

**From:** Infrastructure Team (Babergh Mid Suffolk)  
**Sent:** 19 January 2017 13:14  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 5007/16

Community Infrastructure Levy (CIL) is assessed upon grant of Reserve Matters permission. Residential development in this area is subject to the CIL Strategic Site rate of £0. This means that CIL forms will need to be submitted, but the CIL Charge will be £0. A s106 agreement will be required to secure Affordable Housing and any infrastructure that is necessitated by this development.

Kind regards,

**Angharad Firth**  
Infrastructure Support Officer  
Infrastructure Team  
**Babergh and Mid Suffolk District Council – Working Together**

Mob: 07710854584  
Tel: 01449 724978

**\*\*\* Community Infrastructure Levy (CIL) charging started in Mid Suffolk and Babergh on 11th April 2016. See our websites for the latest information here: [CIL in Babergh](#) and [CIL in Mid Suffolk](#) \*\*\*\***

Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given within this email.

**From:** [planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk) [<mailto:planningadmin@midsuffolk.gov.uk>]  
**Sent:** 19 January 2017 11:41  
**To:** Infrastructure Team (Babergh Mid Suffolk)  
**Subject:** Consultation on Planning Application 5007/16

Correspondence from MSDC Planning Services.

Location: Land North of Chilton Leys, Chilton Leys, Stowmarket

Proposal: Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved).

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

**From:** Iain Farquharson  
**Sent:** 24 January 2017 14:57  
**To:** Planning Admin  
**Subject:** M3 189125: Consultation on Planning Application 5007/16

5007/16 | Application for Outline Planning Permission for up to 600 new dwellings

Dear Sir/Madam

We have reviewed the documents supplied for this outline application in particular the Energy Statement December 2016 which a progression of a document previously commented upon and subsequently improved by the applicants agent.

We recommend the following condition is included in any permission.  
*Before any development is commenced a Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation including details on environmentally friendly materials, construction techniques and reduced use of potable water. This strategy to demonstrate the 14% CO2 reduction offered in the Energy Statement December 2016 by Energist.*

*This document shall be submitted to, and approved in writing by, the Local Planning Authority.*

Iain Farquharson

Environmental Management Officer  
Babergh Mid Suffolk Council

☎ 01449 724878  
✉ [iain.farquharson@baberghmidsuffolk.gov.uk](mailto:iain.farquharson@baberghmidsuffolk.gov.uk)

**From:** [planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk) [<mailto:planningadmin@midsuffolk.gov.uk>]  
**Sent:** 19 January 2017 11:40  
**To:** Environmental Health  
**Subject:** Consultation on Planning Application 5007/16

Correspondence from MSDC Planning Services.

Location: Land North of Chilton Leys, Chilton Leys, Stowmarket

Proposal: Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved).

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

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

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

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

Our Ref: 2016\_5007  
Date: 27 January 2016

For the Attention of John Pateman-Gee

Dear Mr Isbell

**Planning Application 5007/16 – Land north of Chilton Leys, Stowmarket: Archaeology**

This site lies in an area of known archaeology recorded on the County Historic Environment Record. Fieldwalking, metal detecting, trenched archaeological evaluation and subsequent archaeological excavation across much of the Phase 1 development area has revealed extensive and significant occupation remains from multiple periods. Finds have included Prehistoric pits, Roman settlement and industrial features including kilns and Saxon burials and occupation remains (HGH 052, 055 and 057). A first phase of evaluation within the proposed development area itself, consisting of geophysical survey and trial trenched evaluation, has identified remains of prehistoric, Roman and medieval date (ONS 012). As a result, the proposal will have a direct impact upon known archaeological remains and there is also high potential for the discovery of further below-ground heritage assets of archaeological importance within this area. 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 in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

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

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

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

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

**REASON:**

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

**INFORMATIVE:**

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, a second phase of archaeological evaluation will be required to fully define areas of archaeological interest within the site. Decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of 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,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team

**From:** Ipswich, Planning [mailto:planning.ipswich@environment-agency.gov.uk]  
**Sent:** 30 January 2017 14:36  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 5007/16

Good afternoon John, this proposal has been screened out and we will not be providing a formal response. However, we feel that you should know that Stowmarket Sewage Treatment Works is already within 50-houses-worth of capacity at current flows, agreements with Anglia Water notwithstanding. Unless AW can pull something out of the hat before these are connected, this will result in a breach in permit.

Kind regards

Graham Steel  
Sustainable Places Planning Advisor  
East Anglia area East  
Internal 58389  
External 02 03 02 58389  
Mobile 07845 875238  
[graham.steel@environment-agency.gov.uk](mailto:graham.steel@environment-agency.gov.uk)  
<https://www.gov.uk/government/organisations/environment-agency>  
<https://www.gov.uk/flood-risk-assessment-for-planning-applications>  
<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>  
Iceni House, Cobham Road, Ipswich, IP3 9JD



National Customer Contact Centre: 03708 506506  
*(Weekday Daytime calls may cost 8p plus up to 6p per minute from BT Weekend Unlimited. Mobile and other providers' charges may vary.)*



**From:** [planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk) [mailto:planningadmin@midsuffolk.gov.uk]  
**Sent:** 19 January 2017 11:40  
**To:** Ipswich, Planning <[planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)>  
**Subject:** Consultation on Planning Application 5007/16

Correspondence from MSDC Planning Services.

Location: Land North of Chilton Leys, Chilton Leys, Stowmarket

**From:** Nathan Pittam  
**Sent:** 26 January 2017 10:31  
**To:** Planning Admin  
**Subject:** 5007/16/OUT. EH - Land Contamination.

**M3 : 189122**  
**5007/16/OUT. EH - Land Contamination.**  
**Land North of Chilton Leys, Bury Road, STOWMARKET, Suffolk.**  
**Application for Outline Planning Permission for up to 600 new dwellings**  
**together with a local centre, sports pavilion, open space and recreation**  
**facilities. (All Matters Reserved).**

Many thanks for your request for comments in relation to the above application. I note that the applicant has supposedly submitted a Phase I and II report by Geosphere Environmental. However, I can only find the appendices of this report on the planning portal. Would it be possible for you to look and see if the full report is available on idox but hasn't been made available to view on the planning portal.

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer  
**Babergh and Mid Suffolk District Councils – Working Together**  
t: 01449 724715  
m: 07769 566988  
e: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** RM Floods Planning  
**Sent:** 30 January 2017 11:48  
**To:** Planning Admin  
**Cc:** John Pateman-Gee; Giles@wlma.org.uk  
**Subject:** 2017-01-27 JS Reply Land North of Chilton Leys, Chilton Leys, Stowmarket Ref 5007/16

Suffolk County Council, Flood and Water Management can make the following initial comment to this application.

Infiltration has been shown not to be viable due to the heavy clay soils therefore a controlled discharge to a watercourse is proposed, this is in line with NPPG hierarchy.

However, the rate given of 3.2l/s/ha is too great due to the calculation not using correct SAAR(mm) and soil type. Using Microdrainage we would calculate that the rate of 2.84l/s/ha is use, thus giving a total discharge of 39.8l/s for the 14ha site.

We also note that they are proposing side slopes as 1 in 3 for the attenuation basins, but the side slopes should be no greater than a 1 in 4. There is also an existing open channel (ditch) running through the middle of the site, could this existing water feature be utilised to manage the surface water from this part of the site as an above ground system. This could then be mirrored for the rest of the proposed conveyance routes through the site.

I also concerned that the applicant does not have the riparian rights to discharge the surface water into the watercourse which is feeds into the River Gipping, which is an East Suffolk IDB catchment No 186. The East Suffolk IDB should also be consulted on this application as a surface water developers contribution maybe applicable

We would therefore like to see a revised calculation for the surface water drainage system and a revised indicative surface water drainage system layout using above ground SuDs system.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

**From:** [planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk) [mailto:[planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk)]  
**Sent:** 19 January 2017 11:40  
**To:** RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
**Subject:** Consultation on Planning Application 5007/16

Correspondence from MSDC Planning Services.

Location: Land North of Chilton Leys, Chilton Leys, Stowmarket

# **Consultee Comments for application 5007/16**

## **Application Summary**

Application Number: 5007/16

Address: Land North of Chilton Leys, Chilton Leys, Stowmarket

Proposal: Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved).

Case Officer: John Pateman-Gee

## **Consultee Details**

Name: Miss Carmel Driscoll

Address: Mid Suffolk District Council, 131 High Street, Needham Market, Ipswich IP6 8DL

Email: [carmel.driscoll@baberghmidsuffolk.gov.uk](mailto:carmel.driscoll@baberghmidsuffolk.gov.uk)

On Behalf Of: MSDC - Planning Enforcement (retention applications and existing enf case)

## **Comments**

There are no current or previous enforcement cases relating to the proposal. No further comments.



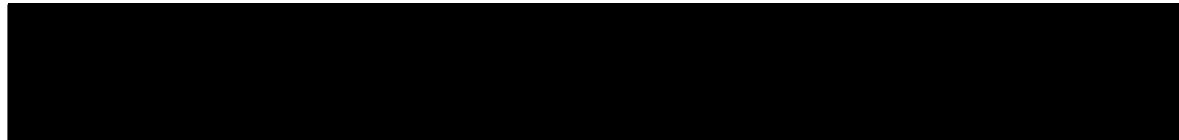
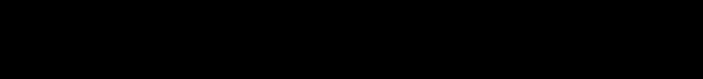
**From:** Michelle Marshall [mailto:Michellelm@stowmarket.org]  
**Sent:** 02 February 2017 11:30  
**To:** BMSDC Planning Area Team Yellow; BMSDC Planning Area Team Yellow  
**Subject:** Planning applications

Please see below for comments from Stowmarket Town Council in respect of recent planning applications.



**5007/16**

No objection be raised to the grant of planning consent, subject to the successful negotiation with the Planning Authority to ensure the timely implementation of suitable and sufficient infrastructure in order to adequately support increases in dwellings and residents within the local community.



Kind regards,  
Michelle

**Michelle Marshall**  
**Deputy Town Clerk**

**Stowmarket Town Council**  
**Milton House – Milton Road South – Stowmarket – Suffolk – IP14 1EZ**  
**01449 612060 – [www.stowmarket.org](http://www.stowmarket.org)**



## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	5007/16 Land north of Chilton Leys, Chilton Leys, Stowmarket	
<b>2</b>	<b>Date of Response</b>	07/02/2017	
<b>3</b>	<b>Responding Officer</b>	Name:	Rebecca Styles
		Job Title:	Heritage Officer
		Responding on behalf of...	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (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.	<ol style="list-style-type: none"> <li>1. The Heritage Team considers that the proposal would have an effect on the setting of heritage assets located around the application site. With only an indicative site layout, it is difficult to quantify or assess the level of harm the proposed development may cause. The proposal for up to 600 dwellinghouses will have an effect on the setting of the GII listed Starhouse farmstead and Stow Lodge Hospital, and will likely have a detrimental effect on the setting of the isolated GII Shepherds Farm.</li> <li>2. If it is considered that the harm of this proposal on heritage assets would be outweighed by public benefit, a reserved matters application should seek to minimise the impact of the development on heritage assets.</li> </ol>	
<b>5</b>	<b>Discussion</b> 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>This application seeks outline planning permission for the erection of up to 600 dwellings with local sports centre and recreational facilities to the NW of central Stowmarket, towards Onehouse.</p> <p>The application site is a large area of agricultural land linked by public footpaths. There are a number of listed and historic buildings located around the application site, as identified by the applicant's Heritage Impact Assessment submitted with this application.</p> <p>The Heritage Impact Assessment submitted with this application is, unfortunately, lacking. Paragraph 2.5 of the submitted report states, 'recent appeal decisions have clarified the interpretation of existing guidance, establishing that the ability to see a proposed development (either from the heritage asset itself or from within its setting) should not be equated with harm to the significance of the asset'. Section 4 then goes on to list a number of heritage assets which are 'capable of being affected by the proposed development', and then halts discussion or assessment of some of the assets identified (Stow Lodge Hospital, Starhouse Farmhouse and Barn 10m west of Starhouse Farmhouse, Elder Cottage, Leacroft Rose Cottage, Chilton Court, Chilton Hall and Chilton Hall Barn), due to the lack of visibility from the</p>	

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.

	<p>application site to the above historic assets. This is surely an oversight of the subject raised in paragraph 2.5 of the applicant's Heritage Impact Assessment – despite the application site being bounded from heritage assets by vegetation or distance, this does not mean that the proposed development will have no effect on their setting.</p> <p>As all matters except access are reserved, there is very little information available with this application to assess the level of harm the proposed development would cause. Harm could arise from scale, massing, design and the palette of materials proposed within the setting of the listed buildings around the site.</p> <p>Notwithstanding the above, from the proposed layout plans submitted with this application, the Heritage team can offer the following comments:</p> <p><u>Stow Lodge Hospital</u>  Stow Lodge Hospital is a Grade II listed former workhouse and hospital, now converted into residential use, located to the SE of the application site. Stow Lodge has an impressive red brick façade, slated roof with detailed fenestration scheme. Stow Lodge has in more recent years been developed to the rear; however the principal elevation, clearly designed to be the most impressive, has avoided any inappropriate alterations.</p> <p>The proposed layout plan indicates that the development would be located NW of the listed building, and would be screened from Stow Lodge Hospital by a number of existing buildings associated with the current use of the site.</p> <p>The isolated nature of Stow Lodge Hospital would, however, be eroded. As the building was originally erected as a workhouse, Stow Lodge would have been located deliberately away from the main population of the town. The development of this land with intensive housing development would therefore further diminish the intended isolation of the hospital.</p> <p>The proposal would not affect the principal façade of Stow Lodge which does still sit in relatively large grounds. Stow Lodge would retain its impressive and dominating position, despite the development to the NW of the site. Whilst this proposal will have an effect on the setting of Stow Lodge, it is, on balance, not considered that this would be a harmful one.</p>
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	<p><u>Starhouse Farmhouse and the barn 10m west of Starhouse Farmhouse</u>  Both Grade II listed, these buildings form part of the historic Starhouse farmstead. The main farmhouse is GII listed, 15th timber framed, thatched dwelling, whilst the GII listed barn is C18th timber framed. It was once thatched, but now utilises a corrugated iron roof. The Starhouse farm complex is screened from Starhouse Lane and the application site by mature, non-native vegetation.</p> <p>The proposed layout plan highlights the area opposite the Starhouse farmstead (east) as a recreational area, with sports pitches and sports pavilion. The proposed development would therefore retain a relatively open character opposite the listed buildings.</p> <p>Drawing CSA/2833/144 does, however, illustrate that the sports pitch would be enclosed with 3m wire mesh fencing and 4 no. floodlights, accompanied by an asphalt carpark. These features could generate a particularly suburban feel to the site, which would dilute the rural character of the historic farmstead opposite. It is noted that a landscaping scheme would be proposed along the western boundary of the site. However, it is likely that the impact of this development on the setting of the GII listed farmstead would not be overcome by screening alone. If approved, these points could be addressed with the submission of the reserved matters application, seeking to minimise the impact of this modern development on the heritage assets to the east by revision of surface materials for the carpark, use of lighting, and style of perimeter fencing for the sports pitch.</p> <p><u>Shepherds Farmhouse</u>  Shepherds Farmhouse is a C15th Grade II listed open hall house, located to the NE of the application site. Presently, the farmhouse sits in an isolated location on relatively high land, with land falling away to the NW towards the valley.</p> <p>Although development associated with Phase 1 of this application has taken place to the SE of Shepherds Farmhouse, an assessment of cumulative impact still needs to be considered for any proposal to accord with NPPF policies, and as per Historic England's guidance note on the setting of heritage assets. Although Phase 1 has commenced and erodes the rural nature of the listed farmhouse, the isolated setting of Shepherds Farmhouse will likely be obliterated by the proposed development, and would likely have a detrimental setting on the historic</p>
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		<p>asset.</p> <p>The illustrative layout plan annotates the existing public footpaths will be surfaced with asphalt to a width of 3m. As previously identified, this is a particularly suburban surface material and would be inappropriate for an open, countryside setting. The surfacing arrangements could affect the setting of Shepherds Farmhouse, and as such a material more organic in appearance, such as resin bound gravel, would be more appropriate to the rural setting of the site.</p> <p>If approved, and reserved matters application submitted, the impact of this harm could be controlled through the provision of low density, single or 1.5 storey development within the setting of Shepherds Farmhouse, with, as shown on the illustrative layout plan, areas of open space serving the attenuation pond to the north.</p> <p>This assessment has been made based on the information submitted with this application and indicative site plans. The assessment of possible level of harm is difficult to quantify, due to the limited information submitted. The proposal will affect the setting of heritage assets, and is likely to cause detrimental harm to the setting of Shepherds Farm. However, if approved, a reserved matters application should address the issues raised, in order to seek to reduce the impact of the proposal on the setting of heritage assets.</p>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<p><b>Recommended conditions</b></p>	

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.

# **Consultee Comments for application 5007/16**

## **Application Summary**

Application Number: 5007/16

Address: Land North of Chilton Leys, Chilton Leys, Stowmarket

Proposal: Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved).

Case Officer: John Pateman-Gee

## **Consultee Details**

Name: Mrs Peggy Fuller

Address: 86 Forest Road, Onehouse, Stowmarket IP14 3HJ

Email: peggy.onehousepc@btinternet.com

On Behalf Of: Onehouse Parish Clerk

## **Comments**

Councillors object to the proposals.

There is a lack of definition of a strategic gap between Onehouse and Stowmarket. The development is an encroachment on the village of Onehouse. Road safety will be compromised with the bus entrance on the bend of Forest Road and Starhouse Lane. It is imperative that the 30mph limit is extended from 22 Forrest Road and along the entirety of Starhouse Lane. Both Forest Road and Starhouse Lane are unsuitable for the traffic this development will generate. The on site road and bus route conflicts with Bridleway 47 to the detriment of cyclist and pedestrian safety. There is nothing in the proposal to support the strain on health, education and road infrastructure and improvements to all these must be in place before development takes place. The development will have a detrimental effect on the setting of various Listed Building in the vicinity, in particular Stow Lodge and Starhouse Farm.

The development is a loss of good quality agricultural land.

There will be a detrimental effect on the VIOS of the Paupers Graves and this must be protected.

There will be a loss of open space which contributes to the character and appearance and which is used for recreation.

Concerns were expressed regarding the impact on gas and water supply to the village of Onehouse and assurance is sought that this has been factored in. The current sewage system is already struggling to cope and it must be ensured that there is sufficient capacity for any further housing.

Contrary to policies T10, CL11, HB1, GP1, H4, H13, H16, Cor6.



## **Developments Affecting Trunk Roads and Special Roads**

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

#### **Formal Recommendation to an Application for Planning Permission**

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

**To:** Mid Suffolk District Council

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

**Council's Reference:** 5007/16

Referring to the planning application referenced above, dated 20 January 2017, application for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities, Land North of Chilton Leys, Chilton Leys, Stowmarket, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

**Signature:** 

**Date:** 8 February 2017

**Name:** David Abbott

**Position:** Asset Manager

**Highways England:**

Woodlands, Manton Lane

Bedford MK41 7LW

david.abbott@highwaysengland.co.uk



**From:** RM PROW Planning  
**Sent:** 08 February 2017 11:10  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 5007/16

**Our Ref:** W297/035/ROW996/16

**For The Attention of:** John Pateman-Gee

**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.

There are a number of public rights of way affected by this development. A full and comprehensive response is to follow which will include s106 requirements.

Regards

**Jackie Gillis**  
**Green Access Officer**  
**Access Development Team**  
Rights of Way and Access  
Resource Management, Suffolk County Council  
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

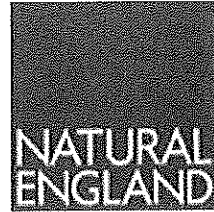
 <http://publicrightsofway.onesuffolk.net/> | **Report A Public Right of Way Problem Here**

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

**From:** [planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk) [<mailto:planningadmin@midsuffolk.gov.uk>]  
**Sent:** 19 January 2017 11:41  
**To:** RM PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>  
**Subject:** Consultation on Planning Application 5007/16

Correspondence from MSDC Planning Services.

Date: 09 February 2017  
Our ref: 206572  
Your ref: 5007/16



John Pateman-Gee  
Mid Suffolk District Council

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

T 0300 060 3900

**BY EMAIL ONLY**

Dear Mr Pateman-Gee

**Planning consultation:** Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved)

**Location:** Land North of Chilton Leys, Chilton Leys, Stowmarket

Thank you for your consultation on the above dated 19 January 2017 which was received by Natural England the same day.

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.

**Natural England does not consider that this application poses any likely or significant risk to those features of the natural environment<sup>1</sup> for which we would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.**

The lack of case-specific comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of this site in the decision making process.

In particular, we would expect the LPA to assess and consider the possible impacts resulting from this proposal on the following when determining this application:

***Protected species***

Where there is a reasonable likelihood of a protected species being present and affected by the proposed development, the LPA should request survey information from the applicant before determining the application (Paragraph 99 Circular 06/05)<sup>2</sup>.

Natural England has produced standing advice, which is available on our website [Natural England Standing Advice](#) to help local planning authorities to better understand the impact of particular

<sup>1</sup> Cases which might affect a SSSI, Natura 2000 site, National Park, Area of Outstanding Natural Beauty or a large population of a protected species and/or cases or generic issues which affect a large suite of sites or may set a precedent and thereby affect a significant quantity of habitat across the country

<sup>2</sup> Paragraph 98 and 99 of ODPM Circular 06/2005.

developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, local planning authorities should undertake further consultation with Natural England.

### **Soils and Land Quality**

Although we consider that this proposal falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, Natural England draws your Authority's attention to the following land quality and soil considerations:

1. Based on the information provided with the planning application, it appears that the proposed development comprises approximately 30 ha of agricultural land, some of which may be classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).
2. Government policy is set out in paragraph 112 of the National Planning Policy Framework which states that:

*'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'*

3. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.
4. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site. Further guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks) and we recommend that this is followed.

### **Local wildlife sites**

If the proposal site is on or adjacent to a local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application.

### **Biodiversity enhancements**

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of integrated bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

### **Landscape enhancements**

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring

benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

This concludes Natural England's advice which I hope you will find helpful.

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 relating to the specific advice in this letter only please contact Jack Haynes using the details given below . For any new consultations, or to provide further information on this consultation, please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

**Jack Haynes**

Land Use Operations Norfolk & Suffolk Team

Email: [jack.haynes@naturalengland.org.uk](mailto:jack.haynes@naturalengland.org.uk)

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Our Ref: NHSE/MIDS/16/5007/KH

Your Ref: 5007/16

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

09 February 2017

Dear Sir / Madam

**Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved).  
(Phase 2) Land North of Chilton Leys, Chilton Leys, Stowmarket.**

### **1.0 Introduction**

- 1.1 Thank you for consulting NHS England on the above outline planning application. This response follows advice provided prior to formal application, dated 20 June 2016.
- 1.2 I refer to the above planning application and advise that, further to 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) (NHS England), incorporating Ipswich and East Suffolk Clinical Commissioning Group (CCG).

### **2.0 Existing Healthcare Position Proximate to the Planning Application Site**

- 2.1 The proposed development is likely to have an impact on the services of 2 GP practices operating within the vicinity of the application site. The GP Practices do not have capacity for the additional growth resulting from this development.
- 2.2 The proposed development will be likely to have an impact on 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.

### **3.0 Review of Planning Application**

- 3.1 The planning application does not appear to include a Health Impact Assessment (HIA) however, the planning statement recognises that a capital contribution may be required to mitigate the primary healthcare impacts arising from the proposed development.
- 3.2 NHS England notes that this proposed development is allocated as a strategic site and therefore CIL funding will not be obtained. Therefore, any mitigation required will need to be secured through a Section 106 planning obligation.
- 3.3 A Healthcare Impact Assessment (HIA) has been prepared by NHS England to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

#### 4.0 Assessment of Development Impact on Existing Healthcare Provision

- 4.1 The existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed development. The proposed development could generate approximately 1,440 residents and subsequently increase demand upon existing constrained services.
- 4.2 The primary healthcare services within a 2km radius of the proposed development and the current capacity position is shown in Table 1.

**Table 1: Summary of position for primary healthcare services within a 2km radius (or closest to) the proposed development**

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
Stow Health	17,389	1000.00	14,583	-192.39
Combs Ford Surgery	8,450	378.50	5,520	-200.93
<b>Total</b>	<b>25,839</b>	<b>1,378.50</b>	<b>20,103</b>	<b>-393.32</b>

**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 120m<sup>2</sup> per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01; facilities for Primary and Community Care Services"
4. Based on existing weighted list size

- 4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

#### 5.0 Healthcare Needs Arising From the Proposed Development

- 5.1 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.
- 5.2 The development would give rise to a need for improvements to capacity, in line with emerging CCG Estates Strategy. This would not be by way of site specific infrastructure, but in the form of significant reconfiguration internally and Information Technology (IT) infrastructure at Stow Health; a proportion of the cost of which would need to be met by the developer. Monies are required to improve capacity at existing facility Stow Health, to further develop it as a sustainable primary care hub; to achieve greater efficiency and consequently increase capacity for patients/ residents in the area, including expanding the number of community services, thus reducing the need for patients to attend hospital.
- 5.3 Table 2 below provides the Capital Cost Calculation of additional primary healthcare services arising from the development proposal.

**Table 2: Capital Cost calculation of additional primary healthcare services arising from the development proposal**

Premises	Additional Population Growth (600 dwellings) <sub>5</sub>	Additional floorspace required to meet growth (m <sup>2</sup> ) <sup>6</sup>	Spare Capacity (NIA) <sup>7</sup>	Capital required to create additional floor space (£)

Stow Health	1,440	98.74	-192.39	227,102
<b>Total</b>	<b>1,440</b>	<b>98.74</b>	<b>-192.39</b>	<b>£227,102</b>

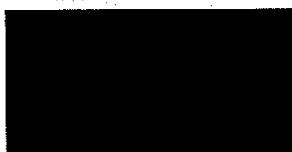
**Notes:**

5. Calculated using the Mid Suffolk District average household size of 2.4 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
  6. Based on 120m<sup>2</sup> per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
  7. Existing capacity within premises as shown in Table 1.
  8. Based on standard m<sup>2</sup> cost multiplier for primary healthcare in the East Anglia Region from the BCIS Public Sector Q3 2015 price & cost Index, adjusted for professional fees, fit out and contingencies budget (£2,300/m<sup>2</sup>), rounded to nearest £100.
- 5.4 A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be **£227,102**. Payment should be made before the development commences.
- 5.5 NHS England notes that this proposed development is allocated as a strategic site and therefore CIL funding will not be obtained. NHS England therefore requests that this sum be secured in the form of a section 106 obligation linked to any grant of planning permission.

**6.0 Conclusions**

- 6.1 In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- 6.2 The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.
- 6.3 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. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 6.4 The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development.
- 6.5 NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.
- 6.6 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



**Kerry Harding**  
Estates Advisor



# SUFFOLK CONSTABULARY

Secured by Design



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

**Planning Application (5007/16)**

**SITE: 600 Dwellings at Land North of Chilton Leys, Stowmarket**

**Applicant: Taylor Wimpey through James Bailey, Boyer 15 De Grey Square, Colchester**

**Planning Officer: Mr Pateman Gee**

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 Pateman Gee

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 600 dwellings on land north of Chilton Leys, Stowmarket.

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

At this stage I feel I do not have the level of detail I require to make specific comments in relation to 'designing out crime' for this outline application. However, I recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation. Further information can be found at [www.securedbydesign.com](http://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>

My specific observations for this development are that I commend the developers for the overall open layout of the design.

I note there are already a number of public footpaths around the perimeter of this development and I welcome that the developers have stated that they will tarmac a number of these footpaths. I trust there will be no footpaths to the rear of any of these properties, as it is a well-known fact that such paths are generators for crime.

I would like further details on the designs of these footpaths as to how they will be lit and their width.

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I would like to know more detail as to how the perimeter will be secured on the northern and western sides bordering the open fields.

I happily note the developers state that the design proposals will mean that vehicles will be overlooked from dwellings to allow natural surveillance. I also note the developers state vehicles will not dominate the street scene or cause any inconvenience, with garages, on street parking and forecourts in mind, however, I would like to know more details about such proposals.

I would recommend the rear of each property comprises 1.8m close boarded fencing, or at the very least 1.5m close boarded fencing accompanied by further 300 cm high trellis.

I would also like to see 1 metre metal hooped railings around the communal areas.

I would strongly recommend that the new primary school is designed to the Home Office 2010 Designing Schools for Safety and Security booklet and the Secure By Design (SBD) New Schools 2014 booklet at [www.securedbydesign.com/wp-content/uploads/2015/09/New-Schools-2014.pdf](http://www.securedbydesign.com/wp-content/uploads/2015/09/New-Schools-2014.pdf)

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

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

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

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

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

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

## **2.0 REFERRALS**

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

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

**2.13** One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

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

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

Landscaping 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.

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

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

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

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

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

- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

### 3.0 **GENERAL COMMENTS ON PROPOSED PLAN**

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

3.1 I would like to know how the perimeters will be secured for the outer perimeter of the site, especially at the northern and western sides bordering the open fields.

3.2 **There are five main reasons for providing a perimeter boundary fence:**

- To **mark a boundary** to make it obvious what is private and public property.
- Provide safety** for employers and employees.
- Prevent casual intrusion** by trespassers.
- Prevent casual intrusion** onto the site by criminals.
- Reduce the wholesale removal** of property from the site by thieves.

3.3 I would like more information on the footpaths in particular how they will be lit and their width dimensions.

3.4 Routes for pedestrians, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime along with Anti-Social Behaviour. Where a suggested footpath is unavoidable, such as along a right of way, designers should consider making the footpath a focus of the development and ensure that they are straight as possible, preferably at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles with low growing and regularly maintained vegetation on either side. If possible it would assist for that area to also be well lit. (SBD 2016, pages 14-17, at Paras 8.1-8.19).

3.5 I would like to know that there will be no footpaths to the rear of any of these properties, as it is a well-known fact that such paths are generators for crime.

3.6 I would like to know more about the developers proposals to cater for secure parking for vehicles.

3.7 I strongly recommend that the new primary school is designed to the Home Office 2010 Designing Schools for Safety and Security booklet and the Secure By Design (SBD) New Schools 2014 booklet at [www.securedbydesign.com/wp-content/uploads/2015/09/New-Schools-2014.pdf](http://www.securedbydesign.com/wp-content/uploads/2015/09/New-Schools-2014.pdf)

3.8 I would like more information on the perimeters for each property and ask that all the rear of properties are secured with 1.8m close boarded fencing, or at least 1.5m close boarded fencing with additional further 300cm high trellis.

3.9 I would like to know more about how the developers will cater for surveillance from residential properties of their vehicles. I would like to see gable end windows that look onto public spaces, to provide natural surveillance, especially for the communal space areas too.

3.10 Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.

3.11 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.

- 3.12 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.
- 3.13 All litter bins should be of a fire retardant material.
- 3.14 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.
- 3.15 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 3.16 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).

#### 4.0 **CONCLUSION**

- 4.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 4.2 As of the 1<sup>st</sup> June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards [http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured\\_by\\_Design\\_Homes\\_2016\\_V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf)
- 4.3 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/>
- 4.4 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.

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.

#### **5.0 FINAL CONCLUSION**

**As I do not have sufficient information on the proposed planning application, I can neither approve, nor object to this proposed plan.**

**I hope the planners will adopt Secure By Design standards and apply for Secure by Design National Building Approval membership.**

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

Yours sincerely

A large black rectangular redaction box covering the signature area.

Phil Kemp

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



## **Planning Applications – Suggested Informative Statements and Conditions Report**

AW Reference: 00019828  
Local Planning Authority: Mid Suffolk District  
Site: Land North of Chilton Leys, Stowmarket  
Proposal: Application for Outline Planning Permission for up to 600 new dwellings together with a local centre, sports pavilion, open space and recreation facilities. (All Matters Reserved).  
Planning Application: 5007/16

**Prepared by: Sandra Olim**

**Date: 01 March 2017**

If you would like to discuss any of the points in this document please contact me on 0345 0265 458 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

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## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

- 2.1 The foul drainage from this development is in the catchment of Stowmarket Water Recycling Centre that will have available capacity for these flows.

### **Section 3 – Foul Sewerage Network**

- 3.1 Development will lead to an unacceptable risk of flooding downstream. However a development impact assessment has been prepared in consultation with Anglian Water to determine a feasible mitigation solution.

We will request a condition requiring compliance with the agreed drainage strategy

### **Section 4 – Surface Water Disposal**

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### **Section 5 – Trade Effluent**

- 5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.

*"An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.*

*Anglian Water recommends that petrol / oil interceptors be fitted in all car*

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*parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.*

*Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."*

## **Section 6 – Suggested Planning Conditions**

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

### **Foul Sewerage Network (Section 3)**

#### **CONDITION**

*No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.*

#### **REASON**

*To prevent environmental and amenity problems arising from flooding.*

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Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' which sets out the agreed approach to planning obligations with further information on education and other infrastructure matters in the topic papers.

Mid Suffolk District Council has adopted their Community Infrastructure Levy Charging Schedule which was implemented on 11 April 2016.

The current Mid Suffolk 123 List, dated November 2014, 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

However this site is identified as a strategic allocation which is zero rated for CIL and the mitigation required, ensuring the delivery of sustainable development as set out in the NPPF, will continue to be dealt with via planning obligations.

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

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

SCO would anticipate the following **minimum** pupil yields from a development of 600 residential units, namely:

- a. Primary school age range, 5-11: 150 pupils. Cost per place is £16,429 (2016/17 costs). This is based on the estimated cost of £6.9m to build a 420 place primary school.
- b. Secondary school age range, 11-16: 105 pupils. Cost per place is £18,355 (2016/17 costs).
- c. Secondary school age range, 16+: 21 pupils. Costs per place is £19,907 (2016/17 costs).

At the primary school level the agreed strategy is to deliver within the Chilton Leys strategic allocation a new on-site primary school with an integrated early years facility. Land for the new school has already been secured via an option agreement. The proportionate contribution to fund the delivery of the new primary school is 150 places x £16,429 per place = £2,464,350 (2016/17 costs).

The local catchment secondary school is Stowmarket High School.

Based on existing forecasts SCC will have no surplus places available at the catchment secondary school to accommodate any of the pupils arising from this scheme. Based on this current position SCC will require contributions towards providing additional education facilities for all of the 126 secondary age pupils arising, at a total cost of £2,345,322 (2016/17 costs).

**The total education contribution is £4,809,672 (2016/17 costs).**

The scale of contributions is based on the actual cost of building the new primary school and the cost multipliers for the capital cost of providing a secondary school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2016/17 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times. Once the Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the Section 106 agreement until such time as the education contribution is due. SCC has a 10 year period from completion of the development to spend the contribution on education provision.

Clearly, local circumstances may change over time and I would draw your attention to paragraph 13 where this information is time-limited to 6 months from the date of this letter.

- 2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds. From these development proposals SCC anticipates up to 60 pre-school pupils.

In view of the strategic nature of this allocation, the intention is to deliver on-site early years facility co-located with the primary school at an estimated build cost of £650,000 or £10,833 per place. On this basis the contribution sought from the 600 dwellings is £650,000 (2016/17 costs). This contribution will be BCIS index linked.

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

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

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
  - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
  - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
  - d. Routes to children's play spaces are safe and accessible for all children and young people.
4. **Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Luke Barber and Christopher Fish.

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

5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A contribution of £216 per dwelling is sought i.e. £129,600 (BCIS index linked), which will be spent on enhancing provision at Stowmarket Library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste

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

The waste disposal facilities topic paper sets out the detailed approach to how contributions are calculated. A contribution of £51 per dwelling is sought i.e. £30,600 (BCIS index linked), which will be spent on enhancing provision in Stowmarket.

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

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the local planning authority's housing team to identify local housing needs.
8. **Archaeology.** Please refer to the letter dated 27 January 2017 from Rachael Abraham.
9. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

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

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

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

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

**10. 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.

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

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

**12. Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs associated with work on a S106A, whether or not the matter proceeds to completion.

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

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 & 123(3) Regulations.

Yours sincerely,

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

cc Iain Maxwell, Suffolk County Council  
Luke Barber/Christopher Fish, Suffolk County Council  
Floods Planning, Suffolk County Council