

DC/19/00646 – Outline planning application (all matters reserved), erection of up to 65 dwellings with attenuation basin, land on the west side of Broad Road, Bacton

This application was considered at a meeting of Cotton Parish Council on February 27, 2019. In addition to Parish Councillors, ten members of the public were present including representatives from Bacton Parish Council. During public discussion there was no support for the application.

After discussion it was unanimously agreed by the Parish Council to oppose the application.

Parish Council feels very strongly that:

- Proposals to improve the railway under-bridge will in reality not solve the hazards presented by this access route to Bacton's central facilities (**and that access will be essential to the fundamental sustainability of the site**). There is simply not enough width or height under the bridge to ensure safe movement by any significantly sized vehicle, pedestrian and cyclist. There is insufficient space for a roadway and a parallel pathway. If a safe solution to the problem of the under-bridge had been available it would have been actioned long ago; building more houses on the "wrong" side of the bridge will achieve nothing other than to make the problems worse.
- Further completed and approved housing developments in Bacton, Finningham and other nearby settlements have increased traffic volumes on Station Road and Broad Road since the 2015 planning permission. Cotton's own traffic data, gathered by the Parish Council's Vehicle Activated Speed sign, have demonstrated a consistent pattern of excessive speeds on those routes. The speed of travel, volume of vehicles and the hazards presented by the under-bridge is a dangerous cocktail which the construction of more houses will do nothing to alleviate.
- The failure to build the 47 houses approved by the (contested) planning approval in 2015 is not a reason to approve a larger number of houses on the same site. 65 unbuilt houses is no better for the District Council's land-supply problem (if it has one) than 47 unbuilt houses. It is more likely to be a clear indication that the site is unsuitable for any number of houses because of the inaccessibility by foot, cycle and public transport of the basic amenities available in Bacton.
- It continues to be essential to the character of the countryside to maintain

- a physical separation between Bacton and Cotton; construction of 65 houses on this site will reduce that separation to vanishing point.
- Because of the position of the site, its development is not sustainable; access to Bacton's facilities is not realistic and Cotton does not offer an alternative range of facilities.

These grounds for opposition include and complement those stated in relation to the previous application for this site in 2015, which should also be considered:

“The Parish Council acknowledged the planning application is in Bacton Parish but that there are many knock-on implications for the residents of Cotton and other neighbouring communities and road users.

Reasoning based on the National Planning Policy Framework for sustainable development:

1. Conserving and enhancing natural environments

- *The area covered by this application is an open piece of countryside dividing the villages of Cotton and Bacton. As such it is the buffer between the two villages and is the outline of the natural boundary. (This issue was specifically held as a matter of value in the recent findings of a planning appeal for some nearby land in Cotton).*
- *The housing development would be out of character of the local rural ribbon development and would give the area an urban look with curbing, pavements and street lighting it currently does not have nor want.*
- *Most of the local villages have much casual flow of pedestrians, cyclists and car users, with many opportunities to ‘stop and chat’. This development will be a car-based housing estate of residents having to journey to anything they attend. It is unlikely the residents will be part of either Cotton or Bacton communities by default.*

2. Re-use of brownfield sites

- *Bacton has other sites available for development which are nearer the centre of the settlement and nearer to public services.*
- *There is also a centrally located brownfield site, which has received considerable local support recently for development.*

3. Fullest possible use of public transport, walking, cycling

- *The proposed development is detached from Bacton village centre by at*

least 1.5km.

- *There is minimal public transport available to mitigate the use of private motor cars.*
- *Foot access to the village centre services is dangerous and will still be so with the proposed footpath beside a road where speeding is acknowledged to be an issue.*
- *The railway under-bridge has been the subject of considerable local debate. It is a traffic hazard for vehicles in that it has obstructed sight lines, a dip under the railway which causes flooding and a height restriction. For pedestrians and cyclists this railway bridge is dangerous, for car drivers it is hazardous and in peak times causes congestion.*
- *During school term time the increasingly busy junior school attracts enormous vehicle congestion on a busy road at the start and close of the school day. Additional vehicles and children will make this area more dangerous than it already is.*
- *Foot access to the countryside will involve the crossing of a busy road as above.*
- *Cycling will similarly be hazardous for young cyclists and 'a reasonably safe cycle area for a confident cyclist' according to the Highway and Transport Review. It is, therefore, unlikely cycling will be a chosen means to get to the school.*
- *The application acknowledges most access to and from the development will be by private car.*

4. Community and cultural facilities to meet local needs

- *There are no easily accessed facilities in Bacton other than those requiring a car journey. The church, village hall and school in Bacton all have considerable parking difficulties.*
- *Considerable extra pressure will be placed on already-stretched GP and other community health services.*
- *Cotton has nearer facilities at the village Hall and Pub, both of which would require the crossing of an unlit B class road and a walk down a country lane with no street lighting or footpath. Cotton has no other facilities other than a church.*

5. Viable infrastructure

- *Because of the detached nature of the development there is no easily accessible infrastructure. The road network combined with an inherently dangerous railway under-bridge would make this a detached community with no local infrastructure other than a local car sales site.*

6. Sustainable modes of transport

- *Most residents in this community will be served by their own private cars. The location of the site makes this a given, which is acknowledged by the Highway and Transport Review (see comments below).*

7. Mixed developments with houses commensurate with planned need

- *Sadly no housing needs assessment has been produced for Bacton so it is difficult to see if this development satisfies any perceived need.*

8. All housing should enhance the quality of the area

- *The planned development is two agricultural fields sandwiched between a busy railway line on an embankment and a busy B class road. The railway line is designated to run faster and therefore louder trains very soon and the road is likely to become busier and noisier too. To install a substantial housing development into this mix will not enhance the quality of this rural area.*
- *Living in such a development will not be part of tranquil rural village life.*
- *Cotton specifically does not have any street lighting, it is likely a concentrated housing development will attract considerable electric lighting, further detracting from the countryside and skylines of the locality.*

9. Incorporate green spaces and support transport networks

- *This development has no accessible green spaces other than private gardens.*
- *There are no regular wide ranging support transport networks. The bus service is limited and not easy for commuting to nearby urban areas of employment.*
- *There is very limited employment locally.*

10. Reducing Flood Risk

- *This area of Cotton has a complicated network of ditches, drains and culverts made more difficult because of the railway embankment.*
- *Long-term residents, home owners and land owners speak of various flooding incidents in the immediate area over a long period of time.*
- *Houses in Broad Road have been built over filled-in ditches and over-piped drains, there is therefore of great concern that any development would upset the current water levels and drainage system such that people's houses, agricultural land or the road itself would be put in peril.*

11. Permission not to be given unless character of area is enhanced and the way it functions

- *Cotton Parish Council is of the view that this development will not enhance either the villages of Cotton or Bacton.*
- *There are better and more appropriate sites available for development in Bacton, ones which have received local public support and would fulfil the criteria for 'sustainable development' more appropriately.*
- *The development physically is separated from the Key Service Centre to which it belongs and it is not in context with the important rural divide between the two communities*

12. Applicants should work closely with those affected

- *Sadly, there has been no informal contact between the developer and Cotton Parish Council about this development.*
- *Clearly Cotton residents will be impacted proportionately more than Bacton residents.*
- *The added access point(s) onto Broad Road and the additional traffic added to the already dangerous railway under-bridge will affect all the local residents and businesses and road users from much further away.*

13. Ensure there are sufficient school places available

- *With a significant increase in houses locally there must be a knock-on effect to the local schools, presumably this will be factored into the planning process, more importantly the impact of additional cars used to convey children to and from Bacton Primary School will make a difficult and dangerous traffic hazard even worse. County Council calculations indicate that 13 extra primary school pupils will need to find school places*

if 65 houses are built.

14. Access to sports and recreational facilities

- *There are no such facilities proposed on the development.*
- *The nearest facilities are very basic ones in Cotton or more comprehensive ones in Bacton but those will involve a tricky walk or cycle journey. More likely a trip in the car.*

Extracts from the Highway and Transportation Review submitted as part of the Planning Application, shown together with comments from Cotton Parish Council.

1. *'The development is 1.5km from Bacton Village Centre' - this illustrates the distance residents would be from local services and the greater likelihood of them using motor cars rather than other means.*
2. *Reasonably busy at peak times - this is a subjective assessment, locals would argue it is reasonably busy at all times and even busier at peak times.*
3. *Average vehicle speed seemed higher than the speed limit - locals would agree with this assessment citing the fact that the local Constabulary would not authorise Community Speed Watch because the road is too dangerous. The increased use of Broad Road by emergency vehicles at speed because of the rearrangements of Police operational bases, also the increasing use of the road by speeding leisure motorcyclists is increasing average speeds and noise year on year.*
4. *Pound Hill the only route to the village (Bacton)- this is correct, implicit in that is the need to negotiate the railway under-bridge which is described in the sections above.*
5. *Possibly two access points- the number of access points to the development is not shown in the application but a second access point is inferred in this report. Any access point will bring with it dangers, two would double those dangers.*
6. *For 47 houses 38 vehicle movements in peak times - local experience is that each household will have at least two cars, an assessment of 38 vehicle movements at peak times seems a gross underestimate. Any increased vehicle turnings will bring additional noise, pollution and danger.*
7. *We consider that as the road into and out of Bacton is unlikely to be very*

heavily trafficked that a one way working system be introduced - this road is very busy at peak times, particularly boosted at school times. A one way system of any sort would be a major traffic hazard for local people and the many drivers who use this as a rat-run to and from the A14.

8. *The site is just about within walking distance of the village centre and some residents might walk - the conditional words in this statement 'just about' and 'some' are clear indications that the author of the report anticipates most journeys will be by car.*
9. *Reasonably safe cycle area for a confident cyclist - as above, the conditional words used to describe the safety of pedal cyclists using these roads indicates the dangers of cycling on a busy B road and designated lorry route and trying to safely negotiate the railway crossing.*
10. *Overall the site does not score too highly in relation to its accessibility profile as most residents would be reliant on private mean of travel.- this gross understatement just about sums it up!"*

Rod Caird

Clerk, Cotton Parish Council

March 5, 2019

Your Ref:DC/19/00646
Our Ref: SCC/CON/0684/19
Date: 15 August 2019



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

Email: planning@babberghmidsuffolk.gov.uk

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

For the attention of: Vincent Pearce

Dear Vincent,

TOWN AND COUNTRY PLANNING ACT 1990

APPLICATION REF: DC/19/00646

PROPOSAL: Outline Planning Application (All matters reserved) Erection of up to 65 No dwellings with attenuation basin.

LOCATION: Land On The West Side Of Broad Road Bacton

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 65 dwellings would create approximately 40 vehicle movements within the peak hour (1 vehicle every 1.5 minutes) therefore the additional vehicles from the development will not have a severe impact on the capacity of the highway network in the area.
- The closest bus stop is 150m from the centre of the site with minimal public transport services.
- There is a proposal to create a footway from to Pound Hill therefore provided links for pedestrians and school and the amenities within the village.

The development would not have a severe impact on the highway network (NPPF para 109) therefore we do not object to the proposal.

CONDITIONS

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

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.

V 1 - Condition: Before the access into the site is first used, visibility splays shall be provided with an X dimension of 2.4 and a Y dimension of 90m 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.

HW 1 - Condition: Prior to commencement of any works (save for site clearance and technical investigations) details of the footway link and highway improvements (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing to the Local Planning Authority in consultation with Local Highway Authority. The details as agreed shall be delivered in accordance with a timetable for improvement which shall have been submitted to and agreed in writing by the LPA concurrent with the said details.

Reason: To ensure that design highway improvements/footways are constructed to an acceptable standard.

HW 2 - Condition: Before any dwelling is first occupied, the developer shall deliver the footway and highway improvements on Pound Hill in accordance with the approved details except with the written agreement of the Local Planning Authority

ER 1 - Condition: Prior to commencement of any works, (save for site clearance and technical investigations) 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 in consultation with Local Highway Authority.

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

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 units 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 and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

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

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

HGV 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
- maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

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.

NOTES

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

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

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Vincent Pearce – Principle Planning officer

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

Date: 1.3.2019

SUBJECT: - **Application Reference: DC/19/00646**

Proposal: Application for Outline Planning permission (All matters reserved) for residential development of up to 65 new homes with attenuation basin on land west of Broad Road, Bacton.

Key Points

1. Background Information

A development proposal for up to sixty-five (65) residential dwellings
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This is an open market development and should provide 23 affordable housing units which = 35% . This is included in the proposal so is policy compliant
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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

2.7 This site is a S106 planning obligation application, so the affordable housing provided will be to meet district wide need hence the **730** applicants registered is the important number.

3. Preferred Mix for Open Market homes (65). There is no indicative mix provided for this site.

We would want to see a good mix of property types and sizes on the scheme. In recognition of the number of over 55's we have in Mid Suffolk, and the projected increase in number of households over 65, we would expect to see at least 8 of the dwellings in the form of bungalows, either 2 or 3 bedrooms and 20% of the open market homes as 2 bed houses. This is to reflect the dwelling types secured on the other recent planning permissions in Bacton over the last 2 years.

- 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.

4. Preferred mix for Affordable Housing (22).

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 730 applicants registered who have a connection to Mid Suffolk.

4.2 The application has listed the proposed affordable housing as: -
Affordable Rented

- 2 x 1 bed 2-person flats @ 50 sqm
- 2 x 2 bed 3-person houses @ 61 sqm
- 8 x 2 bed 4-person houses @ 79 sqm
- 4 x 3 bed 5-person houses @ 93 sqm

Shared Ownership

- 4 x 2 bed 4-person houses @ 79 sqm
- 2 x 3 bed 5-person houses @ 93 sqm

The proposed affordable housing mix for this site is acceptable and based on my previous pre-application advice.

The above mix is requested and to be included in the S106 agreement at the size I have requested.

5. Other requirements for affordable homes:

- Properties must be built to current Homes England standards
- The council is granted 100% nomination rights to all the affordable units on first lets and 75% on relets
- Affordable housing units must be transferred freehold to an approved RP.
- Shared ownership to have a maximum initial share purchase limit of 70%.
- Where there are more than 15 affordable units, they should not be located in clusters of more than 15 units.
- Adequate parking provision is made for the affordable housing units

Julie Abbey-Taylor, Professional Lead – Housing Enabling

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 25 February 2019 10:22
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Cc: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Subject: 2019-02-25 JS reply Land On The West Side Of, Broad Road, Bacton, Ref DC/19/00646

Dear Vincent Pearce.

Subject: Land On The West Side Of, Broad Road, Bacton, Ref DC/19/00646

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/00646.

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

- Site Location Plan (no reference)
- Flood Risk Assessment and Surface Water Drainage Strategy ref 1369/RE/11-14/01 Rev B
- Land Contamination Survey ref OES15-002EGA/1

The reason why we are recommending a holding objection is because whilst the applicant has evaluated the flood risk for the site, but there is insufficient information regarding the proposed method for the disposal of surface water in line with national and local policy/guidance.

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

1. Amend the reference documents to reflect Suffolk County Councils latest publications
 - a. <https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/>
2. Infiltration test to BRE 365 digest are to be submitted as the BGS lists the soil type as Diamicton which has variable infiltration characteristics
 - a. Subject to a up to date land contamination report being submitted and accepted
3. Submit evidence that the applicant has either the riparian ownership rights of discharge or a 3rd party agreement to discharge surface water into the watercourse in perpetuity
4. Amend the Flood Risk Assessment and Surface Water Drainage Strategy ref 1369/RE/11-14/01 section 5.5.11, as side slopes of the basin shall be no greater than 1:4 for the proposed depth
 - a. Local policy takes precedence over Ciria SuDs guidance

Kind Regards

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

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

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

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

From: planningyellow@baberghmidsuffolk.gov.uk <planningyellow@baberghmidsuffolk.gov.uk>

Sent: 15 February 2019 15:20

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

Subject: MSDC Planning Consultation Request - DC/19/00646

Please find attached planning consultation request letter relating to planning application - DC/19/00646 - Land On The West Side Of, Broad Road, Bacton, Suffolk

Kind Regards

Planning Support Team

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From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 19 February 2019 11:11
To: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/19/00646. Land Contamination

Dear Vincent

EP Reference : 255674
DC/19/00646. Land Contamination
Land on the west side, Broad Road, Bacton, STOWMARKET, Suffolk.
Outline Planning Application (All matters reserved) Erection of up to 65No dwellings with attenuation basin.

Many thanks for your request for comments in relation to the above application. Having reviewed the Phase I report by Oakridge Environmental I can confirm that the report highlights little of concern. However, we would welcome the applicant providing an update on the report owing to the fact that the report is somewhat dated and may not reflect current site circumstances and development proposal. This may take the form of a simple letter stating that conditions have not changed or if circumstances have changed then the letter should outline the nature of the changes since 2015.

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



Your ref: DC/19/00646
Our ref: Bacton – land on the west side of
Broad Road 00058185
Date: 20 February 2019
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Vincent,

Bacton: land on the west side of Broad Road – developer contributions

I refer to the proposal: outline planning application (all matters reserved) – erection of up to 65No dwellings with attenuation basin.

Outline planning permission for the erection of up to 47 dwellings was previously granted planning permission under reference 0764/15. A completed planning obligation dated 05 April 2016 is attached to this planning permission.

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 some 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

As of 06 April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. The requirements being sought here would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

The details of the impact on local infrastructure serving the development is set out below and, apart from the proportionate contributions towards the build costs of a new primary school, 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 65 dwellings, namely:

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

The local catchment schools are Bacton Primary School and Stowupland High School.

The primary school strategy for the village is to deliver a new primary school on land which is part of the former Middle School site in Bacton.

The County Council will require proportionate developer contributions for the build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 16 primary age pupils forecast to arise from the proposed development is calculated as follows

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 65 dwellings it is forecast that 16 primary age pupils will arise

- Therefore, 16 pupils x £16,429 per place = £262,864 (2018/19 costs)

Based on existing secondary school forecasts, SCC will have no surplus places available at the local schools. On this basis, at the secondary school level a future CIL funding bid of at least £279,981 (2018/19 costs) will be made.

School transport contribution – 12 secondary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Annual school transport cost per pupil is £960. Therefore, contribution is £960 x 12 pupils x 5 years = £57,600, increased by the RPI.

If the District Council considers that planning permission should be granted for up to 65 dwellings, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the proportionate build costs of the new primary school and secondary school transport costs. Contributions required are as follows:

- a) **Primary School Build Contribution** – £279,981, increased by the BCIS.
- b) **Secondary School Transport Contribution** – £57,600, increased by the RPI.

- 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 11 pre-school children arising which is equivalent to 7 FTE places (30 hours per week), at a cost per place of £8,333.

However, in the Bacton and Old Newton Ward there is currently a surplus of places.

- 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 109 says development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

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. £14,040, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

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. Ecology, landscape & heritage.** These are matters for Mid Suffolk District Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals.

10. Health impact assessment. An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.

11. 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.

12. 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.

13. 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.

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

Apart from the site-specific proportionate developer contributions for the new primary school, 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/Steve Merry/Luke Barber, Suffolk County Council
Floods Planning, Suffolk County Council

From: Iain Farquharson <Iain.Farquharson@babberghmidsuffolk.gov.uk>
Sent: 14 March 2019 12:33
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: M325672. MSDC Planning Consultation Request - DC/19/00646

Dear Sir/Madam

It is acknowledged that the application is for outline permission but considering the number of dwellings proposed some consideration of this topic area is expected. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability. We request a condition be added should permission be granted:

Before works extend beyond foundation level a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3 SO8 and NPPF para 35) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day). Details as to the provision for electric vehicles should also be included. This document shall be submitted to, and approved in writing by, the Local Planning Authority before works extend beyond foundation level.

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Clear commitments and minimum standards should be declared and phrases such as 'where possible, subject to, where feasible' must not be used.

Evidence should be included where appropriate demonstrating the applicants previous good work and standards achieved in areas such as site waste management, eg what recycling rate has the applicant achieved in recent projects to show that their % recycling rate commitment is likely.

Guidance can be found at the following locations:

<https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/>
<https://www.babergh.gov.uk/environment/environmental-management/planning-requirements/>

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

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



**Ipswich and East Suffolk
Clinical Commissioning Group**

Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

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

Your Ref: DC/19/00646

Our Ref: IESCCG/000219/BAC

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

05/03/2019

Dear Sirs,

Proposal: Outline Planning Application (All matters reserved) Erection of up to 65No dwellings with attenuation basin.

Location: Land on The West Side Of, Broad Road, Bacton, Suffolk

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

Background

2. The proposal comprises a development of up to 65 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is 1 GP branch practice within a 2km radius of the proposed development and this will have an impact on the main surgery. These practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

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

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

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Bacton Surgery (and its main practice Mendlesham Health Centre)	7,647	310.50	4,528	-14
Total	7,647	310.50	4,528	-14

Notes:

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

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

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

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

Yours faithfully

Chris Crisell

Estates Planning Support Officer

Ipswich and East Suffolk Clinical Commissioning Group

From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 11 March 2019 08:29
To: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC/19/00646. Air Quality:

Dear Vincent

EP Reference : 255675
DC/19/00646. Air Quality:
Land on the west side, Broad Road, Bacton, STOWMARKET, Suffolk.
Outline Planning Application (All matters reserved) Erection of up to 65No
dwellings with attenuation basin.

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

Kind regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk
Work: 07769 566988 / 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Mid Suffolk District Council
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/F221322
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 28/02/2019

Dear Sir/Madam

Land on the West Side, Broad Road, Bacton IP14 4NB
Planning Application No: DC/19/00646/OUT

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 firefighting, 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.

OFFICIAL

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 firefighting 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

Water Officer
Suffolk Fire and Rescue Service

c.c. Mr Edward Gittins & Associates
info@egaplanning.com

enc. Sprinkler Letter

Mid Suffolk District Council
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: Water Officer
Direct Line: 01473 260588
E-mail: fire.businesssupport@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 28 February 2019

Planning Ref: DC/19/00646/OUT

Dear Sir/Madam

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land on the West Side of Broad Road, Bacton IP14 4NB
DESCRIPTION: 65 Dwellings
NO: HYDRANTS POSSIBLY REQUIRED:

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

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

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

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

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

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

OFFICIAL

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

Yours faithfully

Water Officer

Water Officer
Suffolk Fire and Rescue Service

OFFICIAL

Thank you for your email.

We are returning this consultation without comment because we have checked the application and it is not clear why we have been consulted. Please find attached a consultation checklist which explains when to consult us.

If, after reconsideration, you still need us to comment on this planning application, please specify why. For discharge of conditions applications; we only comment on conditions that we have recommended. If you wish to re-consult us please tell us which condition we recommended.

If you confirm why we have been appropriately consulted, our 21 day statutory consultation period will start. If not, we will take no further action.

We have adopted this approach because we are currently receiving large numbers of inappropriate consultations. These significantly reduce the time and staff resources we have to provide you with timely statutory consultation responses.

Kind Regards

Liam Robson
Sustainable Places Planning Advisor – East Anglia Area (East) Environment Agency

From: SM-Defra-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 20 February 2019 15:27
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: Planning Consultation DC/19/00646 - NE Response

Dear Mr Pearce,

Thank you for your consultation.

Application ref: DC/19/00646
Our ref: 274207

Natural England has no comments to make on this application.

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

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

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

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

Yours sincerely

Clare Foster
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: 020802 68362
Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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Planning Application (DC/19/00646)

SITE: Outline Planning Application for 65 dwellings at Land West of Broad Road, Bacton, IP14 4NB

Applicant: Mr & Mrs GJ & CA Abbott, C/o Edward Gittins & Associates

Planning Officer: Mr Vincent Pearce

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

Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

Dear Mr Pearce

Thank you for allowing me to provide an input for the above planning application for the proposed development of 65 dwellings at Land West of Broad Road, Bacton.

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 hope the developers will seek Secure By Design (SBD) accreditation for this site, or at the very least seek this accreditation with regard to the allotted social housing areas.

Further information can be found at www.securedbydesign.com .

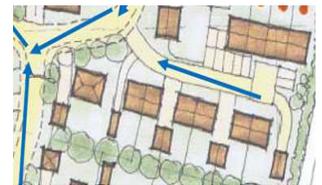
I would further strongly advise the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link:
<http://www.securedbydesign.com/sbd-national-building-approval/>

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

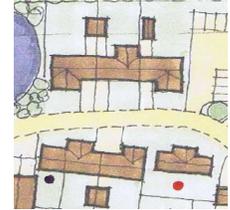
<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

I take on board that this is an outline proposal and further details will be forthcoming. As a result I feel that at present I do not have the level of detail I require to make specific individual comments in relation to 'designing out crime' for this application. However, the following points are of concern:

- a) **The amount of garages allocated to the side of drives, which are set back too far and allow an offender to enter the rear of these areas undetected. Designing garages and/or parking spaces set too far back, allows an offender easier access to the rear of a property without being seen, which is the more common method of entry preferred by most offenders. It is preferred that garages are flush by the side of properties. Secure By Design (SBD) New**



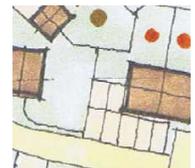
Homes 2016 section 1, para 16 entitled “Car Parking”, para 16.1- 16.2 and 16.5-16.7 pages 22-23 refers. Along with section 3 at para 52, also entitled “Car Parking”, (para 52.1-52.2, pages 62-63 refers).



b) The design for the properties to the east of the attenuation basin, looks like they will incorporate flying freehold (undercrofts), with rear parking. I hope this will not be the case? The police actively discourage the inclusion of flying freeholds (undercrofts), as they tend to offer no active surveillance and it is a proven fact that they are well known congregating areas for antisocial behaviour, including graffiti, theft and arson. It would be preferred if these designs could be altered, so that these areas and in particular the garages behind them will not become more vulnerable to crime. If these plots have to remain within this format, it is strongly recommended security gates are fitted and photocell dusk to dawn lighting that meets BS5489:2013 lighting standards is placed on the side of buildings in order to deter casual intrusions.

c) I am pleased to see that there does not appear to be any rear parking incorporated and I hope that remains the case. Police do not recommend rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, antisocial behaviour (including the gathering of groups of people) and graffiti. These areas allow an offender to go about undetected due to a lack of any form of surveillance from any surrounding properties and heighten the perceived threat of crime to residents and users. (SBD New Homes 2016, page 22, para 16.3-16.4 refers).

d) I would appreciate more information on the internal layout of proposed properties to ascertain if there will be active rooms to look onto vehicle parking spaces, such as by the location pictured right. Communal parking should be in small groups, close and adjacent to the front, or side of homes and must be within view of active rooms that will provide natural surveillance. Secure By Design (SBD) New Homes 2016 section 1, at para 16 entitled “Car Parking”, and (para 16.3-16.4 page 22 refers). Along with section 3 at para 52, also entitled “Car Parking”, (para 52.1-52.2, pages 62-63 refers).



e) I would appreciate future plans to ascertain the exact details of all the perimeter areas. I note that a number of rear perimeters from the outline drawings (pictured right) have hedging incorporated, if only hedging remains, then it is strongly recommended to deter intruders these perimeters comprise of defensive vegetation, such as Berberis, Pyrocantha or Hawthorn (SBD New Homes 2016 page 21, para 10.8.4 refers).



f) I would like more clarification how the western perimeter of the development will comprise, particularly around the western side of the attenuation basin where it runs alongside the main Norwich to London railway line (SBD New Homes 2016 page 20, para 10.6 refers).



1.0 **Street Lighting:** Lighting should conform to Section 18.1 SBD 2016, in particular, “Lighting in communal areas” which can be found in Section 25.2 SBD 2016. Lighting should conform to the requirements of BS 5489:2013. A luminaire that produces a white light source (Ra>59 on the colour rendering index) should be specified but luminaires that exceed 80 on the colour rendering index are preferred.

2.0 **Car Parking:** Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.

3.0 **Should any play equipment be installed it should meet BS EN 1176 standards and be**

disabled friendly. I Would recommend that any such area has suitable floor matting tested to BS EN1177 standards.

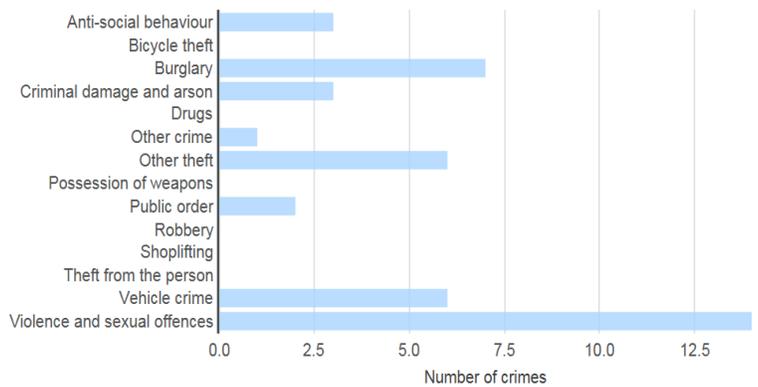
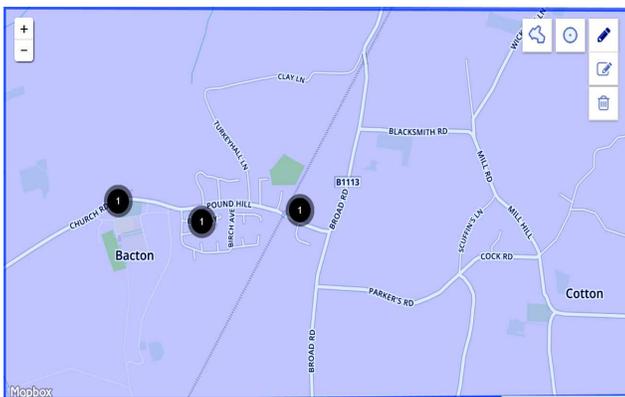
4.0 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.

5.0 All litter bins should be of a fire retardant material.

6.0 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.

7.0 **CRIME STATISTICS FOR BROAD ROAD, BACTON AND THE SURROUNDING IP14 4NB POST CODE AREAS**

8.0 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/+ISrlaK/stats/#crime_stats



Anti-social behaviour	3	7.14%
Bicycle theft	0	0.00%
Burglary	7	16.67%
Criminal damage and arson	3	7.14%
Drugs	0	0.00%
Other crime	1	2.38%
Other theft	6	14.29%
Possession of weapons	0	0.00%
Public order	2	4.76%
Robbery	0	0.00%
Shoplifting	0	0.00%
Theft from the person	0	0.00%
Vehicle crime	6	14.29%
Violence and sexual offences	14	33.33%

8.1 The graph left indicates a breakdown of the offences committed around this area between February 2018 to January 2019, totalling 42 offences, the majority involving violent and sexual offences totalling 14, followed by 7 offences relating to burglary. With 6 offences relating to theft.

9.0 **SECURE BY DESIGN (SBD)**

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

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

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

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

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

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

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

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

10.0 REFERRALS

10.1 One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19.

10.2 Section 17 of the Crime and Dis-Order Act outlines the responsibilities placed on local authorities to prevent crime and dis-order.

10.3 The National Planning Policy Frame work on planning policies and decisions to create safe and accessible environments, laid out in chapter 8, para 91b and chapter 12, para 127f, in that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

10.4 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security) Looking at the careful design of a new development with regard to landscaping, planting and foopaths.

10.5 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.

11.0 FINAL CONCLUSION

11.1 To reiterate, concerns around this development are:

- a) The amount of garages allocated which are set too far back and could allow an offender to enter these areas undetected (pages 1-2, para A refers).**
- b) The number of flying freeholds (undercrofts) incorporated which are proven generators of crime (page 2, para, B refers).**
- c) To view the internal layout of proposed properties to ascertain if there will be active rooms to look onto vehicle parking spaces at the side of properties (page 2, para, D refers).**
- d) To ascertain the exact details of all the perimeter areas, with those having hedges preferably comprising defensive vegetation (page 2, para E refers).**
- e) Clarification how the western perimeter of the development will comprise, particularly around the western side of the attenuation basin where it runs alongside the main Norwich to London railway line (page 2, para F refers).**

Building to the physical security of Secured by Design, will reduce the potential for burglary by 50% to 75% and achieve ADQ. I would encourage the applicants to seek Secured by Design certification.

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

I hope the planners will adopt Secure By Design standards and apply the security principals stated.

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