

Consultee Comments for Planning Application DC/18/05104

Application Summary

Application Number: DC/18/05104

Address: Former Mid Suffolk District Council Offices & Associated Land 131 High Street Needham Market IP6 8DL

Proposal: Planning Application. Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure. See accompanying schedule for full description of development.

Case Officer: Mark Russell

Consultee Details

Name: Mr Kevin Hunter

Address: Needham Market Community Centre, School Street, Needham Market Ipswich, Suffolk IP6 8BB

Email: clerk@needhammarkettc.f9.co.uk

On Behalf Of: Needham Market Town Council

Comments

Needham Market Town Council objects to the planning application on the grounds it fails to meet the applicant's own Housing Policy H4 PROPORTION OF AFFORDABLE HOUSING IN NEW HOUSING DEVELOPMENT

From: Planning Central <Planning.Central@sportengland.org>
Sent: 03 December 2018 14:12
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/18/05104

Thank you for consulting Sport England on the above application.

The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306), therefore Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application.

General guidance and advice can however be found on our website:

www.sportengland.org/planningapplications

If the proposal involves the loss of any sports facility then full consideration should be given to whether the proposal meets Par. 97 of National Planning Policy Framework (NPPF), link below, is in accordance with local policies to protect social infrastructure and any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes:

<http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If the proposal involves the provision of additional housing (then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

Yours sincerely,

Planning Administration Team

Planning.North@sportengland.org



Historic England

EAST OF ENGLAND OFFICE

Ms Sian Bunbury
Mid Suffolk District Council
Endeavour House
8 Russell Road
IPSWICH
Suffolk
IP1 2BX

Direct Dial: 01223 582738

Our ref: **W:** P01001770

19 December 2018

Dear Ms Bunbury

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**FORMER MID SUFFOLK DISTRICT COUNCIL OFFICES & ASSOCIATED LAND,
131 HIGH STREET, NEEDHAM MARKET, SUFFOLK IP6 8DL
Application No. DC/18/05104**

Thank you for your letter of 29 November 2018 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely



Clare Campbell

Principal Inspector of Historic Buildings and Areas
E-mail: clare.campbell@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Your ref: DC/18/05104
Our ref: Needham Market – former Mid Suffolk
District Council offices & associated land, 131
High Street 00052587
Date: 04 December 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Mark,

Needham Market: former Mid Suffolk District Council offices & associated land, 131 High Street – developer contributions

I refer to the proposal: redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure. See accompanying schedule for full description of development.

Ideally, the County Council would like to see a plan-led approach to housing growth in the 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 highway impacts and school provision.

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.

This letter sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site specific mitigation.

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.

The National Planning Policy Framework (NPPF) paragraph 56 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.

The emerging Joint Local Plan contains policy proposals that will form an important tool for the day to day determination of planning application in both districts. Infrastructure is one of the key planning issues and the Infrastructure chapter (page 65, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017) states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

The Joint Local Plan proposals include:

- a) All new development should be supported by, and have good access to, all necessary infrastructure. Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development (Page 67, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017).
- b) A draft policy is similarly drafted to address education provision as follows: Development must be supported by provision of infrastructure, services and facilities that are identified to serve the needs arising from new development (Page 67, Babergh & Mid Suffolk Joint Local Plan: Consultation Draft – August 2017).

Under Strategic policies in paragraph 20 of the NPPF it says “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (in line with the presumption in favour of sustainable development) for:

c) community facilities (such as health, education and cultural infrastructure).”

Under Decision-making in paragraph 38 of the NPPF it says “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

In determining applications paragraph 48 of the NPPF says “Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and charges CIL on planning permissions granted after 11 April 2016. Regulation 123 requires Mid Suffolk 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

The details of the impact on local infrastructure serving the development is set out below and will form the basis of a future CIL bid for funding:

- 1. Education.** The revised NPPF says in paragraph 94, ‘It is important 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. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

Furthermore, the NPPF at paragraph 104 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;'

SCC anticipates the following **minimum** pupil yields from a development of 94 dwellings, namely:

- a) Primary school age range, 5-11: 20 pupils. Cost per place is £12,181 (2018/19 costs).
- b) Secondary school age range, 11-16: 13 pupils. Cost per place is £18,355 (2018/19 costs).
- c) Secondary school age range, 16+: 3 pupils. Costs per place is £19,907 (2018/19 costs).

The local catchment schools are Bosmere County Primary School and Stowmarket High School.

The strategy at primary school level is to expand the existing school up to 420-places. At the secondary school level, construction work started on site during the October half term 2018, with phase one due to complete around Easter 2020; the second phase is the demolition of the existing building which should be completed by the summer holidays 2020.

Based on existing forecasts, SCC will have no surplus places available at the catchment schools. On this basis, at the primary school level a future CIL funding bid of at least £243,620 (2018/19 costs) will be made and at the secondary school level a future CIL funding bid of at least £298,336 (2018/19 costs) will be made.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011

places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

From these development proposals SCC would anticipate up to 12 pre-school children arising, at a cost per place of £8,333.

This proposed development is in the Needham Market ward, where there is an existing deficit of places. On this basis, a future CIL funding bid of £99,996 (2018/19 costs) will be made.

3. Play space provision. This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.

4. Transport issues. Refer to the NPPF 'Section 9 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. Suffolk County Council FAO Sam Harvey will coordinate this.

A planning obligation or planning conditions will cover site specific matters.

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. Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

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. £20,304, 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 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

- 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.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 LPAs housing team to identify local housing needs.

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and

d) where possible, provide multifunctional benefits.’

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. 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. This should be considered as part of the requirements of the NPPF Section 10 ‘Supporting high quality communication’. 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.

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.

Yours sincerely,

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

cc Carol Barber, Suffolk County Council
Sam Harvey, Suffolk County Council
Floods Planning, Suffolk County Council



Mark Russell
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2018/123584/02-L01
Your ref: DC/18/05104
Date: 17 December 2018

Dear Mr Russell

REDEVELOPMENT FOR CLASS C3 RESIDENTIAL (94 UNITS) & CLASS A1 RETAIL USES, INCORPORATING DEMOLITION WORKS AND THE CONSTRUCTION OF NEW BUILDINGS, WITH ASSOCIATED WORKS AND INFRASTRUCTURE. SEE ACCOMPANYING SCHEDULE FOR FULL DESCRIPTION OF DEVELOPMENT.

FORMER MID SUFFOLK DISTRICT COUNCIL OFFICES & ASSOCIATED LAND, 131 HIGH STREET, NEEDHAM MARKET, IP6 8DL

Thank you for your consultation dated 29 November 2018. We have reviewed the application as submitted and have no objections provided the conditions outlined below on contaminated land are included should the permission be granted.

Groundwater and Contaminated Land

The site is located within source protection zone 2 and a drinking water protection zone. Superficial geology is Kesgrave (Secondary A aquifer), above Lowestoft formation (secondary undifferentiated). The bedrock geology is made up of chalk (a principal aquifer) which was not encountered within 5 meters from the surface.

We have reviewed the Phase 1 and 2 Geo-Environmental Assessment by REC, dated July 2018. We note the results of soil tests in section 9.1 identify some relatively marginal exceedances of metals and PAH. The results of groundwater tests show relatively minor exceedances of metals and hydrocarbons.

We agree that the groundwater comments in the report that the identified groundwater is likely to be perched and the cohesive nature of the Lowestoft formation is also likely to contain any contaminants within the surface environment. Based on the information provided we therefore agree that the site can be considered a lower risk to groundwater. We note remediation of soils are proposed and responsible removal of the diesel storage tank to be undertaken. We would wish to be consulted if further contamination is identified.

Surface Water Drainage

We note comments from the Flood Risk Assessment and Drainage Strategy by MLM

Environment Agency
Iceni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506

www.gov.uk/environment-agency

Cont/d..

Group (dated November 2018), that infiltration drainage via shallow soakaway is not proposed due to the cohesive nature of the surface geology. We would wish to be consulted if the proposals change.

Section 11.0 of the REC report that deep-borehole soakaways may be considered to drain surface water. Given the presence of surface contamination and the principal aquifer located beneath the site we would also wish to be consulted if this method of disposal were to be used.

We recommend the conditions below are attached to any planning permission granted:

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason

To protect and prevent the pollution of the water environment (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses) in line with National Planning Policy Framework (NPPF; paragraphs 170 and 178), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater Protection Position Statements (2017) A4 – A6, J1 – J7 and N7.

National Planning Policy Framework (NPPF) paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 178).

Condition

No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

Infiltration through contaminated land has the potential to impact on groundwater quality.

Condition

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no

resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

The National Planning Policy Framework paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Further advice can be found within the technical appendix at the end of this letter.

We trust this advice is useful.

Yours sincerely

Mr Liam Robson
Sustainable Places - Planning Advisor

Direct dial 020 8474 8923

Direct e-mail Liam.Robson@environment-agency.gov.uk

cc Lawson Planning Partnership Ltd

Technical appendix

Advice to Applicant / LPA Sustainable Drainage Systems (SuDS) informative

1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
2. Infiltration SuDS have the potential to provide mobilise pollutants and must not be constructed in contaminated ground. They would only be acceptable if a site investigation showed the presence of no significant contamination.
3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual ([CIRIA C753](#), 2015), Guidance on the Construction of SuDS C768 and the [Susdrain website](#).

For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2017), in particular Position Statements G1 and G9 – G13 available at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

We recommend that developers should:

- 1) Refer to our '[Groundwater Protection](#)' website;
- 2) Refer to our [CL:AIRE Water and Land Library \(WALL\)](#) which includes the risk management framework provided in [CLR11, 'Model Procedures for the Management of Land Contamination'](#), when dealing with land affected by contamination, and also includes the [Guiding Principles for Land Contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health;
- 3) Refer to our [Land Contamination Technical Guidance](#);
- 4) Refer to '[Position Statement on the Definition of Waste: Development Industry Code of Practice](#)';
- 5) Refer to British Standards BS 5930:1999 A2:2010 *Code of practice for site investigations* and BS10175:2011 A1: 2013 *Investigation of potentially contaminated sites – code of practice*
- 6) Refer to our '[Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination](#)' National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of '[Piling Into Contaminated Sites](#)';
- 7) Refer to our '[Good Practice for Decommissioning Boreholes and Wells](#)'.
- 8) Refer to our '[Dewatering building sites and other excavations: environmental permits](#)'

guidance when temporary dewatering is proposed

Consultation Response Pro forma

1	Application Number	DC/18/05104	
2	Date of Response	18/12/2018	
3	Responding Officer	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to conditions	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle to manoeuvre around attached are the vehicle specifications.</p> <div style="text-align: center;">  OLYMPUS - 8x4MS Wide - Euro 6 - Smo </div> <p>Wheeled bin presentation points are required to be plotted on a map for approval, attached is our suggested presentation points.</p> <div style="text-align: center;">  Presentation points.pdf </div> <p>Ensure that the bin store for the flat off the High Street is sufficient to accommodate two sets of 1100l and 1 x 240l glass bin. The egress must be flush and a dropped curb on to the High Street so that manoeuvring wheeled bins is completed with ease. The bin store for the flats off Hurstlea Road side has sufficient storage space for 3 sets of 1100l and a 240l glass bin, ensuring that there is a flush egress.</p>	
6	Amendments, Clarification or Additional Information Required (if holding objection)		

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

	If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	
7	Recommended conditions	Meet the conditions in the discussion.

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

Your Ref:DC/18/05104
Our Ref: SCC/CON/4988/18
Date: 7 January 2019



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Mark Russell

Dear Mark

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/18/05104

PROPOSAL: Planning Application. Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure. See accompanying schedule for full description of development

LOCATION: Mid Suffolk District Council Council Offices 131 High Street Needham Market Ipswich IP6 8DL

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

COMMENTS

The parking provision may give the minimum number of parking places required but there are a few points that need to be addressed prior to full application. The main areas of concern are listed below:

- The visitor parking provision (near Plots 6.0.13 to 18 and 6.0.2 to 6) are shown in lay-bys; this is not in line with Suffolk Guidance for Parking 2015. They are on bends in the road or they near junctions and parking places from dwellings so will interfere with sight lines and manoeuvring requirements for these areas.
- Access for a number of plots are also too close to junctions or bends therefore not gaining sufficient visibility.
- The parking places for many of the Plots are all at the back of the dwellings; experience has shown that residents tend to park as close as possible to the entrance of their house. Therefore, it is considered the parking allocation is not 'convenient' and may lead to parking on footways,

verges and service strips (the plots fronting Hurstlea Road are protected by existing waiting restrictions).

- parking for Plots 3.0.1 to 4, 6.0.13 to 18 and 6.0.2 to 6 do not have room for turning within their curtilage therefore vehicles will not be able to enter and exit the highway in a forward-facing gear.
- The parking for Plots 1.0.1 to 1.2.4 is adjacent to public parking area; this will need to be managed as the public may use the private area.

CONDITIONS

Should the Planning Authority be minded to grant planning approval the Highway Authority in Suffolk would recommend they include the following conditions and obligations:

V 1 - Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 0203-WSP-XX-DR-00004 P02 and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

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.

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.

D 2 - Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

B2 - Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins 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 for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

HGV – 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:

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

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

TP - Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP) in accordance with the Travel Plan dated August 2016. Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus timetable information, car sharing information, personalised Travel Planning and a multi-modal travel voucher.

Reason: In the interest of sustainable development as set out in the NPPF, and strategic objectives SO3 and S06 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

Note: The Resident Travel Pack should be produced in accordance with Suffolk County Council's Travel Plan Guidance

(www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/information-for-developers)

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 secure electric vehicle charging points and 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 enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

NOTES

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.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure



FAO: Planning Department,
Babergh & Mid Suffolk District Councils

Ref: DC/18/05104
Date: 08/01/2019

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: Proposed redevelopment- Mid-Suffolk District Council Offices, Needham Market

The application is for the redevelopment of the former Mid-Suffolk District Council Offices.

The main heritage assets for consideration are Grade II listed 131 High Street (List Entry ID: 1254005). Part of the site is also located within the Needham Market Conservation Area.

This site has been through extensive pre-application consultation and I have no objection to the principle of this proposal.

I do have concerns about the loss of the historic redbrick garden wall on the south side of Hurstlea Road as this is the only surviving element of the former boundary. Pre-application advice suggested this feature should be incorporated into the scheme and this has unfortunately not been realised. This is shown in the plans as demolished, as is the wall of the historic pond which had previously been recommended to be used as part of a SuDS scheme. As such harm is identified to both these features under paragraph 197 of the NPPF.

The former orchard wall has been retained in the proposal. Whilst it is considered a more open layout could be adopted, this scheme is considered acceptable.

The rearrangement of the road layout is considered to be an improvement to previous iterations. The space to the rear of Number 131 is considered to be an enhancement to the setting of the heritage asset. The location of the proposed new block to the west of Number 131 is also considered acceptable, with planning conditions to ensure the quality of new buildings are acceptable.

I do not support the roof extension to the annex of Number 131. This will detract from the setting of the listed building and the character and appearance of the conservation area. This harm could perhaps be mitigated by stepping back the proposed extension and reducing its scale.



No access was permitted to the basement of No 131 during site visit and as such I make no comment on this aspect of the application.

The alterations to Number 131 are generally acceptable and reflect the results of pre-application discussions, with exception to the following:

- The blocking of the ground floor hallway is harmful and I recommend this aspect of the scheme is altered;
- It is unclear in the proposed plan where kitchen utilities will be placed and how these will be serviced, I recommend further information is sought;
- Further details are required pertaining to the partition/screen to the second floor stair, as discussed at pre-app;
- It has been assumed the windows will not be altered, this may need clarifying;
- The location of the new second floor stair would have been better located in the west bay as this intrudes on the original plan form.

Recommended conditions to any approved application pertain to:

- A Scheme of archaeological building across the whole site commensurate with a 'Level 3 Record' as outlined in Historic England Guidance *Understanding Historic Buildings*;
- A schedule of repairs to the former orchard wall;
- Condition requiring details of materials (bricks and windows for new extension to Number 131);
- Details of service runs in Number 131;
- Details of interior fixtures, fittings and partitions to Number 131;
- Details of conservation roof lights to Number 131;
- Materials for new buildings to rear of Number 131;
- Details of landscaping and public realm around listed building; and
- Existing doors within Number 131 will be locked shut, not removed.

Overall the changes to Number 131 present a significant improvement from previous iterations and in principle I support them. Further details are required pertaining to some items noted above.

However, overall, as the application currently stands I suggest there would be less than substantial harm to the listed building and conservation area and as such paragraph 196 of the NPPF is relevant as is paragraph 197 considering the loss of the historic garden wall. I do however feel this harm can be mitigated with change to the existing scheme.

Yours sincerely,

Tim Murphy IHBC MCIfA
Historic Environment Manager
Place Services

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

From: Alicia Ridout [<mailto:Alicia.Ridout@purcelluk.com>]

Sent: 24 January 2019 12:10

To: Mark Russell; Tim Murphy, Historic Environment Manager

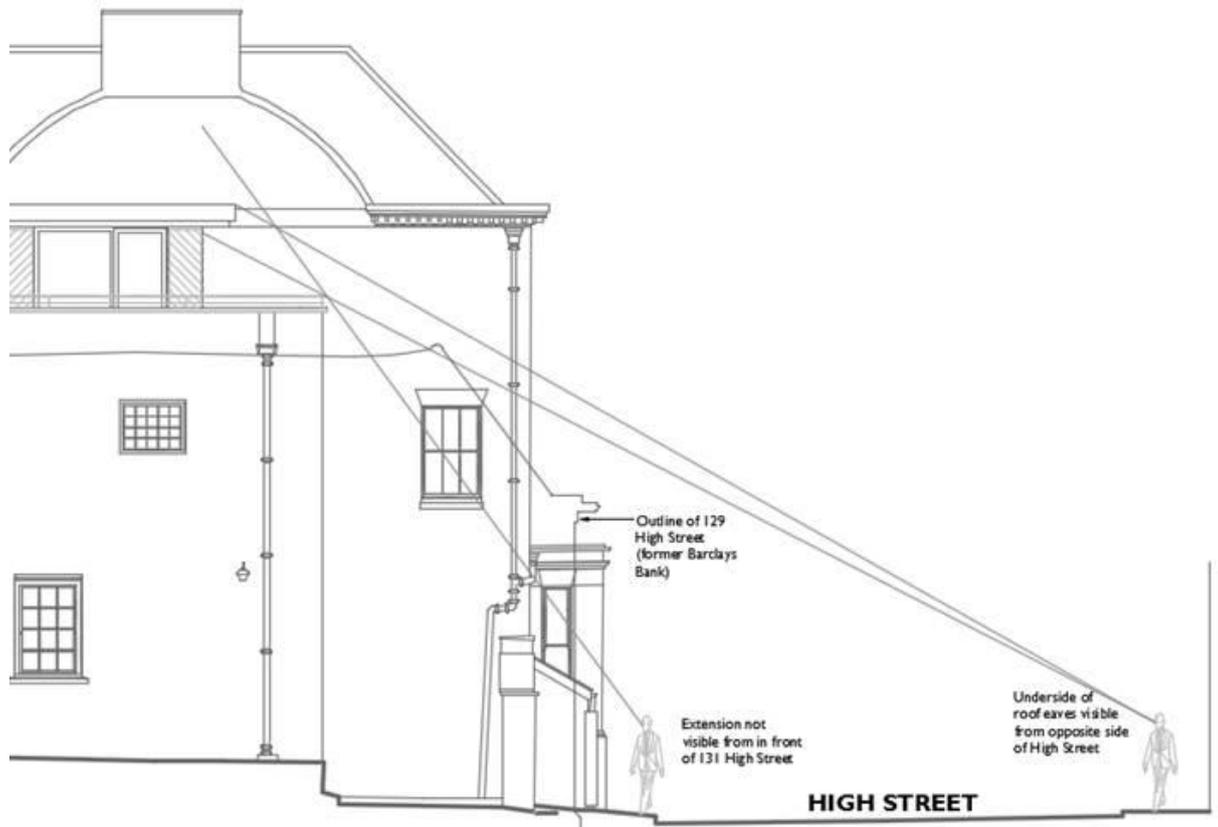
Cc: Peter Buist; Sandra Green; James Lawson; Cox, Jonathan; Downes, Nigel

Subject: Former Mid-Suffolk District Council Offices Redevelopment - Needham Market

Dear Mark and Tim,

For your consideration, I have attached updated drawings for the redevelopment of the former MSDC offices in Needham Market. These drawings have been updated to consider the following points raised by yourselves and other consultees:

- Tree T15 (tree officer): this tree has been reinstated on the drawings, to be retained (large tree bordering the turning head by the retail unit service yard)
- Tandem parking spaces (Mark): these were intended to be parking spaces 1 and 2 for units 6.0.9 – 6.0.12, as these face Hurstlea Road and so cannot have parking to the front of the properties. We have revised the drawing to remove the 4 tandem parking spaces, which leads to a shortfall of parking spaces for those units, based upon Mark's comments that the central urban setting may justify a small reduction in parking numbers.
- Out of context 'sawtooth' appearance of gabled terraces (Mark): These have been adjusted so that there are now no more than two gables in a terrace of houses. On some of the longer terraces we have kept the gable to each of the end units to 'punctuate' the terrace.
- Blocking of the ground floor hallway (Tim): proposals have been revised to show an obscure glazed screen in this location so that the historic permeability of the space can be read. **I am Comfortable with this**
- Rooftop extension to the annex of 131 High Street (Tim): The required head room of the apartments within the rooftop extension means that the roofline cannot be lowered any further. However, we have been able to pull the extension away from the High Street side by a further 500mm, so there is now a 2.3m distance between the existing front wall of the annex and the new front wall of the extension. This means that only the eaves of the extension will be visible from the opposite side of the street. It is also over 6m behind the line of the front wall of 129 High Street, whose long roofline along Barrett's Lane will obscure the visibility of the roof extension in longer views from the High Street. **This appears to be acceptable but a marked up photograph showing views would be useful for this element to demonstrate no harm.**



We can also make the following observations in response to Tim’s comments:

“Further details are required pertaining to the partition/screen to the second floor stair, as discussed at pre-app.”

This will be a replacement of the existing partially glazed screen in more modern, robust materials. An element of obscure glazing will be retained to allow daylight into the stairwell. **I am comfortable with this but would recommend the detail is conditioned.**

“The location of the new second floor stair would have been better located in the west bay as this intrudes on the original plan form.”

This room has had all of its historic features removed so while its original scale is still perceptible, its historic character is lost. To locate the stairs in the western room would require a new opening through the historic spine wall, which we consider would be more harmful than inserting the stair within the space. **Whilst this is still harmful (a new stair in the rear portion of the building would be more sympathetic)-Given the overall scheme I think this would be an acceptable compromise in the heritage balance.**

Please note that WSP are seeking to liaise with Sam Harvey directly regarding Highways comments, as soon as possible. Should any additional drawing changes be required as a result of those discussions, any affected drawings will be revised and re-issued.

I would appreciate any further comments that you may have on the attached and above notes as soon as practicable.

Kind regards,

ALICIA RIDOUT BA (Hons) MArch PGDip RIBA Senior Architect

From: David Pizzey
Sent: 03 December 2018 11:19
To: Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: DC/18/05104 Former Mid Suffolk District Council Offices & Associated Land

Mark

Please refer to my previous comments regarding DC/18/03228. However, I note this revised application now proposes removal of tree T15, a very large mature Lime. This is a 'category A' specimen of high amenity value that contributes significantly to the character of the local area and therefore should be accommodated as part of the layout design.

Regards

David

David Pizzey FArborA
Arboricultural Officer
Tel: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils – Working Together

From: Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 04 December 2018 11:29
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: Consultation response DC/18/05104

Dear Sir/Madam,

Application ref: DC/18/05104
Our ref: 266340

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully,

Danielle Priestner
Consultations
Natural England
Hornbeam House, Electra Way
Crewe Business Park
Crewe, Cheshire CW1 6GJ

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Mark Russell – Principal Planning Officer

From: Julie Abbey-Taylor, Professional Lead – Strategic Housing

Date: 14/12/2018

SUBJECT: - **Application Reference: DC/18/05104**

Proposal: Application for detailed Full planning for the demolition of the former Council offices and the erection of 94 dwellings and Class A1 retail uses with associated works and infrastructure at former MSDC HQ, Hurstlea Road, **Needham Market, IP6 8DL**

Key Points

1. Background Information

A development proposal for 94 residential dwellings inclusive of a conversion of Hurstlea House which will provide 10 dwellings and retail Class A1.
This is an open market led development for 94 dwellings and should provide 35% affordable housing to be provided on site = 33 dwellings. 10 affordable homes are proposed = 10.6%, therefore not policy compliant

2. Housing Need Information:

- 2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.
- 2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**
- 2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2	
Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%
4+	2%

- 2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

Ref3
Estimated proportionate demand for all tenure new housing stock by bedroom number

Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa. **740** applicants registered for affordable housing in Mid Suffolk at Oct 2018.

2.8 The Council's Choice Based Lettings system currently has circa.90 applicants registered for affordable housing, who are seeking accommodation in Needham Market. This site is located within the settlement boundary of Needham Market town and will be providing housing to meet district-wide housing needs.

The total residential proposals would provide a range of unit types and sizes as summarised below;

- 13 x 1 bed apartments;
- 14 x 2 bed apartments;
- 3 x 3 bed apartments;
- 43 x 2 bed houses;
- 18 x 3 bed houses;
- 3 x 4 bed houses;

3. Preferred Mix for Open Market homes –

The residential proposals would provide a mix of tenures as summarised below;

84 x 1, 2, 3 & 4 bed market dwellings comprising–

12 x 1 bed flats (14.2%)

8 x 2 bed flats (9.5%)

3 x 3 bed flats (3.5%)

41 x 2 bed houses (48.8%)

18 x 3 bed houses (21.4%)

3 x 4 bed houses (3.5%)

The open market mix is balanced between the provision of 1, 2, 3 and 4 bed roomed properties, with the greatest provision being 2 bed roomed, which within Needham Market is in demand and will help to offer dwellings aimed at older home owners who wish to downsize or relocate to a town and access amenities and facilities, as well as be available for first time buyers and younger/smaller households. It is disappointing that there are no bungalows included on this site as they are in high demand within the open market and would have sold well, however it is

recognised that inclusion of bungalows would mean a probable reduction in overall number of dwellings due to their increased land take.

4. Proposed mix for Affordable Housing

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows circa.90 applicants registered who have a connection to Needham Market.

4.2 **10.6%** of the proposed dwellings on the development are for affordable housing. The 10 dwellings have been offered in the form of: -

- 3 x 2 bed 4-person houses @ 78 sqm
- 1 x 1 bed 2-person flat @ 51 sqm (NDSS is for 50sqm)
- 2 x 2 bed 3-person flats at 59 sqm (NDSS is for 61 sqm but 2 bed 3-person flats are not what we normally require.
- 1 x 2 bed 3-person flat @ 63sqm (see above comment)
- 1 x 2 bed 4-person flat @ 65 sqm (NDSS should be 70 sqm too small currently)
- 2 x 2 bed 4-person flats @ 68 sqm (NDSS should be 70 sqm too small currently)

On contacting the applicant to enquire about property sizes, the architect has now responded and can revise the GIFA of the apartments as detailed in the table below.

Unit Ref:	Type	Accommodation	Current Area (sqm)	NDSS Requirement (sqm)	Notes
10.1.1	Apartment	2 bed 4 person	68	70	Move party walls with 10.1.2 and 10.1.5 to increase to 70sqm
10.1.2	Apartment	1 bed 2 person	51	50	Reduced to accommodate growth of 10.1.1 and 10.1.3
10.1.3	Apartment	2 bed 4 person	68	70	Move party walls with 10.1.2 and 10.1.4 to increase to 70sqm
10.1.4	Apartment	2 bed 3 person	59	61	Extend apartment footprint into part of balcony to increase to 61sqm
10.1.5	Apartment	2 bed 3 person	59	61	Slightly extend external wall towards balcony to increase area to 61sqm.
10.1.6	Apartment	2 bed 3 person	63	61	Reduced to accommodate growth in apartment 10.1.7.
10.1.7	Apartment	2 bed 4 person	65	70	Move party wall with apartment 10.1.6 and rearrange circulation route to increase to 70sqm.

The alterations to the submitted plans will result in the affordable homes being: -

1 x 1bed/2person apartment @ 50sqm

3 x 2bed/3person apartments @ 61sqm

3 x 2bed/4person apartments @ 70 sqm

3 x 2 bed/4person houses @ 78 sqm

Dwelling areas must be in compliance with the NDSS Standards in accordance with the client's brief. **The above mix will need to be included in a S106 agreement.**

This proposal is not compliant with saved policy H4 Affordable housing. The application refers to a financial viability appraisal to support that no more than 10.6% affordable housing can be provided on site albeit the planning statement advises the application cannot afford any on-site affordable housing but is offering the 10.6 as an "at risk" voluntary proposal. To date the financial viability appraisal has not been submitted to the LPA for consideration.

Recommendation: - Holding objection subject to submission and scrutinization of the Financial Viability appraisal to establish the level of affordable housing on site.

5. Other requirements for affordable homes:

- Properties must be built to current Homes England requirements and comply with the NDSS sizes.
- The affordable homes must be transferred freehold to an approved Registered Provider and will advertise the rented dwellings through the Gateway to Homechoice choice-based lettings system and will market the shared ownership dwellings through the Homebuy agent for Suffolk.
- Initial shares for shared ownership dwellings to be capped at 70%.
- All flats must be in separate blocks and capable of freehold transfer to an RP.
- Adequate parking provision is made for the affordable housing units in accordance with the SCC parking standards.

Julie Abbey-Taylor, Professional Lead – Strategic Housing.

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

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Endeavour House
8 Russell Road
Ipswich IP1 2BX.

Enquiries to: Hannah Cutler
Direct Line: 01284 741229
Email: Hannah.Cutler@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_05104
Date: 06/12/18

For the Attention of Mark Russell

Dear Mr Isbell

Planning Application DC/18/05104 – Former Mid Suffolk District Offices & Associated Land, Needham Market: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record, partially within the historic medieval core of Needham Market (NDM 026). A desk-based assessment (Purcell, October 2018) submitted with the application showed that there is potential that archaeological remains may survive from earlier periods; any surviving remains may be of some significance at a local to regional level. Thus, groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the

site investigation

e. Provision to be made for archive deposition of the analysis and records of the site investigation

f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to, and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made based on the results of the evaluation. **If evaluation takes place after demolition of existing buildings, the buildings will have to be demolished to ground level with no grubbing out of foundations.**

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

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Dr Hannah Cutler

Archaeological Officer
Conservation Team

Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
IP1 2BX

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

Your Ref:
Our Ref: FS/F210084
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 06/12/2018

Dear Sirs

Former Mid Suffolk District Council Offices and associated land
Planning Application No: DC/18/05104
Hydrants are required for this development
(see our required conditions)

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 Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. 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.

Sprinklers Advised

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

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

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: jameslawson@lppartnership.co.uk

Enc: Sprinkler information

Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
IP1 2BX

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: 6 December 2018

Planning Ref: DC/18/05104

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Former MSDC Offices and associated land, High Street, Needham Market IP6 8DL
DESCRIPTION: 94 flats and retail
HYDRANTS REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority require 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, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.

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

OFFICIAL

From:Jennifer Candler

Sent:29 Nov 2017 09:24:28

To:Gemma.Pannell@babberghmidsuffolk.gov.uk,

Subject:Redevelopment of Mid Suffolk District Council Offices, Needham Market - Retail Sequential Test

Attachments:

Gemma,

Please see the following comments from strategic planning policy on retail sequential test which has been produced for pre application purposes on behalf of Mid Suffolk District Council.

Unfortunately on the basis of the information the strategic planning policy team would object to the content of the assessment. The approach taken in the study with regard to impact assessment is contrary to the Council's published evidence (Babergh and Mid Suffolk Joint Town Centre and Retail Study, Carter Jonas, 2015) which is a material consideration. The work is being undertaken on behalf of MSDC yet the approach being applied is completely inconsistent with the endorsed position of the Council and the recently completed Retail Study.

The Council have proposed the study recommendations in our emerging LP which has been formally endorsed by BDC & MSDC through Full Council. On the understanding that Lawson Partnership are instructed by the Council it would be inappropriate to apply a different threshold to that endorsed by the instructing organisation. Any alternative would undermine the agreed position of the Council, the emerging policy and the evidence. Consequently the 400m2 threshold should be applied in this instance and retail impact assessment undertaken on this application, consistent with the recommendations in the Council's specialist evidence which has made recommendations based upon local circumstances.

Regards

Jennifer

Jennifer Candler

Spatial Planning Policy

[Babergh District Council](#) & [Mid Suffolk District Council](#) - Working Together

T. Ext. 07860 827028

E. jennifer.candler@babberghmidsuffolk.gov.uk



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

21/12/2018

For the attention of: Mark Russell

Ref: DC/18/05104; Former Mid Suffolk District Council Offices & Associated Land, 131 High Street, Needham Market, IP6 8DL

Thank you for consulting us on the planning application for the redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure. See accompanying schedule for full description of development.

This letter sets out our consultation response on the landscape impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site.

Recommendations

We provided initial comments at pre-app stage with regards indicative landscape layout and public realm. Because part of the site area is within the Conservation Area we expect the proposal to achieve certain levels of amenity through high quality public realm, green infrastructure and to conserve and enhance the character of the area.

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

- 1) As highlighted at pre-app stage, the site has historic landscape features. Part of the gardens to the south and western pond has not been retained incurring in the loss of a significant landscape feature in terms of amenity, cultural and local history values, including the removal of a category A tree. The current design layout is not sympathetic to the existing landscape character and a better buffer/transition between both areas is required. A landscape buffer will be required between proposed retail unit and Hurstlea Road to soften the visual impact and compensate for the loss of green space. A more sensitive design approach in the relationship between this green public open space and the proposed retail unit is required.
- 2) A large number of existing trees will be removed to accommodate the development proposal. New tree planting has been proposed on both public and private land. We feel however that the routes within the central area of the development are lacking tree planting on the public realm. Additional tree planting on the public realm will be required to achieve a satisfactory level of amenity on the development and to preserve tree planting in the long term.

- 3) Boundary treatment within the development layout and along access routes and surface materials will be key to deliver a high quality public realm. Landscaping should be used to soften hard boundary treatment when fronting onto the public realm.

Should the application be granted, we will expect the recommendations above to be considered and embedded in the amended layout design.

N.B. Detailed landscape plans and specifications that clearly set out the existing vegetation to be removed and retained, proposed hard and soft landscaping, boundary treatments and landscape management plan will need to be submitted as part of the planning conditions below:

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: HARD AND SOFT LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site including fence type, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, number, location and sizes of the proposed planting. The plans should clearly show the position of new fencing in relation to existing and proposed planting.

Reason - In the interest of visual amenity and the character and appearance of the area. This condition is required to be agreed prior to the commencement of any development to ensure matters of tree and hedgerow protection are secured early to ensure avoidance of damage or loss due to the development and/or its construction. If agreement was sought at any later stage there is an unacceptable risk of loss and damage to important trees and hedgerow that would result in harm to amenity.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 5 years.

Reason - To support plant establishment and ensure appropriate management is carried out and to maintain functionality and visual aesthetic.

Kind regards,

Almudena Quiralte CMLI
Landscape Architect Consultant
Telephone: 03330136858
Email: almudena.quiralte@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.

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
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Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

11/02/2019

For the attention of: Mark Russell

**Ref: DC/18/05104; Former Mid Suffolk District Council Offices & Associated Land,
131 High Street, Needham Market, IP6 8DL**

Reason(s) for re-consultation: Amended plans received by the Local Planning Authority on 24/01/2019

Review of amended plans

We welcome the reinstatement of the category A tree T15. However, we are concerned about the protection of this tree within the proposed layout design. Sensitive surface materials and construction methods should be used within the root protection area of this tree to ensure it does not get damaged or affected by the development. The layout as it currently stands is not satisfactory.

In addition, our previous comments (dated 21/12/2018) still stand. In particular, our recommendation to create a better transition between the existing green open space and retail area to the south of the site.

Kind regards,

Almudena Quiralte BA (Hons), Dip LA, CMLI
Landscape Architect Consultant
Telephone: 03330136858
Email: almudena.quiralte@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.





10 December 2018

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

By email only

Dear Mark,

Thank you for requesting advice on this 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/18/05104

Location: Former Mid Suffolk District Council Offices & Associated Land 131 High Street Needham Market IP6 8DL

Proposal: Planning Application. Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure. See accompanying schedule for full description of development.

Thank you for consulting Place Services on the above application.

No objection subject to securing biodiversity mitigation and enhancement measures

Summary

We have reviewed Ecological Impact Assessment (Adonis Ecology Ltd, August 2017) Breeding Bird Survey (Adonis Ecology Ltd, September 2018) Bat Survey (Adonis Ecology Ltd, November 2018) provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species / habitats.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We support the reasonable biodiversity enhancements, which should also be secured by a condition of any consent.

Despite the lack of roosting bats observed using the historical section of the former council offices during the nocturnal surveys, given that a maternity roost had been known on site for approximately



30 years, we agree that this building could be used by bats again in the future. We consider that the impact avoidance measures identified in paragraph 5.4.1 of the Ecological Impact Assessment are sufficient for any works to the historical part of the site to reduce any risk of impact to bats and/or roosting bats.

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

The ecological mitigation and enhancement measures identified in Ecological Impact Assessment (Adonis Ecology Ltd, August 2017) Breeding Bird Survey (Adonis Ecology Ltd, September 2018) Bat Survey (Adonis Ecology Ltd, November 2018) should be secured and implemented in full. This is necessary to conserve Protected and Priority species.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

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

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL IMPACT ASSESSMENT RECOMMENDATIONS

"All mitigation measures and/or works shall be carried out in accordance with the details contained in Ecological Impact Assessment (Adonis Ecology Ltd, August 2017), Breeding Bird Survey (Adonis Ecology Ltd, September 2018) and Bat Survey (Adonis Ecology Ltd, November 2018), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: To conserve Protected and Priority species and 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).

2. PRIOR TO COMMENCEMENT: SUBMISSION OF A COPY OF THE EPS LICENCE FOR BATS

"The following works to demolish the 'Garage' and replace it with new residential dwellings shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorizing the specified activity/development to go ahead; or*
- b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence."*



Reason: To conserve Protected and Priority species and 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 and s17 Crime & Disorder Act 1998.

3. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY

“A Biodiversity Enhancement Strategy for Protected/Priority species shall be submitted to and approved in writing by the local planning authority, following the details contained within the Ecological Impact Assessment (Adonis Ecology Ltd, August 2017), Breeding Bird Survey (Adonis Ecology Ltd, September 2018) and Bat Survey (Adonis Ecology Ltd, November 2018).

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.*

The works shall be implemented in accordance with the approved details and shall be retained in that manner 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).

Please contact us with any queries.

Yours sincerely,

Hamish Jackson BSc (Hons) GradCIEEM MRSB

Junior Ecological Consultant

Hamish.Jackson@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.

Dear Mark

EP Reference : 252368

DC/18/05104. Air Quality

Mid Suffolk District Council, 131 High Street, Needham Market, IPSWICH, Suffolk, IP6 8DL.

Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail uses, inc. demolition works and construction of new buildings, associated works & infrastructure. See accompanying schedule for full description of development.

Many thanks for your request for comments in relation to the above application . Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of air quality.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 07769 566988 / 01449 724715

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Dear Mark

EP Reference : 252369

DC/18/05104. Land Contamination

Mid Suffolk District Council, 131 High Street, Needham Market, IPSWICH, Suffolk, IP6 8DL.

Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail uses, inc. demolition & construction of new buildings, associated works & infrastructure. See accompanying schedule for full description of development.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I 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.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

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**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Email address: planning.apps@suffolk.nhs.uk
Telephone Number – 01473 770000

Your Ref: DC/18/05104

Our Ref: IESCCG/001218/NEE

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

07/12/2018

Dear Sirs,

Proposal: Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure. See accompanying schedule for full description of development.

Location: Former Mid Suffolk District Council Offices & Associated Land , 131 High Street, Needham Market, IP6 8DL

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating Ipswich & East Suffolk Clinical Commissioning Group (CCG).

Background

2. The proposal comprises a development of up to 94 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is one GP practice within a 2km radius of the proposed development. This practice(s) do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary of capacity position for healthcare services closest to the proposed development.

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Needham Market Country Practice	12,642	432.10	6,301	-435
Total	12,642	432.10	6,301	-435

Notes:

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
 2. Current Net Internal Area occupied by the Practice.
 3. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
 4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Needham Market Country Practice, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
 7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Babergh and Mid Suffolk District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

Chris Crisell

Estates Planning Support Officer

Ipswich and East Suffolk Clinical Commissioning Group

From: Chris Ward

Sent: 04 December 2018 10:20

To: Mark Russell <Mark.Russell@babberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/18/05104

Dear Mark,

Thank you for consulting me about the application for the proposed residential development at the Former Mid Suffolk District Council Offices in Needham Market. I can confirm that any Travel Plan related comments will form part of the formal Suffolk County Council Highway response that Sam Harvey is leading on to comply with internal protocol.

If this causes you any issues please let me know as soon as possible.

Kind regards

Chris Ward

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>



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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/18/05104

Referring to the planning application referenced above, dated 3 December 2018, application for the redevelopment for class C3 residential & class A1 retail uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure, Former Mid Suffolk District Council Offices & Associated Land, 131 High Street, Needham Market, IP6 8DL, 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.¹

¹ Where relevant, further information will be provided within Annex A.

Date: 4 December 2018	
Signature:	
Name: Mark Norman	Position: Spatial Planning Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
mark.norman@highwaysengland.co.uk	

Annex A

The proposal is remote from the SRN and is unlikely to result in a material change in traffic generations or impact.



Phil Kemp
Design Out Crime Officer Community Safety Unit
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street, Bury St Edmunds, Suffolk, IP33 2AP
Tele: 01284 774141 Fax: 01284 774130
www.suffolk.police.uk

PLANNING APPLICATION: DC/18/05104
PROPOSAL: Application for 94 residential units and Class A1 Retail Unit
LOCATION: Former Mid Suffolk District Council Offices, 131 High Street, Needham Market, IP6 8DL
APPLICANT: Mrs Anne Bennett Mid Suffolk District Council, Endeavour House, Ipswich
PLANNING OFFICER: Mr Mark Russell

Dear Mr Russell

Thank you for allowing me to comment on the above Planning Application for the proposed development of up to 94 residential units and a Class A1 Retail Unit at the former Mid Suffolk District Council Offices, 131 High Street, Needham Market, IP6 8DL.

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 1998.

I realise that further details will be forthcoming with regard to the internal layout of these properties and further details on the retail unit, however, the following points are of concern;

- a) **Six main areas with rear vehicle parking incorporated, where the rear parking by plot 6.08 will also compromise security for the rear of plots marked 6.04-6.07.**
- b) **The pedestrian access to the proposed development is very open.**
- c) **A number of parking areas do not have access to any surveillance from other properties.**
- d) **A number of parking spaces are situated a distance from their respective plots and may lead to occupants parking in other areas, or on the side of the road, or on grassed areas.**
- e) **The rear courtyard of the retail unit is positioned right next to the right of way footpath, opening up the area for offenders to access.**
- f) **Police prefer properties back to back, the properties earmarked around the northern area of the development at 4.01- 4.09 are not.**
- g) **There do not seem to be any garages incorporated and instead parking is either communal or comprises car ports. The police prefer garages to car ports, as they lack the security of a lockable garage.**

On a positive note it is good to note that the planners have stated within their Planning Statement (under Layout at Para 3.29, page 9) how the proposed apartment block will be sited to "benefit from active surveillance", it is hoped that this will be the case as the police actively promote the planning of developments to provide as much natural and formal surveillance of an area as possible.

I hope the applicant applies for Secured by Design (SBD) accreditation at this site as a means to provide an indication of the quality of the development envisaged, or at the very least seek SBD accreditation for the proposed 10 affordable housing units.

It is now widely accepted that a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour. Based on the area in question, neighbouring sites, evidence of previous criminal and anti-social activity in the locale and examination of all other available factors, my recommendations are made below:

1.0 GENERAL COMMENTS ON PROPOSED PLAN AND INITIAL CONCERNS RAISED IDENTIFIED IN MORE DETAIL

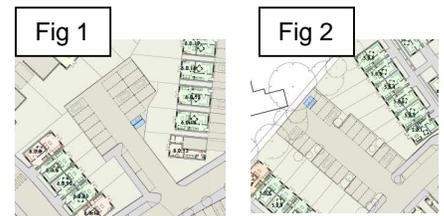
1.1 I appreciate that designing parking to accommodate enough spaces for both home owners' and visitors along with allocating garages for every household can be a challenge. Police, however, prefer that all properties have a garage and that garages are placed immediately next to properties. Set-back garages tend to be before rear gates and have a frontal area where there is a real lack of surveillance allowing an offender to walk into such areas and up to rear gates unseen in order to then break in. Where garages and car parking spaces are set back or the other side of the road to a plot, police prefer active windows to be incorporated that look onto these areas to provide surveillance for a house holder and to deter unauthorised movement. Secure By Design (SBD) New Homes 2016 section 1, at para 16 entitled "Car Parking", (para 16.1- 16.2 and 16.5-16.7 pages 22-23 refers). Along with section 3 at para 52, also entitled "Car Parking", (para 52.1-52.2, pages 62-63 refers).

1.2 Six areas within this development have rear parking incorporated, (as shown below).



1.3 Police do not recommend the incorporation of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, antisocial behaviour, (including the gathering of people) and graffiti, as these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties.

1.4 The rear parking, with no surveillance by allotted plot reference 6.08, heightens the risk of an offender gaining access into the rear of plot references 6.04 - 6.08 and is a concern if left in its current format. If rear parking areas such as the two areas shown right remain in place, then an alternative to secure these areas could be to install security gates. The gates would need to be electronic gates that are self-closing. The gates for the image shown at fig 1 could be inward opening gates, but if gates were implemented for the area in fig 2, they would need to be sliding gates.



1.5 If vehicle gates are installed, it is recommended that they are capable of being remotely operated by the driver sitting in their vehicle. The operation speed of the gates shall be as quick as possible to avoid tail gating by other vehicles and be certified to;

- LPS1175: Issue 7.2 Security Rating 1 or above, or;
- STS 202, BR1, or;
- LPS2081, SR A

1.6 There should be no significant recesses to negate an offender being able to climb under or over them. Any automated mechanism should be installed in line with BS EN 13241-1 safety standards, in order to meet Health & Safety regulations.

1.7 If the planners cannot change the location or move the angle of properties to allow surveillance of these areas and if these areas are not well lit, during the winter months there will be no surveillance or reassurance for vehicle owners to feel safe to want to

park in such locations and then have to walk to their respective properties. If allocated users do not wish to park within such areas, it tends to lead to vehicles parked in unauthorised areas, which can lead to confrontation with other users, block footpaths, or cause surface damage to open space green areas. If these areas are to remain as they are, they need good LED lighting, in accordance with BS5489:2013 and at least some surveillance from the rear of neighbouring properties, with the rear fencing capped to 1.5m and topped with 300cm trellis.

- 1.8 A number of parking spaces allocated that again have no active surveillance, either from their respective properties or neighbouring properties are at the following locations shown below;



- 1.9 In order to reassure visitors to want to use retail and public car parks there is a police owned 'ParkMark' initiative further details can be found using the following link: <http://www.parkmark.co.uk/> (SBD Commercial 2015 refers at page 35 Para 46). It is strongly recommended that Park Mark Accreditation is sort for these areas.

- 1.10 The area around the present development already has a number of areas that allow easy access. This development opens up further access areas, allowing at least 13 movement locations around the whole perimeter, with the possibility of further unauthorised man made unauthorised access points. I realise that in the current climate of promoting people to walk or cycle instead of using a vehicle, there is demand for easy access, but easy access opens such areas to offenders too, along with choices as to how to exit the area at speed. It would be preferable if some of these walkways were either removed, or secured by lockable gates to only allow access to local residents. (SBD New Homes 2016 pages 21-22, para 13.1-13.4 refers).



- 1.11 If all these pathways need to be put in place, then flow restrictors at either end would assist, such as those pictured right:



- 1.12 If properties cannot be re-angled to provide surveillance of these areas, then they need to be well lit in order to provide some reassurance to users.

- 1.13 The footpath to the east of the proposed three storey block entitled 9.01- 9.04 that will link Crowley Park onto Hurstlea Road, needs to be well lit and the vegetation either slow growing or regularly cut back, in order to allow users to want to feel safe to use it and negate the fear of crime occurring within this area. Using the principles of "Secure By Design New Homes 2016." I urge the developers to make the width of all main communal footpaths at least 3m across to allow people to pass one another without

infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles. It is further recommend that adequate overhead lighting is installed to BS5480:2013 standards. Note bollard lighting is not compliant with Secure By Design principles and BS5489:2013 standards, as it does not give sufficient light at the right height to aid the reduction of the fear of crime as they do not light people's faces sufficiently. (SBD 2016, pages 14-17 at Paras 8.1-8.19 refers).

- 1.14 Police prefer back to back gardens to increase security and surveillance and reduce the necessity for alleyways/walkways that can open up plots to anyone, including thieves. It is noted that plot references 4.01 – 4.09 (pictured right) are not back to back and have access areas from all sides, making these plots more susceptible to the risk of crime occurring.



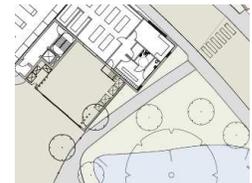
- 1.15 It is noted that the parking for within this development is either through allocated off road parking spaces or car port areas, pictured right. The police do not recommend car ports, as they do not provide the security to that of a garage. I note from the picture that the car ports have gates in front of them. While garaging is preferred if all car ports have lockable gating this will mitigate the possibility of car crime. However, the gates need to have reliable locking mechanisms that cannot easily be forced and the gates should have no recesses that would allow an offender to climb under or over them.



- 1.16 I would like confirmation how the perimeter bordering properties on the western side will comprise and how the rear perimeters of all properties will be designed. Police prefer rear gardens to be enclosed on all sides with 1.8m close boarded fencing. As stated if the rear parking must remain then police prefer rear fencing to comprise 1.5m close boarded fencing, topped up with 300cm trellis in order to retain a secure height for the fence, but allow some surveillance of the rear parking area.

- 1.17 I would like further clarification how the cycle storage areas will comprise and what security measures will be envisaged? (SBD New Homes 2016, paras 53.1 – 54.3, pages 64-65 refers).

- 1.18 The right of way main footpath linking the area from the duck pond, will run alongside the rear of the retail unit courtyard, making it accessible for an offender to access. As this is a right of way, I realise the footpath will have to remain, but it will mean that security for the rear courtyard will need to be heightened with secure fencing at least 2m high and preferably with defensive security measures, such as roller spikes. In its present form this area could also become a congregating area for antisocial behaviour.



- 1.19 I would appreciate further clarification how the communal entrances to the three and a half storey block and the two three storey blocks will comprise, enabling residents to identify who is at the entrance and how these entrances will be secured? (SBD New Homes 2016 paras 27.5 – 28.8, pages 40- 45 refers).

- 1.20 I would appreciate clarification on how mail will be delivered to the three blocks, will there be a communal area and if so how will the postman make deliveries. If the mail will be disseminated within a communal area, it is preferred external mail boxes are incorporated, so that internal access is not required. The mail boxes should conform to TS009 accreditation. (SBD New Homes 2016, paras 29.1 – 29.4, page 46 refers).

- 1.21 All internal entry doors to individual apartments should be to standards independently certified to the same level as that of front doors. The locking hardware should be operable from both sides of an unlocked door without the use of a key to enable occupants to investigate any emergencies, such as a fire and be able to return to their dwelling to raise the alarm.

- 1.22 I would appreciate further information on the layout for the retail unit, including details of walling, roof design, types of doors and if there will be any security around the front of the retail unit, such as security bollards. Security bollards should be installed to PAS 68-1:2013 standards. (SBD Commercial 2015 para 45.1- 45.3, page 34 refers).
- 1.23 I would like to know the type of glazing and how the glazing will be protected, i.e. the inclusion of security grilles or roller shutters. (SBD Commercial 2015 paras 52.1 – 53.3, page 41 refers).
- 1.24 I would like to know if the retail unit will sell alcohol and the envisaged opening hours.
- 1.25 I would like to know how the rear yard will be secured. It is advisable that the rear perimeter comprises weld mesh steel fencing that will provide clear views over the commercial building. (SBD Commercial 2015, para 42.1 – 44.3 refers).
- 1.26 I would like to know if an ATM will be installed either within the retail unit or on the wall outside and how it will be installed and secured.
- 1.27 It is strongly recommended that the retail unit is designed to Secure By Design (SBD) Commercial 2015 specifications and the developers apply for SBD Commercial approval. Further details on SBD Commercial can be found using the following link: [https://www.securedbydesign.com/wp-content/uploads/2015/05/SBD Commercial 2015 V2.pdf](https://www.securedbydesign.com/wp-content/uploads/2015/05/SBD_Commercial_2015_V2.pdf)
- 1.28 I take it the electricity sub-station will be fenced and secured off.

2.0 REFERRALS

- 2.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.
- 2.12 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.
- 2.13 **One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:**

A safe community: Protect the environment from pollution, flooding and other natural and man-made disasters; **reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.**

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

Landscaping plays 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 Design Out Crime Officer (DOCO)) 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.

2.3 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*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

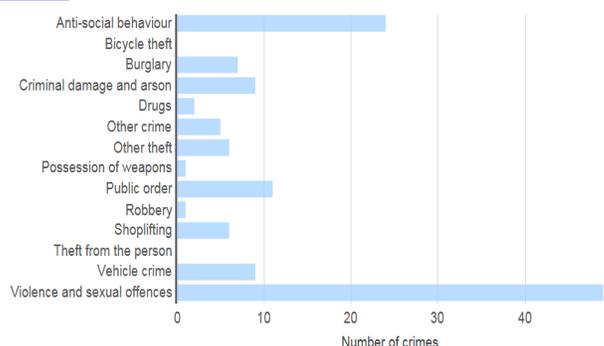
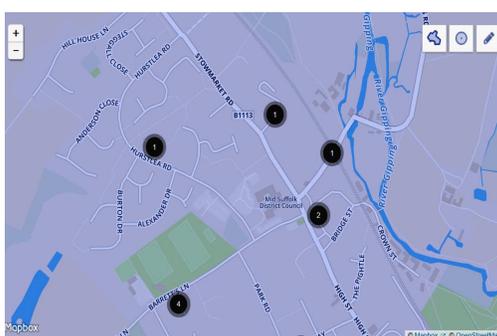
Safer Places highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN 129):

- 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).

3.0 CRIME STATISTICS FOR THE HURSTLEA ROAD, BARRETT LANE AND HIGH STREET AREA, NEEDHAM MARKET SURROUNDING THE IP6 8DL POST CODE

3.1 The crime figures have been obtained from the Suffolk Police Crime computer base And the National Police Crime Mapper web site. The Police Crime Mapper Web site is available for any member of the public to view using the following link:

<https://www.police.uk/suffolk/H41A/crime+OCC75s/stats/>



Crime type ⇅	Total ⇅	Percentage :
Anti-social behaviour	24	18.46%
Bicycle theft	0	0.00%
Burglary	7	5.38%
Criminal damage and arson	9	6.92%
Drugs	2	1.54%
Other crime	5	3.85%
Other theft	6	4.62%
Possession of weapons	1	0.77%
Public order	11	8.46%
Robbery	1	0.77%
Shoplifting	6	4.62%
Theft from the person	0	0.00%
Vehicle crime	9	6.92%
Violence and sexual offences	49	37.69%

3.2 The graph left indicates a breakdown of the offences committed around this area between January 2018 and December 2018, totalling 132 offences, the majority 49 offences involving Violence/ sexual offences, followed by 24 offences relating to Antisocial behaviour.

4.0 CONCLUSION

4.1 I strongly advise the development planners adopt the Approved Document “Q” (ADQ) guidelines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership. Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

4.2 **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/>**

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

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

4.3 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the 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.

4.4 To reiterate, police concerns raised are:

- a) **Six areas that have rear parking integrated (page 2 para 1.2-1.4 refers).**
- b) **Parking areas which have no active surveillance. (page 3, para 1.8 refers).**
- c) **The permeability of the development with at least 13 access points (page 3, para 1.10 refers).**
- d) **If all these access entrance have to remain then restrictions should be placed to slow the flow of personnel to and from the area. (page 3, para 1.11 refers).**

- e) The established footpath by the proposed three storey block by Crowley Park, needs to be well lit and vegetation low, in order to reassure pedestrians to want to travers this area. (page 3, para 1.13 and page 4, para 1.17 refers).
- f) Police prefer back to back gardens plot references 4.01 – 4.09 are not. (page 3, para 1.14 refers).
- g) To obtain clarification on how the communal areas for the three main blocks will comprise? (page 4, para 1.18 refers).
- h) To obtain clarification on how the mail will be delivered for the three blocks? (page 4, para 1.19 refers).
- i) To obtain detail on how the layout of the retail unit will comprise? (page 4, paras 1.21 – 1.25 refers).
- j) To confirm that the electricity sub-station will be secured from the development. (page 5, para 1.28 refers).

If the developers do not intend to adopt Secure By Design standards for the whole development, then I hope they will at least consider such measures for the social housing areas.

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, Raingate Street,
Bury St Edmunds, Suffolk, IP33 2AP

Dear Mark Russell,

Subject: Former Mid Suffolk District Council Offices & Associated Land , 131 High Street, Needham Market, IP6 8DL Ref DC/18/05104

Suffolk County Council, Flood and Water Management have reviewed application ref DC/18/05104.

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

- Flood Risk Assessment & Drainage Strategy Ref 619142-MLM-ZZ-XX-RP-C-0001 rev 5

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

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated January 2019, ref: 619142-MLM-ZZ-XX-RP-C-0001 rev 5) shall be implemented as approved in writing by the local planning authority. The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

2. The 47 dwelling or unit 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.

3. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:
 - a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 - i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses 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 is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act

Kind Regards

Jason Skilton
Flood & Water Engineer
Flood & Water Management
Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX
T: 01473 260411 | <https://www.suffolk.gov.uk/planning-waste-and-environment/flooding-and-drainage/>

Appendix A to the Suffolk Flood Risk Management Strategy has been updated! If you're involved in the planning, design and construction of new developments this may be of interest to you. You will be expected to comply with this new local guidance. More information can be found here; <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/>

From: Iain Farquharson
Sent: 30 November 2018 11:07
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Cc: Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>
Subject: M3. 252371: MSDC Planning Consultation Request - DC/18/05104

Dear Mr Russell

We have reviewed this application and are disappointed at the lack of sustainable elements to the proposal. We do not feel that Core Strategy Objective SO 8 has been sufficiently addressed (New development will be of a high standard of design and layout and will address the need for energy and resource conservation.)

The design and access statement document offers very little and uses vague terminology eluding to items such as thermal improvements. There is also no mention of potable water use limitation and how much better than building regs the development will be. Sustainable material choice is also lacking.

Our recommendation is that either the current D&A is improved or that conditions are included in any permission to ensure the above items are addressed.

Regards

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

01449 724878 / 07860 827027

//iain.farquharson@baberghmidsuffolk.gov.uk

From: Iain Farquharson
Sent: 30 November 2018 11:09
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>; Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>
Subject: FW: M3. 252371: MSDC Planning Consultation Request - DC/18/05104

Please add that the mention of EV infrastructure provision is welcome but more detail is required

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

01449 724878 / 07860 827027

//iain.farquharson@baberghmidsuffolk.gov.uk

Good Afternoon, EP Refs: WK000254716 and WK000252370

**Planning Application DC/18/05104 Former Mid Suffolk District Council Offices & Associated Land 131 High Street Needham Market IP6 8DL :
Redevelopment for Class C3 Residential (94 Units) & Class A1 Retail Uses, incorporating demolition works and the construction of new buildings, with associated works and infrastructure.**

Thank you for the opportunity to comment of the above planning application.

I would recommend the following conditions:

Demolition and Construction

1. Prior to the commencement of any demolition works, the applicant (or their contractors) shall submit a full method statement to, and receive written approval from, the Local Planning Authority.

Reason – To minimise detriment to nearby residential amenity.

2. Noise Control

- 1) The use of barriers to mitigate the impact of noisy operations will be used where possible. This may include the retention of part(s) of the original buildings during the demolition process to act in this capacity.
- 2) No vehicle connected with the demolition or construction works to arrive on site before 07:30 or leave after 19:00(except in the case of emergency). Working hours to be restricted between 08:00 and 18:00 Monday to Friday, 08:00-13:00 Saturday with no working of any kind permitted on Sundays or any Public/Bank Holidays.
- 3) The selection and use of machinery to operate on site, and working practices to be adopted will, as a minimum requirement, be compliant with the standards laid out in the current version of BS 5228
- 4) Mobile plant to be resident on site during all works shall be fitted with non-audible reversing alarms (subject to HSE agreement).
- 5) Prior to the commencement of any piling works which may be necessary, a full method statement shall be agreed in writing with the Planning Authority. This will contain a rationale for the piling method chosen and details of the techniques to be employed which minimise noise and vibration to nearby residents.

Reason – To minimise detriment to nearby residential amenity.

3. Emissions

- 1) No materials produced as a result of the site development or clearance shall be burned on site.
- 2) All reasonable steps, including damping down site roads, shall be taken to minimise dust and litter emissions from the site whilst works of construction and demolition are in progress.
- 3) All bulk carrying vehicles accessing the site at all times shall be suitably sheeted to prevent nuisance from dust in transit.

Reason – To minimise detriment to nearby residential amenity.

4. The residential accommodation shall be constructed so as to provide sound insulation against external road traffic noise to achieve internal noise levels not exceeding 30 dB LAeq (night) and 45 dB LAmax (measured with F time weighting) for bedrooms, and 35 dB LAeq (day) for other habitable rooms, with windows shut and other means of ventilation provided. Construction of the residential premises shall not commence until such a scheme demonstrating the achievement of these standards has been submitted to the Local Planning Authority and approved in writing.

Reason - To protect the future occupiers of noise sensitive dwellings from adverse impacts of road traffic noise.

5. The hours of use for A1 use units to be as in the planning application form i.e. 07.00 to 22.30 Monday to Saturday and 10.00-6.00 Sunday. All collections and deliveries shall be limited to 06.00- 18.00 Monday to Saturday and 0900-16.00 Sundays and Bank Holidays.

Reason – To minimise detriment to nearby residential amenity

6. No fixed plant and/or machinery shall come into operation until details of the fixed plant and machinery serving the development hereby permitted, and any mitigation measures to achieve this condition, are submitted to and approved in writing by the local planning authority. The rating level of the sound emitted from the site shall not exceed 35 dBA at any time. The sound levels shall be determined by measurement or calculation at the nearest noise sensitive premises. The measurements and assessment shall be made according to BS 4142:2014. The approved levels shall be adhered to thereafter.

Reason – To protect the existing and future occupiers of noise sensitive dwellings from adverse impacts of fixed plant noise.

7. A scheme of sound insulation between the convenience goods retail unit and the proposed residential properties above to ensure that maximum noise levels from activity at the convenience goods retail store do not exceed 35 dB LAmax shall be submitted to the local planning authority and approved in writing. The recommendations within the sound insulation report shall be implemented in full prior to the first occupation of those residential units.

Reason – To protect the future occupiers of noise sensitive dwellings from adverse impacts of fixed plant noise.

8. All lighting on site shall be as specified and installed in accordance with the lighting design submitted within the planning application and thereafter be retained and maintained to the agreed specification and working order.

Reason – To minimise detriment to nearby residential amenity.

Regards

Andy

Andy Rutson-Edwards, MCIEH AMIOA
Senior Environmental Protection Officer

Babergh and Mid Suffolk District Council - Working Together

Tel:

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