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DEVELOPMENT CONTROL COMMITTEE B	
DATE:	WEDNESDAY, 23 MARCH 2022 9.30 AM
VENUE:	FRINK ROOM (ELISABETH) - ENDEAVOUR HOUSE

For consideration at the meeting on Wednesday, 23 MARCH 2022, the following additional or updated papers that were unavailable when the Agenda was printed.

T A B L E D P A P E R S

		<u>Page(s)</u>
a	DC/21/06315 THE SIX BELLS INN, HIGH STREET, GISLINGHAM, SUFFOLK, IP23 8JD	3 - 4
b	DC/21/05669 LAND TO THE SOUTH OF, FITZGERALD ROAD, BRAMFORD, SUFFOLK	5 - 14

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Agenda Item 7a

MEMBER REFERRAL TO COMMITTEE

(Completed form to be sent to Case Officer and Corporate Manager – Growth & Sustainable Planning)

Planning application reference	DC/21/06315 Full Planning Application - Change of use of the Six Bells Inn Public House to Veterinary Practice and pet supplies (sui generis). Business proposed to exist on the ground floor level whilst retaining the existing first floor ancillary residential accommodation. The Six Bells Inn High Street Gislingham Suffolk IP23 8JD
Parish	Gislingham
Member making request	Rowland Warboys
Please describe the significant policy, consistency or material considerations which make a decision on the application of more than local significance	<p>Controversial – loss of a community asset.</p> <p>LP12 - Safeguarding Economic Opportunities</p> <p>LP29 – Services and Facilities within the Community</p> <p>(A shortage of suitable premises for potential business use would not be assuaged by replacing one established business with a long history and viable future with another.)</p> <p>The nearest Veterinary Surgery to Gislingham is in Eye – 5.3 miles.</p>
Please detail the clear and substantial planning reasons for requesting a referral	<p>There is considerable local opposition to the proposed change of use, this is the only public house in Gislingham and is considered an essential community asset.</p> <p>I would like time to enable Gislingham Parish council to nominate the Six Bells as an asset of community value.</p>
Please detail the wider District and public interest in the application	<p>Gislingham is considered a hinterland village with a primary school and Londis Village Store.</p> <p>CAMRA Description: "Large, high ceilinged Victorian pub, recently renovated. A single bar with several areas and a 10m deep well in the floor. Run as a proper village pub catering for drinkers. No food but does serve rolls and sandwiches. Hoping to have tea room up and running soon. No children or dogs in the bar. Occasional guest beer." Oct 2021</p> <p>Disabled access, parking and beer garden.</p> <p>William Stagg 1st recorded landlord 1844</p>

<p>If the application is not in your Ward please describe the very significant impacts upon your Ward which might arise from the development</p>	
<p>Please confirm what steps you have taken to discuss a referral to committee with the case officer</p>	<p>I have discussed this with the Case Officer and I am putting this in as a provisional referral subject to a meeting of the Gislingham Parish Council on 10th Jan. 2022</p>



Phil Kemp Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
www.suffolk.police.uk

Planning Application (DC/21/05669).

Site: Planning Application of up to 115 dwellings at Land to the south of Fitzgerald Road, Bramford, IP8 4AB

Applicant/Agent: Mr Chris Smith for Wintour & Hopkins Homes Ltd. Melton, Woodbridge.

Planning Officer: Ms Elizabeth FLOOD

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 e, 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.)**

Dear Ms FLOOD

Thank you for allowing me to provide an input for the above Planning Application.

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

It is good to see that the majority of properties will be back-to-back. I have concerns regarding the parking, in particular where the spacings are set too far back and where there are there five flying freeholds (undercofts) incorporated. Flying freeholds are proven generators of crime, as they allow an offender access with no surveillance.

In its current form with these flying freeholds incorporated the police cannot fully support this development, unless changes are made to reduce the perceived crime levels that is believed these current proposals would generate. Alternative methods should be looked at in order to allow prospective local residents to feel safe and reduce the fear of crime.

I also have concerns regarding the alleys incorporated.

The development is on what is currently open land, with open land on two main sides. However, the area around it is well populated and a busy location. Further details on crime within the area can be found at Para 4.0.

The initial concerns from looking at the basic designs are;

- a) There are five flying freeholds incorporated at plots 1-2: plots 11-12; plots 13-14; plots 78-79 and plots 110-111. Flying freeholds are proven generators of crime, with no surveillance and they allow offenders easy access.**
- b) It looks like a number of on plot parking spaces appear to be set back too far that include plots 5, 6, 8, 9-10, plots 34-35, 37, plots 40-45, 47, plots 72-77, 86-89, 91-93 and 114. The police do not recommend on plot parking spaces being too far back, as they open the side of properties to allow offenders to enter these areas and up to the rear gates of properties usually unobserved. (SBD Homes 2019, pages 22-23, paras 16.1-16.2 and 16.6 refer).**
- c) There are two rear parking courtyards, along with a number of single plots that have rear parking incorporated. Plots 22-25 have rear parking and whilst there are floor plans listed the actual plans state they are for plots 177-180. The plans show active rear kitchen windows, but are these plans for plots 22-25? Whether or not the rear windows will be active the two visitors parking spaces and rear parking for plot 25, along with rear parking for plots 29-30 are also a real concern. In their current form plots 29-30 have no surveillance for their vehicles and the design opens up the rear of plots 2-3 and plots 28-29 to be more vulnerable to unlawful incursion. Plot 39 has rear parking. There is a rear parking court for plots 59-60 and 65-66. Rear parking is discouraged by police as these areas tend to have no surveillance and can place the fear of crime upon a vehicle**

owner during the winter months when these areas tend to be in darkness (SBD Homes 2019 (V2), page 22, para 16.3 refers).

- d) There are a number of parking spaces that are sighted too far to the side of their respective plots, which include plots 26, 32, 36, 58, 69, 82, 84.
- e) It is a documented fact that where parking spaces are either too far from respective properties or in short supply, such problems usually lead to antisocial behaviour, either from residents frustrated at not being able to park within their own living space, or from visitors, particularly any who may have parked there in the past and now find it difficult to do so. The resulting problems that such shortages produce include antisocial behaviour, either verbal or physical, along with criminal damage, graffiti and assault. There is a thesis by prominent college professor, Rachel Armitage, from the University of Huddersfield on parking and antisocial behaviour, for further details use the following link:[https://live-cpop.ws.asu.edu/sites/default/files/problems/parking_garage_theft/PDFs/Car%20Parking Crime and Anti Soci al.pdf](https://live-cpop.ws.asu.edu/sites/default/files/problems/parking_garage_theft/PDFs/Car%20Parking%20Crime%20and%20Anti%20Social.pdf) One of the main findings of this report stated “Developments must have allocated car parking spaces for visitors and the design allocation of on street and communal parking must take care to avoid neighbour disputes”.
- f) There are six alleys incorporated, which are a concern:
- I. By plot 21 to access plot 20, backing onto the enclosed rear parking for visitors and plot 25, also opening up the rear of plots 6-7 to be more susceptible to unlawful incursion.
 - II. By plots 75-76, to access the rear of plots 62-63, making all the rear of these properties and plots 48-49 more vulnerable to unlawful incursion.
 - III. By the rear of plots 84-86, to access the rear of plots 82-83, making these and the rear of plot 87 more vulnerable to unlawful incursion.
 - IV. By the rear of plots 92-94 to access the rear of plot 95, making these and the rear of plots 97 and plots 100-101 more vulnerable to unlawful incursion.
 - V. By the side of plot 102 to access the rear of plot 103, making these and the rear of plot 91 more vulnerable to unlawful incursion.
 - VI. Finally by the rear of plots 110-111 to access plots 108-109, making these and the rear of plots 106 and 112 more vulnerable to unlawful incursion.
- g) It is good to note from the boundary plan that a number of vulnerable areas that could be used for unauthorised off-road parking will be prevented by post and rail. There is no post and rail indicated for around the Suds Basin area on the central southern side. It would be preferred if this area was also bordered off with something similar to post and rail (SBD Homes 2019 (V2) pages 18-21, at Paras 10-1-10.94 refer).
- h) The northern rear sides of plots 91 and plots 102-104 do not show how these border lines will be perimetered off. I take it they too will have 1,8m close boarded fencing, as they will border land towards the local church and there is a pathway along the eastern side (SBD Homes 2019, page 15 at Para 8.9 refers). Research has shown that 85% of unlawful entries occur via the rear of a property (SBD Homes 2019 (V2) page 15, Para 8.9 and pages 21-22, at Paras 13.1-13.2 refer).
- i) There is no lighting plan, so it is not known how the area will be lit? There are three main pedestrian walkways leading up from the southern area. Footpaths must have clear lines of sight and adequate luminescence at critical points, especially where paths connect in order to make users feel safe to use them and if there is to be any vegetation either side of these pathways, it needs to be low lying and regularly maintained to prevent offenders hiding behind them. All footpaths should be at least 3m wide to allow people to pass one another without infringing personal space and to accommodate passing wheelchairs, cycles and mobility scooters (SBD Homes 2019 (V2), pages 14-17 refer).
- j) Where footpaths join existing roads, or other pathways, they need to be well lit in accordance with BS5489:2020 to provide reassurance that people will feel safe and not fearful of using such areas. (<https://www.securedbydesign.com/guidance/research-case-studies-guidance/lighting-against-crime/viewdocument/36> refers). (SBD Homes 2019 (V2), pages 16-17, paras 8.19-8.21 and pages 25-26, Paras 18.1-18.6 refer).

k) There needs to be good security around the pumping station.

The role of a Design Out Crime Officer (DOCO) within Suffolk Police is to ensure that new developments are designed to minimise the opportunity for crime to occur which in the main is through the analysis method of Crime Prevention Through Environmental Design (CPTED) which is an analysis that is adopted for every proposed planning application no matter what the scheme. Further information on CPTED can be found at [Crime prevention through environmental design - Wikipedia](#) or [Crime Prevention Through Environmental Design – Design For Security](#) Which is backed up by further security principles through the national Police Secure By Design (SBD) methodology. Further information on Secure By Design can be found at [Secured By Design](#)

Suffolk Police also provide an interpretation of the basic Principles of Secured by Design outlined in their “Residential Design Guide” at [Design Guide New Format \(suffolk.police.uk\)](#)

1.0 GENERAL INFORMATION

1.1 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.

1.2 Any cycle storage areas should be designed in line with Secure By Design guidelines and have the use of ground anchors or a shed shackle (SBD Homes 2019 (V2), pages 68-69, Paras 56.1-57.3 refer).

1.3 The design should look at techniques and principles to assist with the orientation and navigation of the site, creating identifiable spaces to discourage and minimise the risk of crime and Anti-Social Behaviour through natural and informal surveillance.

1.4 In particular the detailed design should take account of the following principles:

- **Access and movement:** *Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security.*
- **Structure:** *Places should be structured so that different uses do not cause conflict with no recesses, or obstacles for an offender to hide.*
- **Surveillance:** *In places where all publicly accessible spaces are overlooked CCTV should be co-ordinated within the lighting and landscape design. Lighting design should be co-ordinated with a CCTV installation and the landscape design to avoid any conflicts and to ensure that the lighting is sufficient to support a CCTV system.*
- **Lighting:** *Lighting should be designed to conform to BS 5489-1:2020 and light fittings should be protected where vulnerable to vandalism. The colour rendering qualities of all lamps should be to SBD standard of a minimum of at least 60Ra on the colour rendering index.*
- **Ownership:** *Places that promote a sense of ownership, respect, territorial responsibility and community.*

Physical protection: *Places that include necessary, well-designed security features.*

- **Activity:** *Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.*
- **Management and maintenance:** *Places that are designed with management and maintenance in mind, to discourage crime in the present and the future, encouraging businesses and legitimate business users to feel a sense of ownership and responsibility for their surroundings can make an important contribution to community safety and crime prevention. Clarity in defining the use of space can help to achieve a feeling of wellbeing and limit opportunities for crime.*

2.0 SECURE BY DESIGN (SBD)

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

The role of a Design Out Crime Officer 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’.

It would be good to see the development, or at least the Social Housing element built to Secured by Design SBD Homes 2019 accreditation.

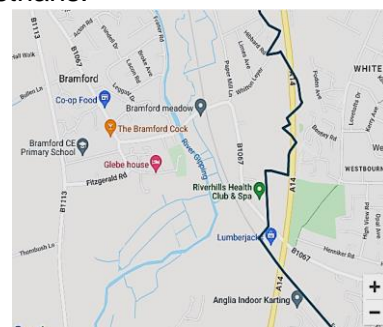
A further downloadable document can be obtained using the following link:
https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_NEW_version_2.pdf

3.0 REFERRALS

- 3.1 Section 17 of the Crime and Dis-Order Act outlines** the responsibilities placed on local authorities to prevent crime and dis-order.
- 3.2 The National Planning Policy Frame work on planning policies and decisions to create safe and accessible environments,** laid out in chapter 8, para 91b and chapter 12, para 127f, in that **developments should create places that are safe,** inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; **and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.**
- 3.3 The Suffolk Design Guide for Residential Areas- Shape of Development – (Design Principles Security)** Looking at the careful design of a new development in regard to landscaping, planting and footpaths.
- 3.4 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.

4.0 CRIME STATISTICS FOR POST CODE AREA IP8 4AY

- 4.1 The crime figures for this area have been obtained from the Suffolk Police Crime Computer base and the National Police Crime Mapper web. The Police Crime Mapper Web site is available for any member of the public using the following link:** [Hadleigh | Police.uk \(www.police.uk\)](http://Hadleigh | Police.uk (www.police.uk)) or Suffolk Observatory for Bramford at the following link:
[Suffolk - Overview - Ward | Bramford | InstantAtlas Reports \(suffolkobservatory.info\)](http://Suffolk - Overview - Ward | Bramford | InstantAtlas Reports (suffolkobservatory.info))



- 4.2 The graph right indicates a breakdown of the offences committed around this area between August 2021 to January 2022, totalling 46 offences, the majority relating to Violent and Sexual offences which totalled 31 offences. Followed by Antisocial Behaviour totalling 6 offences.**

Offence	Aug 2021	Sept 2021	Oct 2021	Nov 2021	Dec 2021	Jan 22
Burglary/Theft		1	1	2		nil
Robbery						nil
Vehicle Crime						nil
Criminal Damage/Arson						nil
ASB/Public Order/Harrasmt		1	3	2		nil
Violent & Sexual Offences	5	5	3	10	8	nil
Shoplifting						nil
Drugs					2	nil
Other Offences		1		1	1	nil
Grand Totals	5	8	7	15	11	nil

5.0 FINAL CONCLUSION

To reiterate, concerns around this development are:

- There are five flying freeholds incorporated at plots 1-2; 11-12; 13-14; 78-79 and plots 110-111. Flying freeholds are proven generators of crime.
- There are twenty-nine plots that have parking set too far back to allow offenders access into their areas.
- There are two rear parking courtyards, along with a number of single plots that have rear parking incorporated. Plots 22-25 have rear parking and whilst there are floor plans listed the actual plans state they are for plots 177-180. There are two visitors parking spaces by rear parking for plot 25. Along with rear parking for plots 29-30; 39 59-60 and 65-66. Rear parking is discouraged by police as these areas tend to have no surveillance.
- There are a number of parking spaces that are sighted too far to the side of their respective plots, which include plots 26, 32, 36, 58, 69, 82, 84.
- There are six alleys incorporated by plot 21 to access plot 20 and this alley backs onto enclosed rear parking for visitors and plot 25. An alley the rear of plots 75-76, to access the rear of plots 62-63. By the rear of plots 84-86, to access the rear of plots 82-83. By the rear of plots 92-94 to access the rear of plot 95. By the side of plot 102 to access the rear of plot 103. Along with by the rear of plots 110-111 to access plots 108-109. The inclusion of these alleys makes all the rear of all these properties and the properties around the more vulnerable to unlawful incursion.
- It would be preferred if the Suds Basin area on the central southern side is also be fenced off with something like post and rail?

- g) The northern rear sides of plots 91 and plots 102-104 do not show how these boundary lines will be perimetered off, I take it they too will have 1.8m close boarded fencing, as they will border land towards the local church and there is a pathway along the eastern side.**
- h) There is no lighting plan, so it is not known how the area will be lit? There are three main pedestrian walkways leading up from the southern area. Footpaths must have clear lines of sight and adequate luminescence at critical points, especially where paths connect in order to make users feel safe to use them and if there is to be any vegetation either side of these pathways, it needs to be low lying and regularly maintained to prevent offenders hiding behind them. All footpaths should be at least 3m wide to allow people to pass one another without infringing personal space and to accommodate passing wheelchairs, cycles and mobility scooters.**
- i) Where footpaths join existing roads, or other pathways, they need to be well lit in accordance with BS5489:2020 to provide reassurance that people will feel safe and not fearful of using such areas.**
- j) There needs to be good security around the pumping station.**

I would be pleased to work with the agent and/or the developer to ensure the proposed development incorporates preferred crime reduction elements. This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of crime.

If you 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, Raingate Street,
Bury St Edmunds, Suffolk, IP33 2AP.



21st March 2022

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

By email only

Thank you for requesting advice on this re-application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/21/05669
Location: Land To The South Of Fitzgerald Road Bramford Suffolk
Proposal: Application for approval of the outstanding Reserved Matters following grant of Outline Permission DC/19/01401- Residential development of up to 115 dwellings and access, including open space and landscaping - Details for Appearance, Landscaping, Layout and Scale required under Conditions 1 and 2 and concurrently required details of Surface Water Drainage (Condition 12); Landscape and Ecological Management Plan (Condition 15); Biodiversity Enhancement Strategy (Condition 16); Landscaping (Condition 18) and Housing Mix (Condition 22).

Dear Elizabeth,

Thank you for re-consulting Place Services on the above Reserved Matters and Discharge of Condition application. It is highlighted that our comments on the conditions specifically relate to Condition 15 (Landscape and Ecological Management Plan) and Condition 16 (Biodiversity Enhancement Strategy)

Relevant Conditions

15. CONCURRENT WITH RESERVED MATTERS: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN
Concurrent with the first submission of reserved matters a Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority. The content of the LEMP shall include the following: a) Description and evaluation of features to be managed. b) Ecological trends and constraints on site that might influence management. c) Aims and objectives of management. d) Appropriate management options for achieving aims and objectives. e) Prescriptions for management actions. f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period). g) Details of the body or organisation responsible for implementation of the plan. h) Ongoing monitoring and remedial measures. The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that



conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

16. CONCURRENT WITH RESERVED MATTERS: BIODIVERSITY ENHANCEMENT STRATEGY

Concurrent with the first submission of reserved matters a Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to the local planning authority which shall following the recommendations of the Phase 2 Ecological Surveys and Assessment (Southern Ecological Solutions, February 2019) concurrent with the application for the first reserved matters. The content of the Biodiversity Enhancement Strategy shall include the following: a) Purpose and conservation objectives for the proposed enhancement measures; b) detailed designs to achieve stated objectives; c) locations of proposed enhancement measures by appropriate maps and plans; d) persons responsible for implementing the enhancement measures; e) details of initial aftercare and long-term maintenance (where relevant). The works of enhancement shall thereafter be implemented in accordance with the approved details and the enhancements shall be retained in in accordance with that strategy thereafter.

Reason: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

Summary

We have re-assessed the Preliminary Ecological Appraisal, Phase 2 Ecological Surveys and Assessment & Shadow Habitats Regulations Assessment Report (Southern Ecological Solutions Ltd, February 2019), provided by the applicant at outline stage, relating to the likely impacts of development on designated sites, Protected & Priority Species/Habitats.

Furthermore, we have reviewed the submitted documents for this application, including the Soft Landscape Proposals – Rev F (IDP Landscape Ltd, April 2021). In addition, we have reviewed the Landscape & Ecological Management Plan (IDP Landscape Ltd, December 2021) submitted to meet the requirements of condition 15, as well as the Biodiversity Enhancement Strategy (IDP Landscape Ltd, October 2021) submitted to meet the requirements of condition 16.

It is indicated that we still support the conclusions and recommendations contained within the Phase 2 Ecological Surveys and Assessment (Southern Ecological Solutions Ltd, February 2019), as the site consists of agricultural land and the potential impacts to protected and priority species can still be predicted with sufficient certainty.

In addition, we are pleased that measures to avoid an adverse impact from the development (either alone or in combination with other plans and projects) to the Stour and Orwell Estuaries SPA and Ramsar Site will be implemented for this development. This has been outlined via the provision of a Habitat Regulation Assessment (HRA) provided by Mid Suffolk District Council. This will include the



provision of a financial contribution in line with the Suffolk Coasts RAMS, which will be secured via Part 4 of the S.106 agreement, as well as the provision of onsite measures within the development. However, we note that the Landscape Proposals – Rev F (IDP Landscape Ltd, April 2021) does not indicate that the provision of signage and dog waste bins. As a result, we recommend that an updated plan is submitted or that a prior to occupation condition is implemented to secure the finalised details, locations and maintenance of these features.

We also support the proposed soft landscaping for this development, as well as the planting schedule and specification that have been incorporated for this scheme. We are particularly pleased to see the provision of a wet attenuation basin, with an appropriate marginal planting mix for this feature. However, we do encourage the provision of shallow undulating sides on at least one side of the basin (e.g. max 1:3 slope), as well as uneven surfaces and convoluted edges to allow varied aquatic plant growth. This is recommended within the attenuation basin because this will provide the greatest habitat value, by providing optimal shelter, food and foraging and breeding opportunities for a variety of wildlife species, whilst also increasing the aesthetic of the SuDs feature. Furthermore, we also support the aftercare of the soft landscaping plan, as outlined within the Landscape & Ecological Management Plan (IDP Landscape Ltd, December 2021).

In addition, we support the submitted reasonable biodiversity enhancements, as contained within the Biodiversity Enhancement Strategy (IDP Landscape Ltd, October 2021). This includes appropriate locations, heights and orientations for bird, bat and insect boxes / integrated bricks, log piles, and hedgehog highways, as well as suitable installation and aftercare measures for these features.

However, we do encourage the developer to have the finalised soft landscaping plans to be supported by a Biodiversity Gain Assessment. The Biodiversity Gain Assessment should contain the use of the DEFRA Biodiversity Metric 3.0 (or any successor) and should preferably follow the Biodiversity Net Gain Report & Audit Templates (CIEEM, 2021)¹. This is necessary to clearly demonstrate measurable net gains for biodiversity in line with paragraph 174d & 180d of the NPPF 2021.

Furthermore, it is highlighted that a wildlife friendly lighting scheme must also still be provided prior to occupation for this application (as required under condition 17 of the outline consent). This should follow ILP Guidance² and a professional ecologist should be consulted to advise the lighting strategy for this scheme. In addition, the following measures should be indicated to avoid impacts to foraging and commuting bats:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Environmentally Sensitive Zones should be established within the development, where lighting could potentially impact important foraging and commuting routes for bats.
- An isolux plan should be provided to demonstrate that lighting is directed away from Environmentally Sensitive Zones. This should preferably demonstrate that the boundary features and Environmentally Sensitive Zones are not exposed to lighting levels of approximately 1 lux. This is necessary to ensure that light sensitive bat species, will not be affected by the development.

¹ <https://cieem.net/wp-content/uploads/2021/07/CIEEM-BNG-Report-and-Audit-templates2.pdf>

² ILP, 2018. Bat Conservation Trust Guidance Note 08/18: Bats and artificial lighting in the UK

- Warm White lights (<3000k) should be used near to Environmentally Sensitive Zones. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- Light columns should be as short as possible as light at a low level reduces the ecological impact.
- The use of cowls, hoods, reflector skirts or shields should be considered to prevent horizontal spill.

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

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Recommend Condition

1. PRIOR TO OCCUPATION: DELIVERY OF ONSITE MEASURES IN LINE WITH THE APPROVED HABITATS REGULATIONS ASSESSMENT

“On site measures to avoid impacts from the development alone to the Stour and Orwell Estuaries SPA and Ramsar site shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.

The content of the of the onsite measures will be in line with the approved Habitats Regulations Assessment and shall include the following:

- a) Purpose and conservation objectives for the proposed measures;*
- b) Detailed designs of the interpretation board, leaflets and dog waste bins;*
- c) Locations of proposed interpretation boards by appropriate maps and plans; and*
- d) details of initial aftercare and long-term maintenance of these features (where relevant).*

The measures shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.”

Reason: To avoid Adverse Effects to Site Integrity from the development alone to the Stour and Orwell Estuaries SPA and Ramsar site and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended).

Recommended action for Conditions 16 and 17

Subject to the full implementation of the Landscape & Ecological Management Plan (IDP Landscape Ltd, December 2021) and the Biodiversity Enhancement Strategy (IDP Landscape Ltd, October 2021), we recommend that condition 16 and 17 should be discharged in full at an ecological perspective.



Please contact us with any queries.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)

Ecological Consultant

placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

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