



Offton & Willisham Parish Council

www.offtonandwillisham.org.uk



Miss Teresa Davis
Parish Clerk
Offton & Willisham Parish Council
30 Broadfields Road
Gislingham
EYE
IP23 8HX
TEL: 07719208444
Email: clerk@offtonandwillisham.org.uk

Mr Philip Isbell
Acting Chief Planning Officer
Growth & Sustainable Planning
BMSDC
Endeavour House
8 Russell Road
IPSWICH
IP1 2BX

8th January 2018

Dear Philip Isbell

RE: Application for Outline Planning Permission – DC/18/05313

I write on behalf of the Offton & Willisham Parish Council and it's residents to provide you with an up-to-date overview of the parish and to also set out below the objections to this Application for Outline Planning Permission.

We have attached a Summary, which outlines the main objections raised by the residents of Offton in a public meeting on 20th December 2018.

Following the Parish Council meeting on 3rd January, below are the objections of the Council:-

History of the Site

This site has been rejected in 1989, under planning reference OL/16/89 and also at the 'call for sites' in 2017. The site is outside of the former settlement boundary and is classified as open countryside. Offton is due to be designated as a hamlet, as the area is incapable of withstanding development.

The Parish previously undertook a Parish Plan in 2008 (published in 2009), which has seen the building of it's own Village Hall to fulfil the community's amenities for the village. There are no outstanding needs for a 'reading room' or 'play area'. The Village Hall (with playground) is a community led enterprise which is a long term plan to meet the needs of it's residents.

Current Background of Site & Parish

We can confirm from direct experience of our residents that the nearest school is at full capacity, as is the local Doctors Surgery. There are no public transport links for those who regularly work, with no opportunity to commute on the bus linking to rail networks. Even shopping and leisure pursuits are severely restricted. There are no shops, no schools, no doctors surgeries in Offton.

Bringing attention now to the roads, both council and residents are in agreement when focus is drawn to the roads in and out of the Parish. Residents already find the roads impassable for two vehicles, and distinct worry has been seen regarding the sheer volume of traffic this development would bring in an already overloaded local road network, not to mention the damage to verges during a development. The roads are simply not adequate. Indeed, the 'emergency' access in Castle Lane is a single track road.

The proposed development site has been walked by both councillor, resident and County Councillor who have confirmed inconsistencies with the developer's calculations, for example the bridge calculations differ by 2metres.

Individual residents will experience traumatic changes to their homes and lives. Their privacy will go, the level of noise will increase, a distinct loss of access to views will be seen, and the increase of light during the night could cause serious long term health problems for our residents opposite the proposed site.

We have thriving wildlife in and around the Parish with a large following of residents. Not only are there a varied amount of birds, such as Barn Owls, Little Owls etc, there are Otter, Deer, Water voles and Bats, both of which are extremely sensitive to the area in which they live. They are a testament to the peace and serenity that Offton provide. This peace and serenity will be taken away by a development of this kind in this particular site.

The Parish Council have an Affordable Housing Working Party which met with the developer in relation to affordable housing for the residents of the Parish. At no time did the working party agree to any of the developers assumptions they have made about the Parish Council's view. The Parish Council have taken a very dim view of this treatment by the Developer and the use of an old and now out-of-date Parish Plan, and wish to clearly state this feeling to you. The development is in direct conflict with the Parish's current needs.

Further problems with the Site

- **Size:** The proposed number of dwellings is too large, a 25% increase for the Parish is unsustainable bordering on catastrophic.

- **Long term Design:** The Sewerage existing in the village is at full capacity already. Residents and Council are concerned about adequate sewerage, lack of adequate access and contamination. The development does not set out to protect the proposed section of the site not outlined for housing and therefore this land could also be developed.

- **No Community Benefit:** There are no community benefits provided which are needed by Offton, The Village Hall has a car park, play park, with grounds and plans for further extension of amenity for the Parish. The allotments are no longer full.

- **Existing Public Footpaths on Open Countryside:** The site has public footpaths, used to access and survey the beautiful open countryside and is enjoyed by residents and further public. This would be destroyed.

- **Wildlife Threatened:** The 'Channel' (term for the small river which will go under the proposed bridge) and the truly green environment that it brings to our thriving and settled wildlife would be decimated.

- **Inadequate Highways:** No adequate road access exists for this site, especially for heavy vehicles. The Village experiences severe 'pinch points', the development would make it more dangerous and provide an increase in carbon emissions directly into the village.

- **Visual Impact:** The development will hugely impact on the existing 'Dark Spot' of the area, and effect a loss of light during the day for those residents nearby.

- **The development is economically unsustainable** (as already mentioned): The development brings no economic benefit and the village has no jobs, schools, regular public transport, shops or medical buildings, with poor & narrow rural local roads giving an overall zero supportive infrastructure for development.

- **Flooding will only increase:** The proposed site is in a flood zone, it already floods and is waterlogged during the winter. The River regularly bursts it's banks. The Village already gets cut off with impassable water on the road, this is set to worsen over time.

- **Green site of open countryside:** The development would cause long term damage, loss to more than just the residents, it would be loss of wildlife which has taken time to develop, the loss of local views, used by many as an aid to leisure and sightseeing, the loss of quality of life, the degeneration of air quality. Because of the small nature of the parish the proposed development would have an even greater impact and long term cumulative effect to degenerate the environment once thriving for both resident/public and wildlife alike.

Summary of Objections

- There is a prior history of refusal on this 'Green' site
- There is no Economic Infrastructure to support the development
- It is in direct conflict with both the Parish Council's and MSDC's future planning
- It negatively impacts on Public Rights of Way and on Public Rights to enjoy Open Countryside
- It ignores the problems of sewerage and flooding and contamination of the village
- It negatively impacts on the Environment & decimates the habitats of existing Wildlife
- It provides no economic or community benefit for the Parish or wider community
- It incorrectly states the Parish Council's support and supposed benefits

Thank you for inviting us to consult on this outline planning application. The Parish and it's residents clearly Object and I hope I have been able to breakdown the complexity of the objections and show the fragile balance the Parish current exists within.

It is our aim to provide you with sufficient 'on the ground' local information, to aid you in your decision making. Should you require further information please do not hesitate to contact me.

Thank you for your time.

Yours sincerely

Teresa Davis

Clerk to Offton & Willisham Parish Council

From: Rod Caird <somersham.pc@outlook.com>

Sent: 03 January 2019 11:12

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: Re: MSDC Planning Consultation Request - DC/18/05313

This application was discussed at a meeting of Somersham Parish Council on January 2, 2019.

Noting that the proposed development is in the neighbouring parish of Offton, Somersham councillors nevertheless felt that a consequence, if it goes ahead, would be increased traffic volumes in Somersham, which already has difficulty in dealing with existing traffic flows. Road design in the village includes hazardous pinch points and increased traffic levels will add to existing problems. In addition, it was felt that construction traffic, during the build phase of the development, will need to be directed to use main roads rather than further congesting single track and minor routes.

Rod Caird
Clerk, Somersham Parish Council
26 Church Lane,
Henley IP6 0RQ
somersham.pc@outlook.com

Please read our privacy notice [here](#). It contains important information about how the Parish Council looks after the personal data of everyone we deal with.



Historic England

EAST OF ENGLAND OFFICE

Mr Mark Russell
Babergh and Mid Suffolk Councils
Endeavour House
8 Russell Road
IPSWICH
Suffolk
IP1 2BX

Direct Dial: 01223 582710

Our ref: **W:** P01009231

17 December 2018

Dear Mr Russell

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

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH,
SUFFOLK, IP8 4RR
Application No. DC/18/05313**

Thank you for your letter of 5 December 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

Will Fletcher

Inspector of Ancient Monuments

E-mail: will.fletcher@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Your ref: DC/18/05313
Our ref: Offton – land on the south side of
Bildeston Road 00057307
Date: 06 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,

Offton: land on the south side of Bildeston Road – developer contributions

I refer to the proposal: outline planning application (access and layout to be considered) – erection of 32No.dwellings comprising 9 local need homes, 2 affordable homes, 21 open market homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

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 32 dwellings, namely:

- a) Primary school age range, 5-11: 8 pupils. Cost per place is £12,181 (2018/19 costs).
- b) Secondary school age range, 11-16: 6 pupils. Cost per place is £18,355 (2018/19 costs).
- c) Secondary school age range, 16+: 2 pupils. Costs per place is £19,907 (2018/19 costs).

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

As there is no safe walking route from the proposed development to Somersham Primary School a developer contribution is required for school transport purposes, which will need to be secured by way of a planning obligation. The estimated cost of providing each pupil with transport is £950 per annum. Therefore, £950 x 8 pupils x 7 years = £53,200.

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 £97,448 (2018/19 costs) will be made and at the secondary school level a future CIL funding bid of at least £149,944 (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 5 pre-school children arising, at a cost of £8,333 per place

This proposed development is in the ward of Barking and Somersham, where there is an existing deficit of places. Therefore, a future CIL funding bid of £41,665 (2018/19 costs) will be made for the 5 children arising.

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.

Paragraph 102 of the NPPF says Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Paragraph 104 says that planning policies should provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).

Paragraph 110 says applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Paragraph 111 says that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

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. £6,912, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

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.

Apart from the school transport contribution to be secured by way of a planning obligation, 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/2018/123593/01-L01
Your ref: DC/18/05313
Date: 02 January 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.
CREATION OF NEW ACCESSES TO BILDESTON ROAD AND CASTLE ROAD, 9
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH, SUFFOLK,
IP8 4RR**

Thank you for your consultation received on 5 December 2018. We have inspected the application as submitted and are raising holding objections on flood risk, ecology and foul drainage grounds.

Flood Risk

Our maps show the application site lies within fluvial Flood Zone 3b (defined as the functional flood plain), 3a,2 &1, the high, medium & low probability zone. The proposal is for 32 dwellings, a public reading room, creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park, which is classified as a 'more' vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance](#). Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site specific Flood Risk Assessment (FRA).

We have not seen evidence that you have applied the Sequential and Exception Tests. This is your responsibility and we recommend you consider them before the applicants review their FRA. We would also like to highlight that we would object should plans change to allow any development in the functional floodplain (3b).

The flood risk assessment (FRA) submitted with this application does not comply with the requirements set out in paragraph 160 of the National Planning Policy Framework (NPPF). This states that for areas at risk of flooding, a site-specific flood risk

assessment must be undertaken that demonstrates that the development will be safe for its lifetime. The FRA also does not comply with paragraph 149 of the NPPF, which requires local planning authorities to adopt proactive strategies to adapt to climate change, taking full account of flood risk and coastal change.

We have reviewed the flood risk assessment, referenced Country House Homes Ltd and dated Nov 18, and are not satisfied that it provides you with the information necessary to make an informed decision.

In particular,

- Different climate change allowances have been used to assess future flood risk than those advised in '[Flood risk assessments: climate change allowances](#)', without adequate justification. In this instance, according to our guidance, the allowances that should be assessed are the Higher Central of 35% and the Upper End of 65%.
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for Higher Central of 35% and the Upper End of 65%. Consequently the development proposes inadequate:
 - Flood storage compensation
 - Safe access and egress routes

Siting of Dwellings

Appendix 4.0 of the FRA– Proposed Residential Development Layout, shows all proposed development lies within Flood Zone 1. However the most up to date climate change analysis has not been used, therefore the extents of the flood plain have not accurately been determined.

Bridge across the main river – Access/Egress

When considering the bridge which crosses the main river, the applicant must consider both the 35% and 65% allowances, and if possible design the structure to be safe in the 65% climate change allowance.

- Flood Storage Compensation is required for any loss of floodplain storage due to the construction of the bridge. We note that compensatory storage has been proposed but this must consider the updated climate change allowances.
- It must be determined whether the access/egress is in flood zone 1 following updated climate change flood extents.
- A Flood Evacuation Plan should be prepared.

Further advice relating to the bridge crossing across the main river can be found within the ecology section below.

Compensatory Storage

Built development within the floodplain should be compensated for on a volume-for-volume and level-for-level basis, and this process requires an available area of land on the edge of the floodplain to be viable, which is achievable in this location.

Flood Levels

It is noted that the FRA adds 30% to the 1% (1 in 100) year flood level. This is incorrect. For fluvial flood flows the applicant must consider both the 35% and 65% allowances – see climate change section below

Flood Risk Climate Change Guidance for the Applicant

Climate Change - Detailed Allowance

Climate change allowances have changed recently. The Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](#). Our guidance '[Flood risk assessments: climate change allowances](#)' provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk.

For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more appropriate to choose a flood level higher in the range.

The proposed development is classified as a “More Vulnerable Large-Major” development, and lies within Flood Zone 2/3a. This means the applicant must adopt a “detailed” assessment. A detailed assessment requires the applicant to perform detailed hydraulic modelling, through either re-running Environment Agency hydraulic models (if available) or construction of a new model by the developer. Assuming the lifetime of the development is until 2118, the allowances the applicant must apply are Higher Central (35%) and Upper End (65%).

We do currently have model coverage for this area. If you wish to extract flows/ re-run this model, the model you will require is Gipping 2012. This can be requested from our Customers and Engagement Team on Enquiries_EastAnglia@environment-agency.gov.uk.

We recommend that you assess both the 35% and 65% allowances, and if possible design the development to be safe through sequentially siting the dwellings in FZ1 or raised floor levels in the 65% climate change allowance. If this is not possible then robust justification should be provided, and the development should be designed to be safe through raised floor levels in the 35% allowance and the safety and sustainability of the development should be assessed for the 65% and managed through flood resilient/resistant construction measures to the satisfaction of the LPA.

Overcoming our Objection

The applicant can overcome our holding objection by submitting an FRA that covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved,

we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. More detailed advice on overcoming our objection is provided in an appendix to this letter.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Environmental Permit

The applicant will need a bespoke environmental permit for flood risk activities for the access bridge over the main River Somersham watercourse, locally known as 'The Channel' and should not wait for planning permission to be granted before applying, as the proposals must be achievable under the Environmental Permitting. An enquiry and/or application should be made to FDCENS@environment-agency.gov.uk as soon as possible.

Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Further flood risk advice can be found in the technical appendix at the end of this letter.

Ecology

Otters

We are raising a holding objection to this application due to the impacts that the proposed culverted entrance to the development across the watercourse could have on otters. Otters are fully protected under the 1981 Wildlife and Countryside Act. This planning application needs to take the species into account which it has failed to do. We have reviewed the Preliminary Ecology Appraisal dated July 2018 which states that otters are unlikely to use this watercourse.

We however have lots of evidence that otters use even small watercourses such as this to explore, forage for food and travel widely. The good roads guide ([Standards for Highways: Design Manual for Roads and Bridges](#)) states that clear span bridges are required where otters are an issue and we strongly support this view having collected otter casualties for many years. Cheaper culvert and bridge options very often cause otter deaths during high flows after heavy rain as otters are forced out of the channel and have to go round poorly designed crossings and on to roads where they become traffic casualties. For further information on how to overcome our objection, please see the overcoming our ecology objections section below.

River Channel Geomorphology

The proposed culverted entrance to the development to simply widen the channel base in places in order to increase capacity is inadequately designed. A wide channel base such as the proposed cross sections will simply silt up during periods of low flow and so (high in this catchment this would be most of the time). There is then no guarantee that the extra capacity would be available for water during flood flows when needed if it is already filled with silt and/or other debris. A carefully designed two stage channel with a cross section which takes account of both high and low flows will be much more sustainable here.

Overcoming our ecology objections

The applicant should use a clear span bridge to reduce the potential for otter fatalities as well as reducing the risk of siltation. A clear span bridge also brings other benefits such as reducing flood risk problems by increasing channel capacity. We ask to be re-consulted upon submission of any new designs.

Preliminary Ecological Appraisal

With regards to the other biodiversity issues raised in the Preliminary Ecological Appraisal (submitted by The Landscape Partnership) we would like to highlight that all the biodiversity mitigation proposed in section 6.2 (habitat enhancement measures) and 6.3 (small scale enhancements) should be carried out if this application is granted now or in the future to ensure that there will not be a net loss of biodiversity in accordance with NPPF paragraph 170.

Foul Drainage

The application states that foul water will be discharged through a package treatment plant. Further information submitted by the applicant on 7 December 2018 stated that there did not appear to be mains foul drainage and that the area relied on treatment plants within Castle Lane.

Our records show that there is a sewer network near the site and two water recycling centres (WRCs) are operated by Anglian water. We are raising a holding objection on these grounds as it is unclear if the development will be connected to the mains or through a private package treatment plant.

It is important to connect to the mains where possible. The assumption is that foul water should enter the existing sewerage network. Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems. Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered. Justification should be provided if this is the case.

If the applicant confirms that they will connect to the mains, the sewerage undertaker should be consulted and the developer should contact Anglian water about treating the foul water at their existing works. We do not have much information on the Anglian Water WRCs as they are small and we don't have any figures on capacity.

Overcoming our objection

To overcome our objection the applicant should confirm if foul drainage will indeed go through the Anglian Water operated mains foul drainage system. The applicant should thoroughly investigate the possibility of connecting to the public foul sewer and provide justification if this is not possible.

Lack of capacity or plans to improve capacity in the sewer is not a valid reason for a development to install a private sewerage system. In such cases the developer should explore how a lack of capacity may be overcome so that their development can be

connected to a public foul sewer. If the applicant needs to discharge foul water through a package treatment plant a permit may be required and general binding rules must be followed. Further information can be found here <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water#rules-for-existing-and-new-treatment-systems>.

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 Country House Development Ltd

Technical Appendix

Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.



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

Our ref: AE/2018/123593/03-L01
Your ref: DC/18/05313
Date: 14 March 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.
CREATION OF NEW ACCESSES TO BILDESTON ROAD AND CASTLE ROAD, 9
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH, SUFFOLK,
IP8 4RR**

Thank you for your re-consultation dated 25 February following the submission of further details on the 25 February 2019. We have reviewed the application as submitted are removing aspects of our flood risk holding objection and maintaining others. Please see the relevant sections below for further information. We are also maintaining our Ecology and Foul Drainage holding objections – further details are provided below.

Flood Risk

We refer to the Flood Risk Assessment (FRA), prepared by CTP Consulting Engineers, referenced A5689 and dated 30 January 2019 as well as the additional information submitted to us on 25 February 2019 which has now been submitted in support of this application. We have reviewed the documentation and are maintaining our holding objection on flood risk overall as the submitted documentation not adequately address all of the issues raised previously. We are however removing the climate change aspect of our holding objection. Further information can be found below.

Bridge and River channel alterations

We are maintaining this aspect of our flood risk holding objection. In terms of the installation of a culvert and alterations to the river channel itself, we still have concerns

Environment Agency
Iceni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

regarding the proposals. We are generally opposed to the installation of culverts. Before any works to the river can occur, a permit is required from us for the works (which is required in addition to any planning permission which may be granted). When we receive an application for a permit, we will only approve a culvert if there is no reasonably practicable alternative, or if we think the detrimental effects would be so minor that a more costly alternative would not be justified. Full consideration should be given to application for a clear-span bridge structure. This will be less damaging to the river itself and should result in less, or possibly no compensatory storage requirements.

Overcoming our objection

Modelling will need to be provided to demonstrate that the crossing structure will not increase flood risk, for a range of return periods (including climate change) and to ensure that any compensatory storage is adequate and also does not result in increased flood risk.

Full consideration should be given to a clear span bridge structure. This will be less damaging to the river itself and should result in less, or possibly no compensatory storage requirements.

We ask to be re-consulted following the submission of any further information and we will provide comments within 21 days.

Climate change

We are removing the climate change aspect of our flood risk holding objection following the submission of further information on 25 February 2019. We note that climate change has been calculated by adding 400mm to the flood level, as agreed with us and it is demonstrated through comparison of this new level with the topographical survey for the site that all buildings will be above this flood level. We therefore have no further objection to the location of the proposed houses and confirm that they will all be located within flood zone.

Environmental Permit for Flood Risk Activities

As confirmed in our previous response referenced AE/2018/123593/01 and dated 2 January 2019, the applicant will need a bespoke environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. The Somersham Watercourse, is designated a 'main river'.

Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Ecology

River Channel Morphology

We are maintaining this aspect of our Ecology holding objection. The widened bays for extra storage within the channel are not likely to work in practice as they are much wider than the existing natural width of the bottom of the channel and at the same level. As currently designed this watercourse will be ecologically damaged by being over

deepened and over widened. This will cause the widened bays to become filled with silt and material which take up any proposed storage. To be effective the bays would need to be redesigned to slope in a shallow 'v' cross section closer to the original natural one. The flood water will then drain down naturally back to the bottom without excessive siltation occurring.

This is also true of the bridge itself which being wider than the natural channel could become silted up and a management problem. We would be happy to provide specific advice on this. This would fall under our optional planning advice service. If the applicant would like to make use of this service, they should contact us on planning.ipswich@environment-agency.gov.uk for which we will be able to provide a quote. Alternatively, we suggest that the developer consults an experienced river geomorphologist.

The interference with the channel will impact negatively on the watercourse habitat creating silty over-widened and over-deepened sections and therefore will also not function to store water in a sustainable manner.

Otters

We are pleased to see the positive revisions made to the bridge design including an otter pass. We are however currently maintaining our holding as the current drawing shows the otter pass well off the ground and not easily accessible during high flows. The otter pass will need to be easily accessible for passage. Precise details will need to be agreed before construction. As stated in the Flood Risk section of our report, the optimal solution would be a clear span bridge. This watercourse is quite a flashy catchment and water levels can rise very quickly.

Overcoming our objection

The applicant should provide details of the widened bays referenced above revised to take natural river morphology into account. In terms of the otter part of our objection, we require revised drawings to take into account the deficiencies highlighted above.

Foul Drainage

We are maintaining our foul drainage holding objection raised in our letter referenced AE/2018/123593/01 and dated 2 January 2019. We have no records of Anglian Water WRC discharging poor quality effluent.

Overcoming our objection

The applicant must try every means to connect to mains foul drainage in the area. Not connecting to the existing foul sewer must be justified by the applicant after consultation with Anglian Water. Please refer to the guidance attached guidance titled "How we decide whether a site should connect to public sewer". We expect sewerage undertakers to make timely provision to accommodate additional flows from new development within the public sewerage network. Please see page 24 of the attached guidance note for further information.

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 Country House Development Ltd

End

4

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

Our ref: AE/2018/123593/05-L01
Your ref: DC/18/05313
Date: 15 April 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.
CREATION OF NEW ACCESSES TO BILDESTON ROAD AND CASTLE ROAD, 9
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD, OFFTON, IPSWICH, SUFFOLK,
IP8 4RR**

Thank you for your re-consultation dated 26 March 2019 following the submission of revised plans showing an open span bridge. We are therefore removing our Flood Risk and Ecology holding objections provided that below condition is included should the permission be granted. Further information on Flood Risk and Ecology can also be found below. We are maintaining our Foul Drainage holding objection until we receive further information. It is our understanding that the applicant is currently in talks with Anglian Water and we request that we are re-consulted when this is complete or further information is available.

Condition

The bridge shall be built in accordance with the submitted drawing referenced 500/OP0112/C dated March 2019 showing an open span bridge.

Reason for condition

To ensure flood risk is not increased on or off site and that the watercourse will not be ecologically damaged.

Flood Risk

Thank you for submitting further details in relation to the crossing at the above

site. Drawing 500/OP/012/C, dated March 2019, confirms that a clear span bridge shall be provided in place of the originally proposed culvert.

The bridge will be capable of passing flows during the 1% (1 in 100 year) annual probability flood inclusive of climate change, with a 600mm freeboard to soffit level as minimum. The structures span the watercourse from bank to bank, with no supports entering the river channel itself.

We therefore confirm that we remove our objection on flood risk grounds, and have no further comments to make.

It should be noted that irrespective of any planning permission granted, a bespoke permit will be required from us for the construction of the bridge. The permit will cover the bridge details the method of installation and the future maintenance of the structure. For further details, please refer to the following advice:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits#bespoke-permits>

Ecology

This new proposal for a clear span bridge (and removal of proposed culvert and other channel works). This revised proposal overcomes our previous biodiversity and morphology objections.

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



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

Our ref: AE/2018/123593/06-L01
Your ref: DC/18/05313
Date: 24 April 2019

Dear Mr Russell

**OUTLINE PLANNING APPLICATION (ACCESS AND LAYOUT TO BE CONSIDERED)
ERECTION OF 32NO. DWELLINGS COMPRISING 9 LOCAL NEED HOMES, 2
AFFORDABLE HOMES, 21 OPEN MARKET HOMES AND PUBLIC READING ROOM.
CREATION OF NEW ACCESSSES TO BILDESTON ROAD AND CASTLE ROAD, 9
PARISH ALLOTMENTS AND A COMMUNITY CAR PARK.**

**LAND ON THE SOUTH SIDE OF BILDESTON ROAD OFFTON IPSWICH SUFFOLK
IP8 4RR**

Following the submission of further information to us on 23 April 2019 we are removing our Foul Drainage holding objection raised in our letter referenced AE/2018/123593/01 and dated 2 January 2019 providing the condition below on foul drainage is included should the permission be granted. We therefore have no objections to this application provided this condition on foul drainage and the condition on bridge construction raised in our letter referenced AE/2018/123593/05 and dated 15 April 2019 is included should the permission be granted.

Foul Drainage

Anglian Waters pre-planning assessment report referenced 145822/904124355/1/0055597 and dated 23 April 2019 has been submitted to us in support of this application. The report confirms Anglian Waters acceptance to receiving foul water from this site through their existing Offton-Middlewood Cottages Water Recycling Centre.

Condition

The development shall connect to the Anglian Water mains sewerage network as indicated in Anglian Waters pre-planning assessment report referenced

Environment Agency
Iceni House Cobham Road, Ipswich, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

145822/904124355/1/0055597 and dated 23 April 2019.

Reason

Planning practice guidance on non-mains drainage states that the first presumption must be to provide a system of foul drainage discharging into a public sewer (ref ID 34-020-20140306).

Paragraph 170 of the National Planning Policy Framework 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, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

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 Country House Development Ltd

Consultation Response Pro forma

1	Application Number	DC/05313	
2	Date of Response	24/12/2018	
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>  <p>OLYMPUS - 8x4MS Wide - Euro 6 - Smo</p> <p>Wheeled bin presentation points are required to be plotted on a map for approval.</p> <p>Please provide the safe working load (SWL) for the access over the bridge on the primary access from the north (Bildeston Road).</p> <p>Suggest signage for the emergency route only no HGV access.</p>	
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		

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.

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.

From: Highways PROW Planning <PROWplanning@suffolkhighways.org>
Sent: 13 December 2018 16:28
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/18/05313

For The Attention of: Mark Russell

Public Rights of Way Response

Thank you for your consultation concerning the above application.

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

Public Footpath 26 is recorded through the proposed development area.

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

Informative Notes

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

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

To apply for structures, such as gates, on a Public Rights of Way, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.

3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

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

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

More information about Public Rights of Way can be found at www.suffolkpublicrightsofway.org.uk

Jennifer Green

Rights of Way and Access

Growth, Highways and Infrastructure, Suffolk County Council
Suffolk Highways, Phoenix House, Goddard Road, Ipswich, IP1 5NP

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
[@PlaceServices](https://twitter.com/PlaceServices)



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

25/03/2019

For the attention of: Mark Russell

Ref: DC/18/05313 – Land on the South Side of, Bildeston Road, Offton, Ipswich, IP8 4RR

Thank you for consulting us on the outline planning application (access and layout to be considered) for the erection of 32No. dwellings comprising of 9 local need homes, 2 affordable homes, 21 open market homes and public reading room. As well as the creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park. This letter sets out our consultation response on the landscape and visual impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site.

Review of submitted information

The site is an arable landscape covering a total area of 3.8 hectares and bounded native hedgerows. It has a water course known as The Channel on the northern edge and abuts existing residential gardens of Castle Way and PROW SK3429 along its east boundary. Generally there are native hedgerows to all boundaries although these hedges are patchy in sections having been impacted by farming activity.

The site lies within a Special Landscape Area (SLA). Saved Policy CL2 of the Mid Suffolk District Local Plan (2007) states that development proposals in Special Landscape Areas will only be permitted where they maintain or enhance the special landscape qualities of the area and ensure they are designed and sited so as to harmonise with the landscape setting. As the Design and Access Statement (DAS) suggests, the proposed landscape scheme equates to 60% of the site. However, the majority of this is managed and 'man-made' landscape features, which will still have an impact on the landscape value and natural quality that will not be reflecting the character of the area or its special landscape setting.

The DAS concludes that "*when assessed in context with the proposed development scheme and community assets one can determine that the proposed development, by virtue of its design, layout, siting and scale will have a minimal impact on the wider landscape in the south, north and easterly directions.*" However, after a desktop study and a site visit we are of the opinion that this is not the case and that there are key receptors and viewpoints that will inevitably be adversely impacted by this proposed development and would deem it unacceptable in this location.

Likely impact on the surrounding landscape

As stated above, the proposal will inevitably have an adverse impact on the existing rural character of Offton and the surrounding countryside. Offton is classed as a countryside village and the application site lies west of the settlement boundary. The countryside that surrounds Mid Suffolk settlements is attractive and is protected. Policy CS2 of the Mid Suffolk Core Strategy Development Plan document (Adopted Sep 2008) states that 'In the countryside development will be restricted to defined categories in accordance with other core strategy policies such as agriculture and forestry, the preservation of Listed Buildings and rural exception housing' and 'exceptions might be for affordable housing where a local need is identified or small scale employment that can be operationally justified



and where these developments cannot be met in a more sustainable location.' However, the density, character and layout proposed is not suitable for this countryside location and wouldn't be supported due to the impact on landscape character and setting.

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Rolling Valley Farmlands landscape character type (LCT). This is a rich and varied landscape with a concentration of towns and villages. Key characteristics of this LCT include: substantial and long-established hedges of hawthorn, blackthorn and dogwood, greens or commons, gently sloping valleys and contained landscapes. It is important that landscape characteristics such as these are retained and/or enhanced to ensure the countryside village character is not lost. However, due to the density, proposed highway access points and physical location this has not been accomplished.

For the reasons stated above, we would recommend this application is **refused**.

If you have any queries regarding the above matters, please let me know.

Kind regards,

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

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

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

Sent: 12 December 2018 14:08

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

Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: DC/18/05313 Land on the South Side of Bildeston Road, Offton

Hi Mark,

The Heritage Team will not need to comment on this application.

The 'Amended Heritage Statement' includes additional information on proposed archaeological investigations on the site, so the SCC Archaeological Officer may need to be re-consulted instead.

Thanks,
Karolien

Karolien Yperman BA(Hons) MA

Heritage and Design Officer

Babergh and Mid Suffolk District Councils – Working Together

T: 01449 724820

T: 07850 883258

E: karolien.yperman@babberghmidsuffolk.gov.uk

E: heritage@babberghmidsuffolk.gov.uk

www.babergh.gov.uk & www.midsuffolk.gov.uk

From: Iain Farquharson <iain.farquharson@babberghmidsuffolk.gov.uk>
Sent: 24 December 2018 13:36
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Cc: Mark Russell <Mark.Russell@babberghmidsuffolk.gov.uk>
Subject: 252637: MSDC Planning Consultation Request - DC/18/05313

Dear Mr Russell

We have reviewed this application and are pleased to see a high degree of community spaces and some mention of the sustainability of the dwellings themselves, although this could be bolstered.

There is description of sustainability items in sections 18, 19 and 20 of the design and access statement which is welcome.

We would like to see commitments to a reduction in CO2 and or energy, use of sustainable materials and construction techniques (referencing the BRE Green Guide) and commitment to make every dwelling ready for the low cost simple installation of electric vehicle charging points as per NPPF and Suffolk County guidance.

The complete dismissal of renewable technology as 'the locality would be inappropriate' is not a genuine technical or regulatory reasons for its exclusion and should be incorporated into the scheme.

We would be supportive of this application as long as these items are agreed upon as a condition to any permission.

Regards

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

01449 724878 / 07860 827027
//iain.farquharson@babberghmidsuffolk.gov.uk

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

29th May 2019

Dear Mark,

RE: DC/18/05313 Outline Planning Application - Erection of 32No. dwellings (9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes) and public reading room. Creation of new accesses, 9 parish allotments and a community car park. Land on The South Side of Bildeston Road, Offton, Ipswich, IP8 4RR

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

We have read the Interim Ecological Impact Assessment (The Landscape Partnership, January 2019) and we are broadly satisfied with the findings of the consultant. We note that the dormouse nest tube survey commenced in April 2019 (letter from Landscape Partnership dated 20th May 2019) but will not be complete until September 2019 at the earliest. If any permission were to be granted, it would need to be a condition of planning consent that no works are to commence prior to the completion of the dormouse survey, and any subsequent mitigation strategy required has been submitted.

We note that a proportionally large area in the west of the site has been designated as Public open Space and Community Grazing Land. We query how this land will be protected against future development? We also request that a suitable Landscape and Ecological Management Plan is submitted as a condition of planning consent to ensure best maintenance of the land for biodiversity.

The site also appears to lie within the area covered by the emerging Recreation Disturbance Avoidance Mitigation Strategy (RAMS), further consideration must therefore be given to the need for Habitat Regulations Assessment (HRA) of the proposed development under the Conservation of Habitats and Species Regulations 2017 and the requirement for the proposed development to contribute to this strategy.

Notwithstanding the above, we request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jill Crighton
Conservation Planner

MID SUFFOLK DISTRICT COUNCIL

To: Mark Russell - Planning Officer
From: Louise Barker – Housing Enabling Officer – Strategic Housing
Date: 2nd January 2019

SUBJECT: - DC/18/05313 | Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

Location: Land on The South Side of Bildeston Road Offton Ipswich Suffolk IP8 4RR

Key Points

1. Background Information

This is an outline application for 32 dwellings.
This development is delivered would trigger an affordable housing contribution under Mid Suffolk local policy of 35% = 11 affordable dwellings.

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. 730 applicants registered for affordable housing in Mid Suffolk at January 2019. This site if it were to be delivered with a s106 planning obligation in line with current local requirements the affordable housing provided will be to meet district wide need hence the **730** applicants registered is the important number.

3. Open Market homes.

3.1 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and want to remain in their local communities.

3.2 There is a strong need for homes more suited to the over 55 age bracket within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality.

3.3 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.
- Although this is not their first preference, many accept that the private rented sector is their most realistic option.

- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

3.4 The proposed mix on this scheme is to provide for the majority of larger properties mainly 4 and 5 bedroom houses. This current mix is not acceptable and we recommend a larger proportion of smaller homes to meet the needs of first time buyers and those wishing to downsize as above.

4. Affordable Housing

4.1 This site were it to be delivered with a S106 planning obligation the affordable housing provided will be to meet district wide need; hence the **730** applicants registered is the important number.

4.2 The design and access statement accompanying this application proposes 9 'local needs' homes in perpetuity and with a strong local connection, offering affordable rent and shared equity tenure. It also offers two 'affordable homes' for the wider district. This is not in line with current local allocation policy requirements and a wider conversation has not taken place with Strategic Housing on this point. Only homes provided on a rural exception site will remain in perpetuity. This proposal offers shared equity on some of the homes. Current local policy looks to deliver shared ownership and affordable rent units in the first instance to meet housing need and affordability.

4.4 Both the proposed open market homes mix and the affordable element require amendment and we cannot support the proposed housing mix on this application in its current form. Therefore please note our objection and that we welcome a discussion with both the planning officer and applicant going forward.

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: Abby Antrobus
Direct Line: 01284 741231
Email: abby.antrobus@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2018_05313
Date: 07/12/2018

For the Attention of Jo Hobbs

Dear Mr Isbell

**Planning Application DC/18/05313 – Land on the South Side of Bildeston Road, Offton:
Archaeology**

This site represents a relatively large area which has not been systematically assessed for archaeological remains. There are hints of Iron Age and Roman activity recorded from findspots in the wider area (County Historic Environment Record OFF 021, OFF 014, OFF 006), and topographically the site lies on a slope over a watercourse. There is potential for the discovery of below-ground heritage assets of archaeological importance within this area, and 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 2018* (Paragraph 199), 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 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 Condition 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 (2018).

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 archaeological evaluation of the site would be required in the first instance. Decisions on the need for further work (excavation, monitoring of contractor's groundworks) would be made on the results of the evaluation.

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 Abby Antrobus

Senior 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/F216245
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 03/01/2019

Dear Sirs

Land to the south of Bildeston Road, Offton, Ipswich IP8 4RR
Planning Application No: DC/18/05313
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: guy@countryhousehomes.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: 3 January 2019

Planning Ref: DC/18/05313

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land to the south of Bildeston Road, Offton, Ipswich IP8 4RR
DESCRIPTION: 32 dwellings
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

Created: September 2015

Enquiries to: Fire Business Support Team

Tel: 01473 260588

Email: Fire.BusinessSupport@suffolk.gov.uk



Dear Sir/Madam

Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

Dispelling the Myths of Automatic Fire Sprinklers

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

Promoting the Benefits of Automatic Fire Sprinklers

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.

- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

The Next Step

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Mark Hardingham

Chief Fire Officer

Suffolk Fire and Rescue Service

Planning Policy consultation response 10th Dec 2018

DC/18/05313 – Outline for 32 dwellings (Offton) (Case officer Mark Russell)

The emerging JLP is due for a second round of regulation 18 consultation early 2019. Therefore, limited to moderate consideration should be given in decision-making. The emerging JLP document contains a significant amount of evidence and justification work that has been undertaken. Therefore, it is important for the case officer to consider the direction the emerging joint plan is heading in for the purposes of decision-making. The latest NPPF (July 2018) emphasises the importance of a joint up plan-led approach.

The site in question was put forward for consideration through the 'call for sites' (Aug 2017) policy consultation (site ref: SS0160), the site was discounted. Since this time the site has been put forward further, also referenced as SS0160 for the purpose of consistency.

Offton is currently not designated as a settlement per se in accordance with any current adopted documents; consequently this also shows the rural nature of the area seen as countryside. The existing pattern and form of existing development is minor scattered rural clustered development, which meanders around poor rural road networks that lack services, facilities or quality infrastructure that is capable to accommodate major development. The emerging JLP is in the process of designating Offton as a Hamlet settlement classification, which is an unsustainable classification for major growth.

The proposal represents a disproportionate level of major growth within a remote rural location that would continue to create a detached, rural clustered approach. This does not sustainably align with the direction of the emerging JLP or address cumulative social or environmental impacts that would be a consequence of the major proposal in this remote rural location poorly connected to services, facilities or any main settlement.

There are known flooding issues in the area and a small part of the site is within flood zone 3. The majority of the site is within a Special Landscape Area - Rolling Valley Farmlands therefore there is landscape impacts to be considered in this remote rural location. Furthermore there is a SSSI site located less than 200m to the north of the site, which all interlinks with the environmental and ecological connections of the site to the wider rural connections.

The site is not considered suitable and the planning policy team recommends the application is refused.

The policy team have not assessed this application from a detailed material consideration perspective (such as fully understanding planning constraints or planning history of the site) only broadly looked at the site from a principle perspective and explained at what stage emerging planning policy documents are at for appropriate consideration and weighting by the case officer in their planning assessment and weighted decision. Therefore, there may be further detailed material issues with this site.

If the policy team can be of any further assistance for advice in this case please don't hesitate to make contact.

Regards,
Elizabeth Thomas
Senior Policy Strategy Planner, Planning Policy Team

Sent: 10 December 2018 16:44

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Mark Russell <Mark.Russell@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/18/05313

Good Afternoon,

Thank you for this consultation. However, this scheme is for housing and community facilities, therefore Economic development have no comment to make.

Kind Regards

Clare

Economic Development Officer – Open for Business team Babergh and Mid Suffolk District Councils – Working Together

From: David Pizzey <David.Pizzey@babberghmidsuffolk.gov.uk>

Sent: 05 June 2019 10:06

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

Subject: DC/18/05313 Offton

Hi Mark

I have no objection to this application. The trees proposed for removal are of insufficient value to warrant being a constraint and the protection measures outlined for those scheduled for retention are in accordance with good practice.

Hope this helps.

Regards

David

David Pizzey FArborA

Arboricultural Officer

Tel: 01449 724555

david.pizzey@babberghmidsuffolk.gov.uk

www.babergh.gov.uk and www.midsuffolk.gov.uk

Babergh and Mid Suffolk District Councils – Working Together



27 February 2019

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/18/05313
Location: Land On The South Side Of Bildeston Road Offton Ipswich Suffolk IP8 4RR
Proposal: Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information

Summary

We have reviewed the Preliminary Ecological Appraisal (The Landscape Partnership Ltd, January 2019) and the Interim Ecological Impact Assessment (The Landscape Partnership Ltd, July 2018), submitted by the applicant, relating to the likely impacts on Designated Sites, Protected species and Priority species/habitats.

We are not satisfied that there is sufficient ecological information has been provided for determination of this application.

This is because the Interim Ecological Impact Assessment indicates that further surveys are required for Hazel Dormice, which will need to be provided prior to determination. Therefore, the LPA does not have certainty of impacts on this European Protected Species and therefore cannot make a lawful decision based on the current data provided.



The Interim Ecological Impact Assessment has also indicated that the proposed development would trigger consultation with Natural England, because the site is situated within the Impact Risk Zone of Middle Wood Offton SSSI and meets the following criteria: *'all planning applications outside or extending beyond existing settlements and urban areas, affecting greenspace, farmland, semi-natural habitats or features such as trees, hedges, streams, and rural buildings or structures, except householder applications'*. Consequently, we recommend that the applicant directly consults Natural England on this matter, as Middle Wood Offton SSSI has not been highlighted within Natural England's initial response (December 2018 – Ref: 267195).

In addition, the site is situated within the 13km Zone of Influence (ZOI) for the Stour and Orwell Estuaries SPA & Ramsar, as highlighted within Natural England's consultation response (December 2018 – Ref: 267195) . Therefore, Natural England's advice should be followed to ensure that impacts are minimised from increased recreation from the new residential development (in combination of other plans and projects) to the coastal Habitats Sites.

The LPA is therefore advised that a financial contribution should be sought towards the emerging Suffolk RAMS, from the residential development within the 13 km ZOI specified. This contribution will need to be agreed in principle prior to determination and secured by a unilateral legal agreement prior to commencement, to allow delivery of offsite mitigation measures prior to occupation. The LPA will also need to prepare a HRA Appropriate Assessment Record to determine any adverse effect on site integrity and secure the offsite mitigation for the the Stour & Orwell Estuaries SPA & Ramsar site.

We advise that the applicant discuss this matter with the Local Planning Authority prior to submission of any details.

This further information is necessary for the LPA to have certainty of impacts for designated sites, Protected and Priority species for this application and to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

We therefore look forward to working with the LPA and the applicant to provide the missing information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)

Junior Ecological Consultant

Place Services at Essex County Council

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.

Date: 20 December 2018
Our ref: 267195
Your ref: DC/18/05313



Mark Russell
Mid Suffolk District Council
planningblue@babberghmidsuffolk.gov.uk

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

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Russell,

Planning consultation: Outline Planning Application (Access and Layout to be considered) Erection of 32No.dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

Location: Land On The South Side Of, Bildeston Road, Offton, Ipswich Suffolk IP8 4RR.

Thank you for your consultation on the above dated and received by Natural England on 05 December 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

Habitats Regulations Assessment - Recreational Impacts on European Sites

This development falls within the 13 km 'zone of influence' for the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, as set out in the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'). It is anticipated that new housing development in this area is 'likely to have a significant effect', when considered either alone or in combination, upon the interest features of European Sites due to the risk of increased recreational pressure caused by that development.

As such, we advise that a suitable contribution to the emerging Suffolk RAMS should be sought from this residential development whilst ensuring that the delivery of the RAMS remains viable. If this does not occur in the interim period then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission until such time as the implementation of this measure has been secured.

Notwithstanding this, Natural England's advice is that this proposed development, and the application of these measures to avoid or reduce the likely harmful effects from it, may need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment in view of the [European Site's conservation objectives](#) and in accordance with the Conservation of Habitats & Species Regulations 2017.

This is because Natural England notes that the recent [People Over Wind Ruling](#) by the Court of Justice of the European Union concluded that, when interpreting article 6(3) of the Habitats Directive, it is not appropriate when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site. The ruling also concluded that such measures can, however, be considered during an appropriate assessment to determine whether a plan or project will have an adverse effect on the integrity of the European site. Your Authority should have regard to this and may wish to seek its own legal advice to fully understand the implications of this ruling in this context.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of this ruling. In accordance with the Conservation of Habitats & Species Regulations 2017, Natural England must be consulted on any appropriate assessment your Authority may decide to make.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

Alice Watson
Consultations Team

ANNEX A

Natural England offers the following additional advice:

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 24 December 2018 09:14
To: Mark Russell <Mark.Russell@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/18/05313. Air Quality

Dear Mark

EP Reference : 252634

DC/18/05313. Air Quality

Land On The South Side Of, Bildeston Road, Offton, IPSWICH, Suffolk, IP8 4RR.

Outline Planning Application (Access and Layout to be considered) Erection of 32No.dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. etc

Many thanks for your request for comments in relation to the above development from the perspective of air quality. I can confirm that I have nothing to add in relation to air quality at the above development.

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk

Work: 07769 566988 / 01449 724715

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



Homes and Homelessness Strategies
CONSULTATIONS
Is now **LIVE for 6 weeks!**
Click this image to have your say.



Dear Mark

EP Reference : 255613

DC/18/05313. Land Contamination

Land On The South Side Of, Bildeston Road, Offton, IPSWICH, Suffolk, IP8 4RR.

Re-consultation: Outline Planning Application (Access and Layout to be considered) Erection of 32No.dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes . etc

Many thanks for your request for comments in relation to the above application. Having reviewed the application and supporting Phase I report by AF Howland Associates I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise 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

Work: 07769 566988 / 01449 724715

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



Minimum requirements for dealing with unexpected ground conditions being encountered during construction.

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*

2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

From: Chris Ward

Sent: 07 December 2018 09:46

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

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

Subject: RE: MSDC Planning Consultation Request - DC/18/05313

Dear Mark,

Thank you for consulting me about the proposed residential development at Land on the South Side of Bildeston Road in Offton. I have no comment to make, as the existing sustainable transport infrastructure is limited for commuting purposes, in addition to the development being too small to justify a Travel Plan in accordance with national planning guidance.

Kind regards

Chris Ward

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council



SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street,
Bury St Edmunds, Suffolk
Tel: 01284 774141
www.suffolk.police.uk

Planning Application DC/18/05313/OUT

SITE: 32 Dwellings at Land on the South side of Bildeston Road, Offton, IP8 4RR

Applicant: Mr Steven Phillips Country House Homes Ltd. Maidstone

Planning Officer: Mr Mark Russell

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

Dear Mr Russell

Thank you for allowing me to provide an input for the above outline planning application for the proposed development of up to 32 dwellings at land south side of Bildeston Road, Offton.

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

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

The overall layout of the site is well presented and provides an open access area with reasonable surveillance for the eastern side of the community orchard and community grazing areas and it is good to see that a number of properties are back to back, with no rear alleyways.

However, there are concerns which I will go into more detail, with regard to the far eastern footpath, linking the western side of castle lane and in particular the two pedestrian entrance areas along this footpath. As well as the security of vehicles by plots 8,10, and plots 26- 32, which have rear parking and the parking for the allotment area. There are also concerns regarding the security of the allotments, the allotted public reading room and the public community park.

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

NOT PROTECTIVELY MARKED
RESTRICTED/CONFIDENTIAL

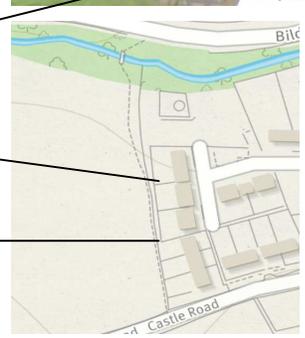
be well lit, especially where they encroach along pedestrian entrances into the plot and by vehicle parking areas?

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

1.0 GENERAL COMMENTS ON PROPOSED PLAN

- 1.1 I note that a number of plots have garages and some do not. Police prefer every property to have a garage in order to provide an area for vehicles to be secured.
- 1.2 Police prefer garages to be placed immediately next to properties rather than set back, as 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 into the rear of a property. I note that this is not the case with in this development. Where garages and car parking spaces are set back, police prefer active windows to be incorporated that look onto such areas to provide surveillance for a house holder and to deter unauthorised movement within such areas. 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).
- 1.3 If garages cannot be incorporated and certain plots will rely on open spaced parking, or car ports by the side of the property, it is strongly recommended that at the side of these properties dusk to dawn security lighting is installed to illuminate these areas that conforms to BS5489:2013 standards.

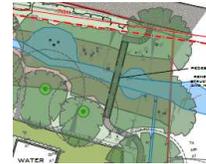
- 1.4 The established right of way that is on the eastern side of the development by the western side of Castle lane that links south and north of the area is a concern as it is on the perimeter of the development by trees, hedging and the rear of properties on Castle Lane. I know any lighting plan will be forthcoming within the designs for this development, but it is strongly recommended that good LED evenly spaced column lighting is implemented along the whole of this eastern area path, especially at critical points where locals and possible offenders could be, such as the two footpath openings from Castle lane; the parking area by plots 8 and 10; around plots 24-25 and the footpath entrance area on Castle Road. The envisaged make up of this eastern perimeter area could lead to further man made pathway short cuts, especially from the area of the sewage treatment area at the far north end of Castle Lane.



- 1.5 I don't know how popular these two access points, or any other unauthorised trodden down man made routes could be? However, if this area is not well lit with the vegetation regularly maintained and cut back, it could become a flash point area where offenders could hide and wait for an unknown pedestrian or cyclist. In the winter months during the darker days this area again if not well lit could become an area that locals avoid for fear of such possibilities occurring. Users need to feel confident that these areas will be safe to access. Good down lighting can be implemented with back plates that will not provide light pollution to the nearby plots mentioned.

1.6 I do not know the width measurements of the eastern footpath running south to north of the plot, but as it could be a main access point it is advised that the width is in line with 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. Where vegetation is incorporated either side of any footpath, It is recommended that it is low growing and regularly maintained, to prevent hiding places for any would be offender. It is recommended 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).

1.7 I trust that the northern entrance to the new development by the eastern foot bridge will be well lit too and the vegetation on the southern side of the footbridge regularly maintained, as that too could be an area where an offender could linger and needs to be lit and wide enough in order to provide users with confidence to want to regularly traverse it.



1.8 I hope the developers will reconsider the designs for the parking spaces for plots 9,10 and the two visitor spaces allocated for that area. As in their current format they are in an allocated spot at the rear of these buildings, which provide no surveillance to retain any form of security for vehicles parked there.



1.9 I realise for developments such as this, space is not at a premium, however, the police strongly discourage the siting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, antisocial behaviour, (including 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.

1.10 Again knowing space is not at a premium it is good to see that plots 26-32 have garages allocated to allow these plot owners to secure their vehicles. However, these plots are at the rear of their respective properties and they have adjoining open parking spaces, which because they are also allocated next to them at the rear of properties, have no surveillance from any active rooms to assist in deterring and identifying any offender. As there is no active surveillance it would be good if these areas too had good evenly spaced LED white lighting in order for anyone to be seen by passers-by or anyone who may be walking round the public community park.

1.11 Research regarding burglaries has shown that around 85% of unlawful entries occur via the rear of a property. I trust that the rear gates for all properties especially those by plots 25-32 will have good locking mechanisms that only residents have access for and all these gates should have retainers fitted to automatically close on entry/exit. (SBD 2016 refers, under “Rear Access Footpaths”, pages 21-17 at paras 13.1-13.4).

1.12 It is good to note that the community orchard and community grazing land will be enclosed by fencing on all sides and only one entrance which will be gated. However, it is possible that this land could be used by off road bikers. It is advisable that after hours it’s either properly secured, or disabled friendly chicanes/ barriers are erected such as those pictured right.



1.13 I would appreciate confirmation that any SUDs areas that are liable to have the capacity to be reasonably deep should be railed off on both sides, particularly the SUD area that encompasses the foot bridge and other area between plots 29-30.

1.14 I would appreciate more information on how the boundary perimeter on the western side will be secured, particularly in the south western corner by the already established Castle Cottage.

1.15 I would like to obtain more details on the makeup of the reading room and if it will be secured and if there will be any dedicated opening hours? If this building is not properly securable, it could very well be the subject of criminal damage, theft and antisocial behaviour. As this building is near the far western side of the development and away from any form of surveillance from any nearby housing, the building and the area around it could very well become a congregating area that could lead to various forms of offending already mentioned.



1.16 I would like more clarification on how the allotment area will comprise, in particular it is preferable if there is only one way in and out of the location by the car park and that the entrance is secured by some form of lock such as a combination lock, or digital key pad that only authorised personnel would have the details for. At present I cannot tell if there are two entrances one by the western side and one by the parking area, or if the parking area has two entrance/exits. The entrance/exit area on the western side by plot 29 is a concern as it looks like this would be an area with very little surveillance and little if any, lighting.



1.17 As allotments tend to suffer from antisocial behaviour, criminal damage and theft, it would be good to see the perimeter well secured with either good quality weld mesh fencing or more environmentally friendly defensive vegetation such as, Hawthorn, Blackthorn, Pyrocantha, and Berberis etc. (SBD New Homes 2016, page 21, para 10.8.4 refers).

1.18 I realise space is tight for the area and in particular around the planned allotment area, but it would be good to see an area set aside for a secure building, such as an ISO shipping container, for allotment holders to secure away their tools and perhaps to store compost and produce.

Open Areas

2.0 **Public Open Space:** Such areas should be designed so that they cannot be used as parking areas etc. or an area for motor bikes/peds etc. to ride on. Secure fencing should be considered around the area. A maintenance and management plan should be observed and maintenance vehicle access should be secure.

2.1 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.

2.2 The open spaces must be designed with due regard for natural surveillance, with adequate resources in place to ensure its satisfactory future management.

2.3 That public open areas are not used as unauthorised parking areas, or for motorbikes or mopeds to ride on

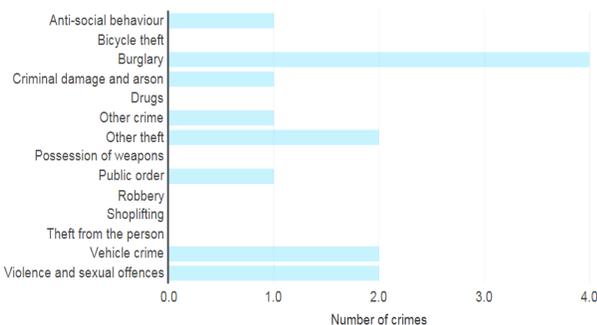
2.4 Any play equipment should be installed to meet BS EN1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.

- 2.5 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 2.6 Young persons' play areas should ideally be designed to so that they can be secured at night to reduce the threat of damage and graffiti.
- 2.7 All litter bins should be of a fire retardant material.

3.0 CRIME STATISTICS FOR CASTLE & BILDESTON ROAD, OFFTON AREA COVERING THE SURROUNDING IP8 4RR 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/+Hb8fNX/stats/#crime_stats



Crime type	Total	Percentage
Anti-social behaviour	1	7.14%
Bicycle theft	0	0.00%
Burglary	4	28.57%
Criminal damage and arson	1	7.14%
Drugs	0	0.00%
Other crime	1	7.14%
Other theft	2	14.29%
Possession of weapons	0	0.00%
Public order	1	7.14%
Robbery	0	0.00%
Shoplifting	0	0.00%
Theft from the person	0	0.00%
Vehicle crime	2	14.29%
Violence and sexual offences	2	14.29%

3.2 The graph left indicates a breakdown of the offences committed around this area between December 2017 to November 2018, totalling 14 offences, the majority 4 burglaries.

4.0 REFERRALS

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

4.2 The National Planning Policy Framework July 2018 in particular:
 a) Chapter 8: Promoting healthy and safe communities; Paragraph 91b; Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

b) Chapter 12: Achieving well-designed places; Paragraph 127(f); Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of

amenity for existing and future users⁴⁶; **and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.**

4.3 Further relevant information on security design can be found at:

a) The Suffolk Design Guide for Residential Areas- Shape of Development - Design Principles (Security).

b) Department for Transport – Manual for Streets (Crime Prevention).

4.4 Department for Transport – Manual for Streets (Crime Prevention)

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

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

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

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

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

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural

Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

5.0 BUILDING RECOMMENDATIONS

- 5.1** It is strongly advised the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 5.2** As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 replaced the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf
- 5.3** SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>
- 5.4** 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.
- 5.5** **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.**

6.0 FINAL CONCLUSION

- 6.1** It is further strongly recommended the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>
- 6.2** A further downloadable document can be obtained using the following link: <http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

- 6.3** It would be preferential to see the development, or at least the affordable housing built to Secured by Design SBD New Homes 2016 accreditation. Further information on SBD can be found at www.securedbydesign.com
- 6.4** To reiterate, the main concerns outlined are:
- a) The established right of way on the eastern side by Castle lane that links south and north of the area, as it is on the perimeter of the development by trees, hedging and the rear of properties on Castle Lane. It is strongly recommended good LED lighting is implemented, especially at critical points, such as the two footpath openings from Castle lane, by the parking area by plots 8 and 10, plots 24-25 and the footpath entrance area on Castle Road (page 2, paras 1.4 refers).
 - b) The envisaged make up of this eastern perimeter area could lead to further man made pathway short cuts, especially from the area of the sewage treatment area at the far end of Castle Lane (page 2, paras 1.5 refers).
 - c) Communal footpaths should be at least 3m across to allow people to pass one another without infringing on personal space. Where vegetation is incorporated either side of any footpath, it should be low growing and regularly maintained, to prevent hiding places for offenders (page 3, paras 1.6 refers).
 - d) The pedestrian bridge by northern entrance should be well lit and vegetation on the southern side regularly maintained, to provide users with confidence to want to regularly traverse this area (page 3, paras 1.7 refers).
 - e) Rear car parking by plots 9,10 and the two visitor spaces have no surveillance to retain any form of security for vehicles parked there (page 3, paras 1.8 refers).
 - f) The garages for plots 26-32 are at the rear, with adjoining open parking spaces, there is no surveillance for the area from active rooms. It would be good to see LED white lighting in the area (page 3, paras 1.10 refers).
 - g) The community orchard and community grazing land could have unlawful usage from off road bikers, so it is advisable that it is either locked after hours, or that disabled friendly chicanes/ barriers are erected. (page 3, paras 1.12 refers).
 - h) The SUDs areas encompassing the foot bridge and between plots 29-30 should be railed off on both sides (page 4, paras 1.13 refers).
 - i) How the boundary perimeter on the western side will be secured, particularly in the south western corner by Castle Cottage (page 4, paras 1.14 refers).
 - j) If the reading room will be secured and if there will be any dedicated opening hours, as it could be the subject of criminal damage, theft, congregating and antisocial behaviour (page 4, paras 1.15 refers).
 - k) How the allotment area will comprise, preferably with only one way in and out of the location by the car park and that the entrance is secured by some form of lock such as a combination lock, or digital key pad and only authorised personnel have access (page 4, paras 1.16 refers).
 - l) The entrance/exit area on the western side by plot 29 looks like the area may have poor lighting and a lack of surveillance (page 4, paras 1.16 refers).
 - m) Allotments tend to suffer from antisocial behaviour, criminal damage and theft, it would be good to see the perimeter well secured with either good quality weld mesh fencing or more environmentally friendly defensive vegetation (page 4, paras 1.17 refers).

- n) It would be good to see an area set aside for a secure building, such as an ISO shipping container, for allotment holders to secure away their tools and perhaps to store compost and produce (page 4, paras 1.18 refers).**
- o) That public open areas are not used as unauthorised parking areas, or for motorbikes or mopeds to ride on.**

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

From: Jason Skilton <Jason.Skilton@suffolk.gov.uk>
Sent: 13 May 2019 07:43
To: Stuart Macmillan <stuart.macmillan@ctp-llp.com>; Guy Osborne <guy@countryhousehomes.co.uk>
Cc: zach@countryhousehomes.co.uk; Mark Russell <Mark.Russell@babberghmidsuffolk.gov.uk>
Subject: RE: A5689 - Land On The South Side Of, Bildeston Road, Offton, Ipswich IP8 4RR Ref DC/18/05313

Hi Stuart and Guy

Looking at the second set of results produced by AF Howlands Associates from December 2018, it does appear that an acceptable worst case rate of infiltration achieve would be acceptable.

Its normally required that three trial pits are dug and tested. In this instance I note that only two trail pits have been dug and tested, and of these trial pits only one was in the area proposed to be developed.

However, as you have a second viable method for the disposal of surface water e.g. controlled discharge to a watercourse, as well, I maybe able to condition further testing.

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/>

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/18/05313

PROPOSAL: Outline Planning Application (Access and Layout to be considered) Erection of 32No. dwellings comprising 9 Local Need Homes, 2 Affordable Homes, 21 Open Market Homes and public reading room. Creation of new accesses to Bildeston Road and Castle Road, 9 parish allotments and a community car park.

LOCATION: Land on The South Side of Bildeston Rd Offton Ipswich Suffolk IP8 4RR

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

We have reviewed the data supplied with this application, the summary of our findings are as follows:

- The proposed visibility splays for the accesses are sufficient for this application.
- The proposal for 32 dwellings would create approximately 19 vehicle movements within the peak hour (1 vehicle every 3 minutes) therefore the additional vehicles from the development will not affect the capacity of the highway network in the area.
- Castle Road is a single lane narrow road with no footways and is a no-through road. The pedestrians from the development will be walking in the road, detrimental to highway safety and contrary to the objectives of the NPPF. The lack of a footway will also encourage a probable increase in unsustainable methods of travel to and from the site by future residents.
- The catchment primary school is 1.8 miles from the site. The closest bus stop are within walking distance but there is not a continuous footway link.
- As there is not adequate footway or verge for pedestrians to step off the highway, it is not considered a sustainable location from a transport policy perspective.

Although this is an outline planning application, we would like to mention we have concerns about parking allocations for this development. The parking layout for Plots 18 and 19 are shown in a layby which is not in line with Suffolk Guidance for Parking 2015. Also, the places for plots 25 to 32 are at the back of the properties and the residents tend to park as close to the entrance of their house as it's 'more convenient'. This will lead to parking on the footways and verges.

Public Footpath 26 is recorded through the proposed development area. Whilst we do not have any objections to this proposal, the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

No aspect of this proposal warrants an objection to be raised by SCC. Therefore, notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the condition shown below:

CONDITIONS

V 1 - Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 500/DP/004-A 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.

AL10 - Condition: Before the development is commenced, details of the access and associated works, (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.

HGV CONSTRUCTION - 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
- details of provision to ensure pedestrian and cycle safety
- 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.

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging points and secure cycle storage shall be submitted to and approved in writing by the Local Planning

Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

B 2 - 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.

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.

The proposal will require works being carried out to / in an ordinary watercourse / the piping of a ditch. As the proposal requires work affecting an ordinary watercourse, including a ditch, whether temporary or permanent, then consent will be required from Suffolk County Council's Flood and Water Management team before those works can commence. Application forms are available from the SCC website: <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/working-on-a-watercourse/> Applications for consent may take up to 8 weeks to determine and will incur an additional fee.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure