles therefore, any more wishing to turn left would be sitting on the path of any buses or cycles.
  - The length of the diverging lane is very short and it relies on the driver having to use his mirrors to make the left turn manoeuvre in a reduced space. This would increase this risk of conflicts with buses and cyclists and could also encourage drivers to enter into the bus lane therefore committing a moving traffic offence.
  - Although the trip information states the improvements would deliver a scheme within the junction’s capacity, with all the committed developments on Old Norwich Road, this is basically a cul-de-sac and only one means of vehicular access for residents. The Suffolk Design Guide states that ‘two points of access should be provided..’. As realistically, there is only one provided. The Highway authority will need to be satisfied that emergency access is provided through the northern bus gate.

Suffolk County Council’s intension will be to either condition (S278) or request obligations (S106) in regard to the improvements at the junctions. However, the current layouts are not satisfactory or acceptable at the present time.

## Conditions

### 1 AL 2

Condition: No part of the development shall be commenced until details of the proposed access (including the position of any gates to be erected and visibility splays provided) have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place, Thereafter the access shall be retained in its approved form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

## 2 ER 1

Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

## 3 ER 2

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

## 4 HGV1

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- i) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

## 5 NOTE 01

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

For further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>.

## 6 NOTE 07

The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

## 7 P 2

Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric charging points, secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

## **S106 Contributions**

### Public Transport

This site is likely to have a large impact on services in the area. There needs to be some evidence that the existing bus operators will be willing to divert their bus services through the proposed development spine road to encourage new residents to travel by bus.

The proposed bus gate position to the north of the development is acceptable in principle although will need to be self-enforcing to allow buses and emergency vehicles access only.

The bus stop locations are acceptable and will need to include with raised kerbs, markings, RTP1 screens and space for shelters as part of the development. A contribution of £50,000 is necessary to provide these site specific infrastructure.

## Travel Plan

To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and there are certainties that the Travel Plan will be implemented in full; the following Section 106 contribution is required:

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100<sup>th</sup> dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is the longest duration. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.
- Travel Plan Implementation Bond, or cash deposit - £161,035 (£511 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan and. This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves. A rolling bond, one-off Travel Plan Contribution for SCC to deliver the Travel Plan on behalf of the applicant, or any other suitable obligations to guarantee Travel Plan implementation may also be considered.

The implementation of the Travel Plan should ideally be secured solely by Section 106 obligations. A planning condition may be insufficient due to the size and possible phasing of the development. Therefore, the following elements of the Travel Plan should be secured by Section 106 obligations:

- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved travel pack to each resident on occupation
- Submission, approval and full implementation of a Full Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

All the contributions and obligations have taken into account CIL regulation 122 and are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted.

Yours faithfully

**Sam Harvey**  
**Senior Development Management Engineer**  
**Strategic Development**



**From:**BMSDC Planning Mailbox  
**Sent:**26 Jul 2017 18:06:41 +0100  
**To:**BMSDC Planning Area Team Green  
**Subject:**FW: Application - Claydon Land west of Old Norwich Road - MS/1832/17

**From:** Sam Harvey  
**Sent:** 26 July 2017 17:57  
**To:** BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>  
**Subject:** Application - Claydon Land west of Old Norwich Road - MS/1832/17

Dear Planning

Just to keep you informed, we are talking to the developer's transport associates regarding the additional information and data required on the traffic model to enable us to make a decision on the application.

I hope to have a response to you soon.

Kindest regards

Samantha Harvey

Senior Development Management Engineer

Resource Management

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, Suffolk

IP1 2BX

**From:**Sam Harvey  
**Sent:**10 Jul 2017 14:20:07 +0100  
**To:**BMSDC Planning Mailbox  
**Subject:**Application - Claydon Land west of Old Norwich Road - MS/1832/17

Dear sirs

Thank you for the information attached to the application for the above development.

To enable SCC highways to make a decision on the application, the following information is required:

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

Kindest regards

Samantha Harvey

Senior Development Management Engineer

Resource Management

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, Suffolk

IP1 2BX

**From:**RM PROW Planning  
**Sent:**7 Aug 2017 11:00:03 +0100  
**To:**BMSDC Planning Area Team Green  
**Cc:**Sam Harvey;Gareth.Barton@turley.Co.UK;Debbie Adams  
**Subject:**RE: Planning Consultation Request - 1832/17  
**Attachments:**183217 - Land to the west of Old Norwich Rd, East of A14 - FP15 - map.pdf

My apologies for the delay with our response.

**Our Ref: E560/015/ROW405/17**

**For The Attention of: Ben Elvin**

### **Public Rights of Way Response**

Thank you for your consultation concerning the above application.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Whitton FP15 has been noted through the south of the site and the D&AS states it will be maintained on that alignment with properties facing and appears to be within a green corridor, which is an acceptable design.

It also states that FP15 appears to terminate at the west end, it should be noted that the route continues as Ipswich Public Footpath 73, connecting to the rest of the Public Rights of Way network, please refer to the attached plan.

Whilst we do not have **any objections** to this proposal, the following informative notes apply.

### **Informative Notes**

The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

**To apply to carry out work on the Public Right of Way or seek a temporary closure**, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

**To apply for structures, such as gates, on a Public Rights of Way**, visit

<http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.
3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.
5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
  - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
  - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
  - **Restricted byway** – has similar status to a bridleway, but can also be used by a ‘non-motorised vehicle’, for example a **horse and carriage**.
  - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

More information about Public Rights of Way can be found at  
[www.suffolkpublicrightsofway.org.uk](http://www.suffolkpublicrightsofway.org.uk)

Regards

**Jackie Gillis**

**Green Access Officer**

**Access Development Team**

Rights of Way and Access

Resource Management, Suffolk County Council

Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

 <http://www.suffolkpublicrightsofway.org.uk/> | [Report A Public Right of Way Problem Here](#)

**For great ideas on visiting Suffolk's countryside visit [www.discoversuffolk.org.uk](http://www.discoversuffolk.org.uk) |**



-----Original Message-----

From: [planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk) [<mailto:planninggreen@baberghmidsuffolk.gov.uk>]

Sent: 16 June 2017 17:47

To: RM PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: Planning Consultation Request - 1832/17

Please find attached planning consultation request letter relating to planning application - 1832/17 - Land To The West Of Old Norwich Road And To The East Of The A14 , Claydon, ,

Kind Regards

Planning Support Team



Your ref: 1832/17

Our ref: Claydon – land to the west of Old  
Norwich Road and to the east of the A14  
00051089

Date: 24 January 2018

Enquiries to: Neil McManus

Tel: 07973 640625

Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mr Steven Stroud,  
Growth & Sustainable Planning,  
Mid Suffolk District Council,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
Suffolk,  
IP1 2BX

Dear Steven,

**Claydon: land to the west of Norwich Road and to the east of the A14 – developer contributions**

I refer to the proposal: outline planning application for outline application (with some matters reserved) – erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works.

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

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

The District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April



2017) – with an initial consideration by the District's planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

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

And in paragraph 17 of the NPPF it states *"Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking."* One of these 12 principles say that planning should *"take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs."* The strategy of delivering a new primary school in the Claydon locality to meet local needs ensures that housing growth, including this proposed development, is sustainable in respect of the NPPF and local plan policies.

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

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

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



2. The Claydon Primary School expansion planning application received a resolution to grant planning permission by the County Council's Development and Regulation Committee at its meeting on 16 January 2018. This is subject to the prior completion of a planning obligation and the imposition of planning conditions. The aim is to complete the project for the expansion of the school up to 525 places by September 2019. This expansion project will not deal with pupils arising from this proposed development.
3. The entry in the County Council's Budget Book is for a 'contractually committed scheme' which is a project for the expansion of Claydon Primary School up to 525 places. Refer to Cabinet meeting reports for meeting to be held on 23 January 2018 under agenda item 7 – Revenue Budget 2018-19 and Capital Programme 2018-21 – Appendix C – Annex E.
4. In respect of the developer contributions sought to mitigate the harm arising from this proposed scheme the following sets out the County Council's position:
  - a) Build cost contribution (BCIS linked) of £1,297,891 (2017/18 costs) to be payable in 4 equal instalments – triggers being 25% prior to 50<sup>th</sup>, 125<sup>th</sup>, 200<sup>th</sup> and 250<sup>th</sup> dwelling occupations. To be secured by way of a planning obligation.
  - b) Land contribution of £92,983 to be payable prior to 50<sup>th</sup> dwelling occupation. To be secured by way of a planning obligation.
  - c) Use of the developer contributions – to be used towards the site acquisition and build costs of a new primary school in the Claydon locality to serve the new residents of the proposed development.
  - d) The developer contributions will be secured for a period of up to 10 years and returned if not spent.
  - e) A clause included in the planning obligation that will enable the full developer contributions to fall away and/or to be returned if the Joint Local Plan is adopted without the identified need for a new primary school in Claydon, Barham, Great Blakenham or Bramford to serve the proposed development.
  - f) A clause included in the planning obligation that will enable the full or a relative proportion of developer contributions to fall away, or be returned in full, if in the interim the existing Claydon Primary School is expanded to 630 places (three forms of entry).

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

Yours sincerely,



Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Growth, Highways & Infrastructure Directorate – Strategic Development

Your ref: 1832/17  
Our ref: Claydon – land to the west of Old  
Norwich Road and to the east of the A14  
00051089  
Date: 20 June 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mr Ben Elvin,  
Growth & Sustainable Planning,  
Mid Suffolk District Council,  
Council Offices,  
131 High Street,  
Needham Market,  
Ipswich,  
Suffolk,  
IP6 8DL

Dear Ben,

**Claydon: land to the west of Norwich Road and to the east of the A14 – developer contributions**

I refer to the outline planning application for Outline Application (with some matters reserved) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works. .

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

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

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

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

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

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,

c) Fairly and reasonably related in scale and kind to the development.

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

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

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

### **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 and will charge CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

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

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

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

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

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

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

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

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

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

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

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

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

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

1. The current Claydon Primary School is at capacity and there is a capital project being pursued to expand it to 630 places in order to deal with existing growth in the locality. Further expansion of this school beyond 630 places is not a tenable option.



2. Whichever strategy is the most appropriate a site of a minimum size of 2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
3. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 79 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school.
- £6.9m/420places = £16,429 per pupil place.
- From 315 dwellings it is forecast that 79 primary age pupils will arise.
- Therefore 79 pupils x £16,429 per place = £1,297,891 (2017/18 costs).

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £494,200 for a 2 hectare site and equates to £1,177 per pupil place. For the proposed development, this equates to a proportionate land contribution of 79 places x £1,177 per place = £92,983.

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

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

Please note that the early years pupil yield ratio of 10 children per hundred dwellings is expected to change and increase substantially in the near future. The Government announced, through the 2015 Queen's Speech, an intention to double the amount of free provision made available to 3 and 4 year olds, from 15 hours a week to 30.

3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

- 4. Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Christopher Fish.

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

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

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

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

*- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less*

*developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

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

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

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

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

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

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

- 9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early

consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.

**10. Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

**11. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

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

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

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

Yours sincerely,

Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Strategic Development – Resource Management

cc Carol Barber, Suffolk County Council  
Christopher Fish, Suffolk County Council  
Floods Planning, Suffolk County Council  
Suffolk Archaeology Service





Phil Kemp  
Design Out Crime Officer  
Bury St Edmunds Police Station  
Suffolk Constabulary  
Raynegate Street,  
Bury St Edmunds, Suffolk  
Tel: 01284 774141  
[www.suffolk.police.uk](http://www.suffolk.police.uk)

## Planning Application (1832/17)

**SITE: Land to the west of Old Norwich Road, Claydon for 315 dwellings**

**Applicant: Ashfield Land Ltd**

**Planning Officer: Mr Ben Elvin**

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines.

Suppliers of suitably accepted products can be obtained by visiting [www.securedbydesign.com](http://www.securedbydesign.com).

Dear Mr Elvin

Thank you for allowing me to provide an input for the above Outline Planning application for the proposed development of 315 dwellings, at land west of Old Norwich Road, Claydon.

I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act.

I realise as this is an outline proposal further details will be forthcoming at the reserved matters stage, **particularly with regard to parking, however, I have a number of concerns regarding this application.**

- 1.0 I have concerns that the footpaths marked on the master plan at figures five (by fig 6) and nine could become generators for crime if not properly lit and the surrounding perimeter vegetation not well maintained. (SBD New Homes 2016, page 15, Para 8.6 – 8.19 refers).
- 1.1 I also have concerns with regard safety for the users of the footpath which will be retained leading from Old Norwich Road by the current residential properties Briar Bank and Yew Tree, owing to the fact this area is quite dark and enclosed due to the level of vegetation already in place at the side of these two properties.
- 1.2 I would like more details on how the perimeter boundary by the existing properties on the eastern side of the development will be secured.
- 1.3 The master plan proposes that the bus route could go through the main primary road for the development and subject to approval will be barriered, I would like to know more about how this will be achieved and the details of the equipment to be installed, which I recommend have been successfully tested to PAS68-2:2013. Another alternative could be rising bollards again tested to the same standard.
- 1.4 The master plan outlines that the primary road is intended to be a pedestrian and cyclist area, with vehicle parking at the rear and even quotes rear courtyard parking. Police

nationally do not recommend rear parking as it tends to provide very little, if any surveillance. Communal parking should be in small groups, close and adjacent to the front or side of homes and must be within view of active rooms that will provide natural surveillance. (SBD New Homes 2016, page 62, Para 52.1 refers).

- 1.5 I note that there are a number of under-crofts also marked on the plans, under-crofts too are discouraged by police as they do not provide an active frontage, concealing offenders and attracting anti-social behaviour.
- 1.6 I take on board that the parking areas have not been fully designed into the outline plans, but I would urge the developers to promote the use of garages rather than car ports and keep such buildings to the side of properties rather than set back, which would negate surveillance of such areas and make them vulnerable to offenders walking over to them and climbing over rear walls or fences. (SBD New Homes 2016, page 122-23, Para 16.1 – 16.7 refers).
- 1.7 Should a number of car ports be implemented, I strongly recommend that dusk to dawn security lighting is installed to the side of such properties that conforms to BS5489:2013 and that at the entrance to these under-crofts security gates are fitted that meet BS EN 13241-1 safety standards.
- 1.8 I note a number of the communal areas and play areas will be near to the Old Norwich Road. I trust these areas will be designed to allow supervision from nearby dwellings with a safe route for users to come and go. I would like to see one metre metal hooped railings around all communal areas.
- 1.9 The open spaces must be designed with due regard for natural surveillance, with adequate resources in place to ensure its satisfactory future management. (SBD New Homes 2016, page 17, Para 9.1 – 9.4 refers).
- 1.10 Young persons' play areas should ideally be designed to so that they can be secured at night to reduce the threat of damage and graffiti.
- 1.11 I trust the frontage of all buildings will have no recesses, which could allow an offender to hide or become areas where litter could congregate and become a potential arson problem.
- 1.12 To the planners' credit, I applaud that the main design facilitates the back to back design of the properties, with I trust no perceived rear alleyways.

I would further strongly advise the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

I would like to see the development, or at least the affordable housing built to Secured by Design SBD New Homes 2016 accreditation. Further information on SBD can be found at [www.securedbydesign.com](http://www.securedbydesign.com)

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

## **2.0 GENERAL OBSERVATIONS**

It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling for residents and passers-by.

- 2.1 Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.
- 2.2 For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.
- 2.3 Properties with gable end windows that look onto public spaces is a police preferred preference of design that allows natural surveillance of the area to reduce the risk of graffiti, other forms of criminal damage, or inappropriate loitering. Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.
- 2.4 I would refer the developers to SBD 2016, page 18 on “Dwelling Boundaries”, which outlines the importance of how the boundary between public and private areas should be clearly indicated.

**The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community.**

**Further information on the security of footpaths can be found within “SBD New Homes 2016”, (pages 14-17 at Paras 8.1-8.19 refer).**

### **3.0 SECURE BY DESIGN (SBD)**

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a ‘fortress environment’.

### **4.0 REFERRALS**

- 4.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.

**4.12** The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.

#### **4.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)**

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

#### **4.3 Department for Transport – Manual for Streets (Crime Prevention)**

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

*Safer Places* highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN) 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.
- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

## **5.0 GENERAL COMMENTS ON PROPOSED PLAN**

My specific observations for this development are as follows: (Further details of the following recommendations can be found in the above SDB document “Homes16”).

- 5.1 Should any play equipment be installed it should meet BS EN 1176 standards and be disabled friendly. I Would recommend that any such area has suitable floor matting tested to BS EN1177 standards.**
- 5.2 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.**
- 5.3 All litter bins should be of a fire retardant material.**
- 5.4 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading “Communal Areas” refers.**
- 5.5 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.**
- 5.6 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer’s recommendations. (SBD NH 2016 Para. 21.17).**

## **6.0 CONCLUSION**

- 6.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.**
- 6.2 As of the 1<sup>st</sup> June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards [http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured\\_by\\_Design\\_Homes\\_2016\\_V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf)**
- 6.3 SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>**
- 6.4 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police police approved minimum security standard and also achieves ADQ, involves the following:**
  - a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.**
  - b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).**

- c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, **or** STS204 issue 3:2012, **or** LPS1175 issue 7:2010 Security Rating 1, **or** LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

## **7.0 FINAL CONCLUSION**

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

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely

Phil Kemp

Designing Out Crime Officer Western and Southern Areas  
Suffolk Constabulary, Raynegate Street  
Bury St Edmunds,  
Suffolk, IP33 2AP

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

10/07/2017

Dear Ben,

**RE: 1832/17 Outline application (with some matters reserved) - Erection of up to 315 dwellings, vehicular access to Old Norwich Road, public open space, and associated landscaping, engineering and infrastructure works. Land to the west of Old Norwich Road and to the east of the A14, Claydon**

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

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

Protected and/or UK Priority Species and Habitats

A number of protected and/or UK Priority species have been recorded on the site, these include slow worm (a protected and UK Priority species), foraging bats (protected species) and skylark (UK Priority species), foraging barn owl (a Suffolk character species) was also recorded. The site also contains habitats which are potentially suitable for hedgehogs and stag beetles (both UK Priority species). Hedgerows, a UK Priority Habitat, are also present onsite.

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

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

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

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

### Ecological Enhancements

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

### Habitats Regulations Assessment (HRA)

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

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

Yours sincerely

James Meyer  
Senior Conservation Planner