



Consultation Response Pro forma

1	Application Number	M/0460/17/OUT	
2	Date of Response	24.4.2017	
3	Responding Officer	Name:	Julie Abbey-Taylor
		Job Title:	Professional Lead – Housing Enabling
		Responding on behalf of...	Strategic Housing service
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	The development proposes 40 new dwellings. Recommendation – No objection	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	Up to 35% affordable housing should be provided as part of this application which equates to 14 dwellings. Of the 14, 9 should be for affordable rent and 5 should be for low costs shared ownership as detailed below: <u>Rented = 9 dwellings:</u> - <ul style="list-style-type: none"> • 4 x 1-bedroom 2-person flat @ 50 square metres • 1 x 2 bedroom 3 person bungalow @ 61 sqm • 3 x 2-bedroom 4-person houses at 79 square metres • 1 x 3 bed 5 person houses @ 93 sqm <u>Shared ownership = 5 dwellings:</u> - <ul style="list-style-type: none"> • 4 x 2 bed 4 person houses @ 79 sqm • 1 x 3 bed 5 person house @ 93 sqm <p>The above mix is requested and to be included in the S106 agreement.</p>	
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are		

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.

	proportionate	
7	Recommended conditions	The affordable housing mix as above to be included in the S106 agreement in the event the application is approved by Committee.

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

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 24 February 2017 15:20
To: Planning Admin
Subject: RE: Consultation on Planning Application 0460/17

CIL is chargeable on residential development in this area at £115m² which is subject to indexation. CIL is calculated upon grant of Reserve Matters. Affordable Housing provided by this site may be eligible for Relief/Exemption should it meet the required criteria as set out within the CIL Regulations 2010 (as amended).

Kind Regards,

Nicola

Nicola Parrish
Infrastructure Officer

Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724977
Mob: 07720899821

Your Ref: MS/0460/17
Our Ref: 570\CON\2152\17
Date: 20th June 2017
Highways Enquiries to: martin.egan@suffolk.gov.uk



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

Email: planningadmin@babberghmidsuffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Ipswich
Suffolk
IP6 8DL

For the Attention of: Stephen Burgess

Dear Sir,

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/0460/17

PROPOSAL: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

LOCATION: Land At, Back Hills, Botesdale, IP22 1DW

ROAD CLASS:

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

1 AL 3

Condition: The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No. 253/2015/02/P1 as submitted; and with an entrance width of 5.5 metres and made available for use prior to any dwelling being first occupied. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

2 ER 1

Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

3 ER 2

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

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

4.

Condition: Before any dwelling is first occupied the existing public footpath (number 6 Botesdale) which runs through the application site shall be widened and surfaced in accordance with details which shall first have been submitted to and approved in writing by the Local Planning Authority.

Reason: To enable pedestrians from the development to safely access Diss Road / The Street on a properly surfaced footpath of sufficient width.

5. P 2

Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including 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 ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

6. V 1

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 253/2015/02/P1 as submitted with an X dimension of 2.4 metres and a Y dimension of 133 metres 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.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action.

7 NOTE 02

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. The County Council's Central Area Manager must be contacted on Telephone: 01473 341414. Further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

8 NOTE 07

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.

Yours faithfully

Mr Martin Egan
Highways Development Management Engineer
Strategic Development – Resource Management

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
Web: <http://www.suffolk.gov.uk>

Our Ref: 2017_0460
Date: 11th May 2017

For the Attention of Stephen Burgess

Dear Mr Isbell

Planning Application 0460/17– Land at Back Hills, Botesdale: Archaeology

This site lies in an area of archaeological potential, overlooking a watercourse in a location which is topographically favourable for early occupation of all periods. Prehistoric and medieval finds have been discovered immediately to the west of the proposed development area (HER no. BOT 015), with Roman and Saxon finds further west (BOT 004). These are indicative of wider activity in the vicinity, however, this site has never been the subject of systematic archaeological investigation and there is high potential for previously unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.

Whilst we would strongly advise that archaeological evaluation is undertaken at this pre-determination stage, as there is a risk that significant finds will be identified which require preservation in situ, and thus require revisions to the layout of the site which would have both financial and time costs, if the developer is happy to recognise and accept this risk, we would not advise refusal of planning permission if the required archaeological assessment is not undertaken prior to the determination of this application.

Should the Local Planning Authority be minded to grant planning permission without a requirement for up front archaeological investigation, we would advise that in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage assets before they are damaged or destroyed.

In this case the following two conditions would be appropriate:

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

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

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

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

REASON:

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

INFORMATIVE:

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site, **before approval of layout and drainage under reserved matters**, and 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

Your ref: 0460/17
Our ref: Botesdale – land at Back Hills
00049829
Date: 09 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Stephen,

Botesdale: land at Back Hills – developer contributions

I refer to the application for outline planning permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

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

Whilst most infrastructure requirements will be covered under Mid Suffolk District Council's Regulation 123 list of the CIL charging schedule it is nonetheless the Government's intention that all development must be sustainable as set out in the National Planning Policy Framework (NPPF). On this basis the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.

Site specific matters will be covered by a planning obligation or planning conditions.

The National Planning Policy Framework (NPPF) paragraph 204 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.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 and will charge CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 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 6th 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 will form the basis of a future CIL bid for funding:

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.'

SCC anticipates the following **minimum** pupil yields from a development of 40 dwellings, namely:

- a. Primary school age range, 5-11: 10 pupils. Cost per place is £12,181 (2016/17 costs).

- b. Secondary school age range, 11-16: 7 pupils. Cost per place is £18,355 (2016/17 costs).
- c. Secondary school age range, 16+: 2 pupils. Costs per place is £19,907 (2016/17 costs).

The local catchment schools are St Botolph's CEVCP School, Botesdale, and Hartismere School, Eye.

Based on existing forecasts SCC will have surplus places available at the catchment primary school but no surplus places available at the catchment secondary school, for which CIL funding of at least £168,299 (2016/17 costs) will be sought.

- 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 would anticipate up to 4 pre-school pupil.

In this Ward there is currently a surplus of places available.

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 Martin Egan.

Site specific matters will be covered by a planning obligation or planning conditions.

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 CIL contribution of £216 per dwelling is sought i.e. £8,640, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. 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.

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.** 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. 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.

- 9. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
- 10. Superfast broadband.** 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.


11. Legal costs. SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

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

The above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

I would be grateful if the above information can be provided to the decision-taker in respect of this planning application.

Yours sincerely,


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

cc Carol Barber, Suffolk County Council
Martin Egan, Suffolk County Council
Floods Planning, Suffolk County Council

From: Jason Skilton
Sent: 14 July 2017 12:13
To: X Delete Aug 17 - Planning Emails
Cc: Stephen Burgess
Subject: 2017-07-14 JS Reply Land at Back Hills, Botesdale, IP22 1DW Ref 0460/17

Dear Stephen Burgess,

Subject: Land at Back Hills, Botesdale, IP22 1DW Ref 0460/17

Suffolk County Council, Flood and Water Management have reviewed application Ref 0460/17.

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

1. Indicative Drainage Plan Layout Ref 253/2015/03 – P1
2. Flood Risk Assessment and Drainage Strategy Addendum Ref 312/2016/FRA Rev B
 - a. Appendix A - Location Plan
 - b. Appendix B - Existing Greenfield Rate Calculation
 - c. Appendix C - Proposed layout
 - d. Appendix D - Indicative Drainage Layout
 - e. Appendix E - Proposed Greenfield Rate Calculation
 - f. Appendix F - Hydraulic Modelling results - Infiltration
 - g. Appendix G - Hydraulic Modelling results – No Infiltration
 - h. Appendix H - Anglian Water Asset Record – Extract.

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;

2. The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

3. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

4. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act.

5. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864



[Protective Marking]

0460/17

Suffolk Fire and Rescue Service

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

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Your Ref: 0460/17
Our Ref: FS/F190970
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: http://www.suffolk.gov.uk

Date:

06/03/2017
Planning Control Received
09 MAR 2017
Acknowledged:
Date:
Pass to:

Dear Sirs

Land at Back Hills, Botesdale, Suffolk, IP22 1DW
Planning Application No: 0460/17

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 Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for firefighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

[Protective Marking]

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



Mrs A Kempen
Water Officer

Copy: Mr Phil Cobbold, Philip Cobbold Planning Ltd, 42 Beatrice Avenue,
Felixstowe, Suffolk, IP11 9HB

Enc: Sprinkler information.

[Protective Marking]



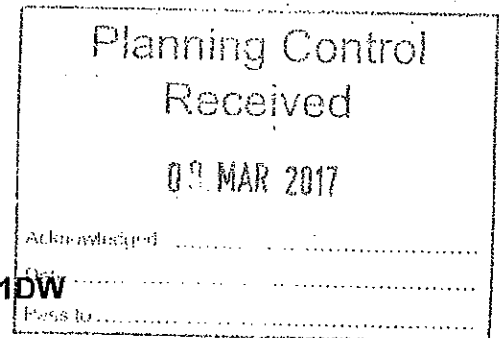
Suffolk Fire and Rescue Service

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

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Your Ref:
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date:



Planning Ref: 0460/17

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land at Back Hills, Botesdale, Suffolk, IP22 1DW
DESCRIPTION: 40 Dwellings
NO: HYDRANTS 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.

[Protective Marking]

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.

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

Yours faithfully



Mrs A Kempen
Water Officer

Consultee Comments for application 0460/17

Application Summary

Application Number: 0460/17

Address: Land at Back Hills, Botesdale, IP22 1DW

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

Case Officer: Stephen Burgess

Consultee Details

Name: Mrs Leeann Jackson-Eve

Address: Wayside Cherry Tree Lane, Botesdale, Diss IP22 1DL

Email: botesdale_pc@btopenworld.com

On Behalf Of: Botesdale Parish Clerk

Comments

Botesdale Parish Council objects to the application on the basis that there is insufficient evidence that the access location is viable and will not add to existing problems exiting Back Hills.

Councillors generally accept the principle of development on the site. However, the Strategic Housing Land Availability Assessment (SHLAA) in May 2016 assessed the estimated yield at this site as 20 dwellings and this proposal is double that. There is significant concern about the location of the access and the usefulness of a speed survey conducted out of term time. There is considerable anecdotal evidence of difficulties exiting Back Hills and there is every reason to think that a new access in close proximity to the national speed limit zone will also be potentially hazardous. Nothing in the application addresses these existing problems and there are no proposals to mitigate the impact of a second access on that stretch, such as extending the 30mph zone. It is not accepted that there would be few additional vehicle movements through the village via Back Hills and Diss Road and this assertion runs counter to the claim that additional residents will support local services. Public transport links are misrepresented as they are not currently sufficient to limit these movements. Additionally, there is a question concerning the benefit of giving an area of land to the school/pre-school as it is already on a long lease to the pre-school. Finally, councillors expressed dismay that there has been no opportunity to discuss the proposals in advance of an application.



Consultation Response Pro forma

1	Application Number	0460/17 Back Hills, Botesdale	
2	Date of Response	16.3.17	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • no harm to a designated heritage asset because it would not adversely affect the setting of the conservation area or of nearby listed buildings. 2. The Heritage Team finds no reason to object on heritage grounds at this stage.	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The application is in outline form with matters other than access reserved. The headline description states the proposed number of dwelling units and an illustrative scheme is included. Since layout and appearance in particular are not part of the application, it is difficult to give more than outline comment and in general Heritage would prefer to see a full application where impact on heritage assets is likely.</p> <p>The site lies on the edge of Botesdale, adjoining the Conservation Area on the west side. On the east side, across Hall Lane, lies Redgrave Park, a landscaped park designed by Lancelot 'Capability' Brown. The park contains listed structures, but as a park is not designated as a registered park. Nonetheless it should be treated as an undesignated heritage asset. The Special Landscape Area which adjoins the site to the north extends to include Redgrave Park to the east. On historic maps, the site is marked as allotments; the 1900s development to the south is on former allotment land.</p> <p>The Conservation Area at Botesdale includes areas beyond the historic core of the village. The application site makes no particular contribution to the character or setting of the Conservation Area and is therefore omitted from that designation, and similarly from the Special Landscape Area. For similar reasons, the present proposal is not considered to have particular impact on the character, appearance or setting of the Conservation</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>Area.</p> <p>Redgrave Park touches the edge of both Redgrave and Botesdale settlements, but otherwise continues to enjoy a rural setting. The introduction of housing across a road from the park would have potential to erode this. The adjacent part of Redgrave Park has a reasonable screen of trees defining its limit; historic maps suggest there was a much deeper belt of trees in the park at this point. This sense of enclosure in the park, and separation from the settlement can be achieved by including a green buffer within the site along Hall Lane, as shown in the illustrative plan.</p> <p>In summary there is potential for the outline proposal to be achieved without material harm to heritage assets, but until all the matters are submitted it is not possible to express support.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	<p>Recommended conditions</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.

From: David Pizzey
Sent: 27 February 2017 10:57
To: Stephen Burgess
Cc: Planning Admin
Subject: 0460/17 Land at Back Hills, Botesdale.

Stephen

I have no objection to this application as, based upon the indicative layout plan, no significant trees should be lost or affected by the proposal.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 24 February 2017 11:20
To: David Pizzey
Subject: Consultation on Planning Application 0460/17

Correspondence from MSDC Planning Services.

Location: Land at Back Hills, Botesdale, IP22 1DW

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

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](#)

We request your comments regarding this application and these should reach us within 21 days. Please make these online when viewing the application.

From: Nathan Pittam
Sent: 28 February 2017 12:33
To: Planning Admin
Subject: 0460/17/OUT. EH - Land Contamination.

M3 : 190478
0460/17/OUT. EH - Land Contamination.
Land at, Back Hills, Botesdale, DISS.
Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths ...

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards

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
w: www.babergh.gov.uk www.midsuffolk.gov.uk



Historic England

EAST OF ENGLAND OFFICE

Mr Stephen Burgess
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582738

Our ref: **W:** P00557052

16 March 2017

Dear Mr Burgess

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

**LAND AT BACK HILLS, BOTESDALE, IP22 1DW
Application No. 0460/17**

Thank you for your letter of 24 February 2017 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

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

Yours sincerely


Clare Campbell

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00020562

Local Planning Authority: Mid Suffolk District

Site: Land at Back Hills, Botesdale

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

Planning Application: 0460/17

Prepared by: Sandra Olim

Date: 04 April 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

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 Botesdale Water Recycling Centre that will have available capacity for these flows.

Section 3 – Foul Sewerage Network

- 3.1 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

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 Not applicable
-

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices



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

27/03/2017

For the attention of: Stephen Burgess

Ref: 0460 / 17; Land at Back Hills, Botesdale, IP22 1DW

Thank you for consulting us on the application for outline planning permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

Recommendations

In terms of the likely visual effect on the surrounding landscape, the proposals will inevitably have an impact on the existing landscape due to the existing open character of the site.

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

- 1) A viewpoint location plan and analysis and constraints plan will need to be produced which informs a detailed landscape strategy, demonstrating how the proposals (including existing public rights of way) link with the residential and movement network. In order to create an appropriate public realm and provide suitable levels of amenity space,
- 2) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics,
- 3) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, (if the application is approved),
- 4) The corridor of green open space along the existing footpath along southern boundary contributes to maintaining an attractive setting. Views from footpath to the development should be designed to provide passive surveillance,
- 5) The northern, eastern southern site boundaries should be designed to respond to the existing tree and hedge planting and to provide adequate screening of the development. The landscape strategy should also reinforce and retain the existing planting within the site,
- 6) The loss of existing trees on the woodland area to the west of the site could be avoided if a woodland management approach is applied to the site. Retaining as many of the existing vegetation as possible while clearing scrub areas to allow walking routes within the woodland area while maintaining areas which contribute to habitat creation,



The proposal

The application plans set out the outline planning permission (with all matters other than means of access reserved) for residential development of 40 dwellings with associated improvements to public footpaths, creation of public open space and provision of area of woodland for use by primary school.

The site is located on the north eastern edge of Botesdale village, adjacent to the B1113 Hall Lane. The site is bounded by 'Back Hills' lane to the north, the B1113 to the east, residential development to the south and St Botolphs Primary School to the west.

Two open space areas have been identified for this development alongside tree and hedge planting within the residential layout. Hedge and tree planting has been proposed on the northern boundary to screen views from Back Hills into the development. Grass verges, hedge and tree planting is accommodated on the eastern boundary along Hall Lane.

The open space to the west of the site is an existing area with mature and self-seeded tree planting. A pedestrian link has been proposed which runs across this open space linking existing school grounds and proposed development.

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape Statement and an indicative layout plan.

The Landscape Statement outlines the main existing characteristic and features of the site and includes a brief assessment of the visual impact of the proposed development in the landscape and nearby houses but the report does not include clear mitigation measures to inform and influence any detailed future development layout of the site and has fails to show the location of viewpoints on a plan and an analysis and constraints plan which informs outline design layout.

As part of the outline application submission the indicative site layout plan shows the areas designated for residential development, footpaths and open space including attenuation area as part of SuDS. As these proposals develop a greater level of detail will be required, especially how the footpath corridor will work on its narrower part of the site against the proposed dwellings along this boundary.

Likely impact on the surrounding landscape

The Suffolk Landscape Character Assessment (SCLA) identifies the Landscape typology of the site as an area of "Rolling Farmlands and Furze"; the valley floor to the north is recorded as "Wooded Valley Meadowlands and Fens. Some of the key characteristics of both typologies are mixed hedgerows of hawthorn, dogwood and blackthorn with oak, ash and field maple, fragmentary cover of woodland, larger settlements, network of drainage ditches and sense of quiet and rural isolation in many places, amongst others. In general terms the landscape reflects to the typology, but is eroded by loss of hedgerow and tree cover. There is an expectation that some of these landscape principles will be designed into the emerging development proposals.

As part of a desktop study it is clear that the openness of the northern and eastern boundaries and the impact that any development will have alongside Back Hills and Hall Lane will create a particularly exposed boundary edge. Another sensitive edge is along the existing footpath running south to north-east corner of the site. This edge also makes boundary with existing dwellings and views from their properties must be assessed.

Proposed mitigation

There are opportunities to create small woodland parcels within the development area and hedgerow planting along the site boundaries to mitigate the visual impact of the proposals and create a suitable green infrastructure. The site already benefits of existing hedgerow and tree planting to the south-east corner boundary which should be strengthened with new planting. The western boundary is an area of tree planting and scrub providing a good green gap between the school and proposed site for development. The rest of the site boundaries are exposed and hedge and tree planting has been proposed to mitigate the impact of the development.

Additional planting will be necessary to increase screening and filter views to the proposed development from the existing dwellings to the south.

The proposals suggest that existing self-seeded trees to the west of the site are to be removed and new hedgerow planting is planted instead, which may reduce screening properties and damage possible existing habitats.

Proposed highway frontage treatment is acceptable and contributes to existing local rural character as well as softening the built form within the development site.

The indicative proposal shows an area of water attenuation and green open space on the southern edge of the proposed development. As part of this feature, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting.

An appropriately detailed landscape and boundary plan will be required to support the application to both address the constraints and planning requirements and provide a comprehensive landscape proposal, suitable to limit any negative visual effect the proposals may have on the existing settlement.

Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI
Landscape Architect Consultant
Telephone: 03330136858
Email: almudena.quiralte@essex.gov.uk

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



Stephen Burgess
Planning Department
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

23/03/2017

Dear Stephen,

RE: 0460/17 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of 40 dwellings. Land at Back Hills, Botesdale

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

We have read the ecological survey report (Hillier Ecology Ltd, November 2016) and we note the findings of the consultant.

The ecological assessment considers the potential impacts of the proposed development on the field which forms the main part of the application site. However, the indicative layout plan and the red line boundary both show the application site incorporating the strip of woodland on the western side of the site. The indicative layout plan indicates that the woodland will form part of the development's public open space. No assessment is provided of the likely impacts of such a use on the woodland (which is potentially a Priority habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)), or any protected and/or Priority species which it supports. We recommend that further assessment of such impacts is made prior to the determination of this application.

It is also noted that the ecological survey was undertaken in November, outside of the bird breeding season. It is therefore unclear whether the application site is likely to support any ground nesting birds, such as skylark (a Priority species). Further consideration should be given to likely impacts on such species and suitable measures must be identified and secured to mitigate any impacts.

Notwithstanding the above, the current proposals include plans to retain the woodland, and include open space and an attenuation area. These areas should have a management strategy to maximise biodiversity, and the retention of the woodland should be secured as a condition of planning consent. Woodland and hedgerow features should also be protected from lighting and we recommend that a sensitive lighting strategy, using the Suffolk County Council street lighting standard, is implemented should any development occur at this site.

There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development. For more information on this topic, see the Hedgehog Street website.

In addition, should it be concluded that development in this area is acceptable, we request that the

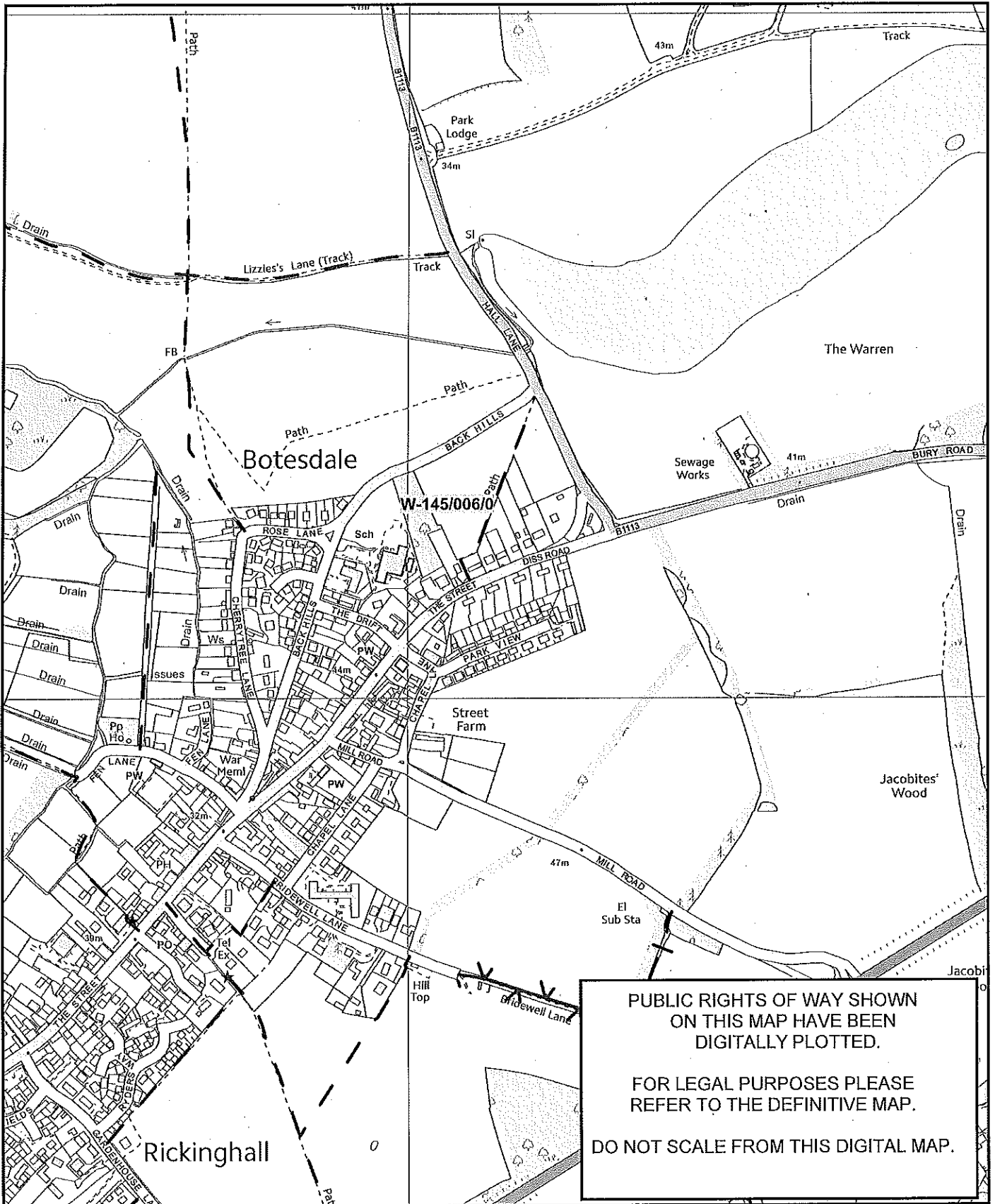
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Registered charity no 262777

recommendations made within the report are implemented in full, via a condition of planning consent.

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

Yours sincerely

Jill Crighton
Conservation Planner

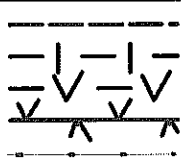


0460/17 Land at Back Hills, Botesdale
Public Footpath 6



Suffolk
County Council

Resource Management
 Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

Public Footpath
 Bridleway
 Restricted Byway
 Byway
 Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/03/2017



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

Planning Application (0460/17)

SITE: 40 Dwellings at Land on Back Hills, Botesdale, IP22 1DW

Applicant: Burgess Homes

Planning Officer: Mr Stephen Burgess

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 Burgess

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 40 dwellings at land on Back Hills, Botesdale.

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.

I take on board that this is an initial outline planning application and that further details will be forwarded by the developers at the Reserved Matters stage. 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 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.

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 general observations for this development are that I applaud the designer's comments that the proposals will meet each of the three dimensions of sustainable development. However in order to have these three elements there also needs to be good security for the site, in order that the 'feel good' factor will enhance these three dimensions.

I trust the design in particular will look at techniques and principles to assist with the orientation and navigation of the site, creating identifiable spaces to discourage and minimise the risk of crime and Anti-Social Behaviour through natural and informal surveillance.

NOT PROTECTIVELY MARKED
RESTRICTED/CONFIDENTIAL

From looking at the initial indicative layout, I believe there will be a number of car ports and that they look like they will be quite set back from the main properties. I would urge caution in sighting them in this way, as such locations tend to lack any form of natural or formal surveillance to prevent, in particular theft from motors. Police prefer garages to car ports as they provide far more security.

Should a number of car ports be implemented, I strongly recommend that they are in line with the main property and not set back. That dusk to dawn security lighting is installed to the side of the properties overlooking such installations and if possible the front of the car port is secured with lockable gates. (SBD New Homes 2016, page 62, Para 52.1 refers)

I note that a focal part of the development will be the already established diagonal footpath that runs from north-east to south-west. I note that the developers have stated this footpath will be widened. Using the principles of "Secure By Design New Homes 2016." I urge the developers to make the width of this footpath at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles. I further recommend low growing and regularly maintained vegetation on either side, that will prevent hiding places for any would be offender. (SBD 2016, pages 14-17 at Paras 8.1-8.19 refer). It would greatly assist security and well-being if this area is also well lit.

I would like to know more about how the perimeter of the development will be secured, especially along:

- a) The south eastern side by the current 9 properties on The Street.
- b) The western side by St Botolphs pre-school
- c) The northern side along Back Hills

I have concerns at the number of envisaged trees in between the rear of the proposed two sets of four properties, bordering Back Hills and part of the new access road, (pictured right) which if not properly maintained could obscure surveillance of the area. I would also like to know more about this area, as I have concerns that if it is classed as a public space it will allow offenders a permeable area to access the rear of any of these suggested properties.



I would recommend the rear of all properties are secured with 1.5m close boarded fencing accompanied by further 300 cm high trellis to assist in providing natural light and further surveillance for these areas.

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

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 dis-order.

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 also like to see 1 metre metal hooped railings around the communal areas.
- 3.2 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.
- 3.3 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.
- 3.4 All litter bins should be of a fire retardant material.
- 3.5 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.
- 3.6 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.
- 3.7 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 1st 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
- 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. However, I do have concerns over any proposed rear car parking, the amount of envisaged vegetation and how the design of the central footpath will be incorporated.

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

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

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