

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Sent:** 25 Apr 2024 03:09:06  
**To:**  
**Cc:**  
**Subject:** FW: 2024-04-25 JS reply Land To The North And West Of, School Road, Elmswell, Suffolk Ref DC/23/05651 - OUT  
**Attachments:**

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**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>  
**Sent:** Thursday, April 25, 2024 3:09 PM  
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Cc:** Daniel Cameron <Daniel.Cameron@baberghmidsuffolk.gov.uk>  
**Subject:** 2024-04-25 JS reply Land To The North And West Of, School Road, Elmswell, Suffolk Ref DC/23/05651 - OUT

Dear Daniel Cameron,

Subject: Land To The North And West Of, School Road, Elmswell, Suffolk Ref DC/23/05651 - OUT

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/23/05651.

The following submitted documents have/has been reviewed and the LLFA recommends maintaining a **holding objection** at this time:

- Flood Risk Assessment & Drainage Strategy Ref BM12457/001 V4 FINAL January 2024

A holding objection is necessary because the proposed development is within an area predicted to be affected by surface water flooding (low to high) and is therefore contrary to national and local policy/guidance. Therefore, the proposals maybe subject to a sequential/exception test. The proposed use of the is classified as more vulnerable (NPPF Annex 3).

**National Planning Policy Framework**

**NPPF 159.** Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

**NPPF 161.** All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- (a) applying the sequential test and then, if necessary, the exception test as set out below;
- (b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- (c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- (d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long[1]term, seeking opportunities to relocate development, including housing, to more sustainable locations

If the **LPA are minded to approving this application**, then the following planning conditions would be recommended.

1. Within the Reserved Matters application(s), a surface water drainage scheme for the proposed development shall be submitted as part of the relevant application(s). The scheme shall 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 Qbar 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 rainfall event including climate change, 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 flow paths 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;
- g. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.
- h. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
  - i. Temporary drainage systems
  - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
  - iii. Measures for managing any on or offsite flood risk associated with construction

The scheme shall be fully implemented as approved.

*Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

2. Within 28 days of practical completion of the last dwelling or unit, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

**Reason:** To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

## 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 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment may be subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton  
Flood and Water Engineer  
Suffolk County Council

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

From: [planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk) <[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)>  
Sent: Friday, April 19, 2024 1:56 PM  
To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
Subject: MSDC Planning Re-consultation Request - DC/23/05651 - OUT

Please find attached planning re-consultation request letter relating to planning application - DC/23/05651 - Land To The North And West Of, School Road, Elmswell, Suffolk

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

Your ref: DC/23/05651  
Our ref: Elmswell – land to the north and west  
of School Road 60354  
Date: 29 April 2024  
Enquiries: Neil McManus  
Tel: 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Daniel Cameron,  
Growth & Sustainable Planning,  
Babergh and Mid Suffolk District Councils,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
Suffolk,  
IP1 2BX

Dear Daniel,

**Elmswell: land to the north and west of School Road – developer contributions**

I refer to the proposal: outline planning application (access to be considered, all other matters reserved) – erection of Care Village comprising 66-bedroom care home (C2 Use), 40no. Extra Care Bungalows (C2 Use), management office (E(g)(l) Use), club house, community growing area, orchard, community bee hives, and open space provision.

I previously submitted a consultation response letter dated 11 December 2023 which was time-limited up to and including 11 June 2024. This letter extends the advice for a further period up to and including 11 December 2024.

Yours sincerely,



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

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

From: GHI Floods Planning <floods.planning@suffolk.gov.uk>

Sent: Tuesday, May 14, 2024 12:59 PM

To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

Cc: Daniel Cameron <Daniel.Cameron@baberghmidsuffolk.gov.uk>

Subject: 2024-05-14 JS Reply Land To The North And West Of, School Road, Elmswell Ref DC/23/05651 - OUT

Dear Daniel Cameron,

Subject: Land To The North And West Of, School Road, Elmswell Ref DC/23/05651 - OUT

Please see the LLFA previous consultation reply. Our position remains unchanged.

Kind Regards

Jason Skilton

Flood and Water Engineer

Suffolk County Council

Our Ref: SCC/CON/2939/24

Date: 4 September 2024

Highways Enquiries to: [Highways.DevelopmentControl@suffolk.gov.uk](mailto:Highways.DevelopmentControl@suffolk.gov.uk)



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

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

For the attention of: Daniel Cameron

Dear Daniel

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/23/05651**

**PROPOSAL:** Outline Planning Application (Access to be considered, all other matters reserved) - Erection of Care Village comprising 66 bedroom care home (C2 Use), 37 No. Extra Care Bungalows (C2 Use), 3 No. Almshouses (C3), Management Office (E(g)(I) Use), Club House, Community Growing Area, Orchard, Community Bee hives and Open Space Provision

**LOCATION:** Land To The North And West Of, School Road, Elmswell, Suffolk

**Further to the submission of additional information, notice is hereby given that the County Council as Highway Authority make the following comments:**

- 1. Access visibility splays:** We are satisfied that the amended access drawing illustrates acceptable visibility splays for the location and speed limit.
- 2. Width of Church Road at access point:** The lack of conclusive traffic swept path access drawings and a clearly dimensioned plan does not provide us with enough confidence to address this comment (based upon our knowledge of the location and measurements taken). Subsequently, within the recommended planning conditions overleaf, the access condition includes a requirement for localised road widening should it be necessary.
- 3. Provision of Cycle route behind St John's Church within development:** The applicant's transport consultant has indicated that this matter could be dealt with via planning condition or contribution. As this route is within the applicant's ownership/ control our strong preference would be a planning condition for the delivery of a paved route that could dedicated as highway at an appropriate time.
- 4. Contribution towards the Elmswell to Woolpit community path:** This contribution is necessary for the Highway Authority to support this proposal and accord with NPPF 114 and 116 to enable residents to benefit from the amenities of both villages without the need for motor vehicle travel. Subsequently, this must be included within the Section 106 Agreement for this proposal.

## **Recommended planning conditions:**

Condition: No part of the development shall be commenced until details of the proposed access and any necessary localised road widening of School Road have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form.

Reason: To ensure that the access is designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

Condition: No part of the development shall be commenced until details of the proposed connections onto Parnell Lane and any improvements to Parnell Lane have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to the occupation of the building.

Reason: To ensure that any access to and via Parnall Lane is designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

Condition: No part of the development shall be commenced until details of the proposed shared use cycle route to the north of St John's Church indicatively shown on Drawing No. 1661-CAM-XX-XX-DR-A-PL06 Rev D have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be laid out and constructed in its entirety prior to occupation.

Reason: To ensure that the necessary highway improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety and sustainable travel.

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

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

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.

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of residents and the public.

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

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

Condition: Before the development is commenced details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented for each dwelling prior to its first occupation and retained as such thereafter.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with the current Suffolk Guidance for Parking (2023) where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety.

Condition: Before the development is commenced, details of the areas to be provided for the secure, covered and lit cycle storage including electric assisted cycles and mobility scooters shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented for each dwelling prior to its first occupation and retained as such thereafter.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long term maintenance of adequate on-site areas and infrastructure for the storage of cycles and mobility scooters and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking (2023).

Condition: Before the development is commenced, details of the areas to be provided for the storage and presentation for collection/emptying of refuse and recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved bin storage and presentation/collection area shall be provided for each dwelling prior to its first occupation and shall be retained thereafter for no other purpose.

Reason: To ensure that space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan.

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) Details of deliveries times to the site during construction phase.
- o) Layout of facilities above to be included on a plan.

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



## **Section 106 contributions:**

**Contribution towards the Elmswell to Woolpit community path:** A Section 106 financial contribution of £850 per dwelling or care home bedroom (estimated total of £90,100) is required to help fund the delivery of the new footway/cycleway between Elmswell and Woolpit to encourage modal shift in support of promoting sustainable transport in accordance with NPPF 114 and 116.

Schemes promoted in the Elmswell/Woolpit locality are expected to proportionately contribute towards this project and have done to date.

Please also note the requirements of the SCC PROW team regarding the creation of a public footpath within the development and subsequent dedication and associated S106 contribution of £5,000.

Yours sincerely,

**Ben Chester**

**Senior Transport Planning Engineer**

Growth, Highways and Infrastructure

Your ref: DC/23/05651  
Our ref: Elmswell – land to the north and west  
of School Road 60354  
Date: 11 December 2023  
Enquiries: Neil McManus  
Tel: 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Daniel Cameron,  
Growth & Sustainable Planning,  
Babergh and Mid Suffolk District Councils,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
Suffolk,  
IP1 2BX

Dear Daniel,

**Elmswell: land to the north and west of School Road – developer contributions**

I refer to the proposal: outline planning application (access to be considered, all other matters reserved) – erection of Care Village comprising 66-bedroom care home (C2 Use), 40no. Extra Care Bungalows (C2 Use), management office (E(g)(l) Use), club house, community growing area, orchard, community bee hives, and open space provision.

Pre-application advice was provided by way of letter dated 22 August 2023.

Summary of infrastructure requirements split between CIL/s106:

CIL	Libraries improvements @ £216 per dwelling	£22,896
CIL	Household waste @ £141 per dwelling	£14,946
S106	Elmswell/Woolpit new footway/cycleway contribution @ £850 per dwelling	£90,100
S106	Monitoring fee per obligation trigger point	£476
S106	Highways	tbc

**The SCC Growth, Highways and Infrastructure team advises that if the local planning authority (LPA) are minded recommending the approval of planning permission, this must be subject to securing the above planning obligations in a Deed. Alternatively, if the LPA were minded recommending refusal, the reasons for refusal must include the absence of securing the above planning obligations in a Deed as the lack of them would be contrary to relevant Development Plan policies.**

The National Planning Policy Framework (NPPF) [September 2023] paragraph 57 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 council and district councils have a shared approach to calculating infrastructure needs, in the adopted Section 106 Developers Guide to Infrastructure Contributions in Suffolk.

The Babergh and Mid Suffolk Joint Local Plan Part 1 was adopted by Mid Suffolk District Council on 20 November 2023. The plan will provide a framework for shaping communities – and guiding future development – until the year 2037. Relevant policies include: SP08 – Strategic Infrastructure Provision; LP06 – Supported and Special Needs Housing; LP29 – Safe, Sustainable and Active Transport Policy; LP30 – Managing Infrastructure Provision Policy; LP31 – Health and Education Provision Policy; LP32 – Developer Contributions and Planning Obligations.

The Elmswell Neighbourhood Development Plan (NDP) is adopted following a local referendum and confirmed in an ‘out of meeting’ decision published on Friday 24 November 2023 by Mid Suffolk District Council. This NDP, which covers the plan period to 2037, now forms part of the development plan and will be used to help determine planning applications in the parish unless material considerations indicate otherwise.

### **Community Infrastructure Levy**

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

Mid Suffolk District Council (MSDC) operate a CIL scheme and infrastructure is funded as set out in MSDC’s infrastructure funding statement (IFS). Any s106 contributions required have been set out in MSDC’s IFS and will not therefore result in any possible duplication of moneys (historically referred to as ‘double dipping’, although the CIL Regulations 2019 removed this).

CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) came into force on 1 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

The details of the impact on local infrastructure serving the proposed development are set out below:

- 1. Transport issues.** Refer to the NPPF Section 9: ‘*Promoting sustainable transport.*’ A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via

Section 38 and Section 278. Suffolk County Council FAO Ben Chester will coordinate this.

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

A financial contribution of £850 per dwelling i.e., £90,100 (BCIS indexed) is requested to help fund the delivery of the new footway/cycleway between Elmswell and Woolpit to encourage modal shift in support of promoting sustainable transport. Schemes promoted in the Elmswell/Woolpit locality will be expected to proportionately contribute towards this project.

In addition, the county council welcomes the inclusion of a scheme to deliver a section of the new footway/cycleway behind St John the Divine, Elmswell. The Design and Access Statement on page 35 shows a new Cycle and Footpath – to be secured by a planning condition and delivered to adoption standards by the applicant.

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 (updated 2023).

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

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e., £22,896, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of  $(30 \times £3,000) = £90,000$  per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

**3. 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.

A future CIL funding bid of at least £14,946 (£141 per dwelling) will be made to improve the HWRC provision at Bury St Edmunds serving the proposed development.

- 4. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 60 to 65 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g., Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

Pre-application advice was previously provided (attached) – and is still relevant in respect of the application. Colleagues in Adult and Communities Services and Public Health and Communities might make further representations.

- 5. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority (LLFA). Paragraphs 159 – 169 refer to planning and flood risk and paragraph 167 states: *'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

*a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

*b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*

*c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*

- d) any residual risk can be safely managed; and*
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.'*

And paragraph 169 says, '*Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*

- a) take account of advice from the lead local flood authority;*
- b) have appropriate proposed minimum operational standards;*
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d) where possible, provide multifunctional benefits.'*

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

- 6. Ecology, landscape & heritage.** These are matters for the Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals. Refer to the DLUHC guidance on the Natural environment [updated 21 July 2019].
- 7. 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 firefighting which will allow SCC to make final consultations at the planning stage.
- 8. Superfast broadband.** This should be considered as part of the requirements of the NPPF Section 10 '*Supporting high quality communications.*' 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.

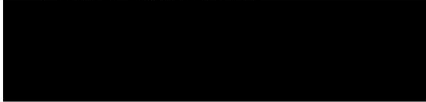
As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within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

**9. 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.

**10. Monitoring fee.** The CIL Regulations allow for the charging of monitoring fees. In this respect the county council charges £476 for each trigger point in a planning obligation, payable upon completion of the Deed.

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

Yours sincerely,



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

cc Ben Chester/Julia Proctor, SCC (highways)  
Jason Skilton, SCC (LLFA)  
Ed Abbott, SCC (Adult and Community Services)  
Jonathan Gear, SCC (Public Health and Communities)

Your ref: DC/23/05651  
Our ref: Elmswell – land to the north and west  
of School Road 60354  
Date: 13 May 2024  
Enquiries: Neil McManus

Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Daniel Cameron,  
Growth & Sustainable Planning,  
Babergh and Mid Suffolk District Councils,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
Suffolk,  
IP1 2BX

Dear Daniel,

**Elmswell: land to the north and west of School Road – developer contributions**

I refer to the proposal: outline planning application (access to be considered, all other matters reserved) – erection of Care Village comprising 66-bedroom care home (C2 Use), 40no. Extra Care Bungalows (C2 Use), management office (E(g)(l) Use), club house, community growing area, orchard, community bee hives, and open space provision.

Reason(s) for re-consultation: the local planning authority have received further information from the applicant.

I previously submitted consultation response letters dated 11 December 2023 and 29 April 2024 which are still applicable and are time-limited up to and including 11 December 2024. In respect of CIL, the development proposal (C2 use) is zero-rated. However, SCC highlights the potential for a future CIL funding bid to BMSDC to help fund local infrastructure if the scheme is granted planning permission and the scheme is built out. In addition, SCC has identified the need for a section 106 contribution of £90,100 towards the delivery of the new footway/cycleway between Elmswell and Woolpit – see letter dated 11 December 2023 for more information. I have no further comments to make in respect of this re-consultation.

Yours sincerely,

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

cc Ben Chester, SCC (highways)



**Planning Application (DC/23/05651)**

**Site:** Outline for Care village, comprising 66-bedroom care home, to include 36 bungalows, 4 Almshouses, Clubhouse, Community growing area, orchard and Community Beehive at Land North of School Road, Elmswell, IP30 9EH

**Applicant/Agent:** Richard Brown Planning Ltd. Slough, for Christchurch Land & Estates, Ipswich, IP4 1JU

**Planning Officer:** Mr Daniel CAMERON

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

Dear **Mr CAMERON**

Thank you for allowing me to provide an input for the above Planning Application.

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

This is a low crime area, as it has historically consisted of agricultural land, however, as the area has now opened up to more development, it is believed crime will rise. There is crime around the surrounding area and these details can be seen at paragraph six.

It is appreciated that this is an outline application and it is good to see that documents have been submitted to clarify certain details. However, without further detailed plans of the layout of the proposed site, (which it is expected will be forthcoming at the Reserved Matters Stage), it is difficult to comment in detail on these proposals.

Bearing this in mind at this stage on behalf of Suffolk Constabulary I do not feel I have enough information at present to state whether or not this application could be supported.

I do have a number of concerns around this proposed application and the possibility that if not correctly addressed the location could be the subject of antisocial behaviour and other forms of criminality, particularly theft and criminal damage. These concerns include;

- 1) The northern boundary of the site is close to a public pathway that leads under a railway bridge embankment.
- 2) The area is already opening up by the neighbouring residential dwelling application number DC/22/01615, the continuation of more development along this northern boundary opens up concerns regarding the safety of person's both using the main Ipswich to Cambridge railway line and anyone within the area.
- 3) There will be mainly hedging around the perimeter, with gaps to allow access and it is not known how the eastern perimeter bordering the new development will comprise. It appears that it will mainly comprise of trees and be quite open, there is a strong need for it to be physically secure to deter offenders and make sure that residents feel safe within their living areas.
- 4) Details have been mentioned regarding parking, but with no clear parking bays, it appears that the parking is limited and clarification is required as to how enough parking will be distributed and how?
- 5) There will be a clubhouse, will this be solely for residents or will it be opened to other local residents and will the clubhouse store alcohol?
- 6) The area will have numerous paths, particularly around the southern side of the site and it has been stated the western side may in the future comprise a footpath, running north to south.
- 7) There needs to be strong security for all access points and for the medical rooms and drug storage areas.
- 8) I have concerns regarding the proposed growing area and Community Orchard, which could be the subject of antisocial behaviour including criminal damage.

- A1** As a Design Out Crime Officer (DOCO) my role within the planning process is to give advice on behalf of Suffolk Constabulary in relation to the environmental design and the physical security of the layout and structures within this application, based upon the established principles of 'Crime Prevention through Environmental Design' (CPTED). **Looking 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**, which is advice that has been implemented worldwide since the early 1970's, looking at seven main principles, (see [Crime prevention through environmental design | College of Policing](#) and SBD Commercial 2023, Para 63.3). **Further information on CPTED can be found at [Crime prevention through environmental design - Wikipedia](#) or [Crime Prevention Through Environmental Design – Design For Security](#)** From this method of environmental design the police initiated Secure By Design at [Secured by Design - Secured by Design](#) There is no updated Secure By Design guidance document for these types of property, the last guide published is historic and was brought out in 2004, see [SBD-sheltered-accommodation.pdf \(securedbydesign.com\)](#) The UK Construction Industry does provide details of how developers can work with the police Secure By Design methods and lists a number of examples of Secure By Design accreditation for such developments at [Secured by Design – working with care homes across the UK - UK Construction Online \(ukconstructionmedia.co.uk\)](#) The general Principles mentioned within these comments relate to a Secure By Design document entitled SBD Commercial 2023, see [COMMERCIAL GUIDE 2023 v4.pdf \(securedbydesign.com\)](#)
- A2** **The design should look at CPTED 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 that include:**

Secured by Design (SBD) is an initiative based upon principles of **"designing out crime"** incorporating the latest security standards to address emerging criminal methods of attack.

Experience shows that incorporating security measures during a new build or refurbishment reduces crime and the fear of crime and disorder. The aim of the Police Service is to assist in the Design process to achieve a safe and secure environment for occupiers and visitors without creating a "fortress environment".

It is not a Design Out Crime Officer's role to make individual comments on highways and traffic situations, however, part of my remit is to look at the parking layout and express any concerns that may lead to crime or incidents of antisocial behaviour.

**Constructing well designed places and buildings that promote sustainable communities, improved health and wellbeing is an objective that Suffolk Police widely support. However, it is imperative that they must also be safe, secure, and accessible. This can be evidenced within a Health Impact Assessment, in that mitigating the opportunities for crime reduces and prevents both physical and mental harm, it is also about building strong, cohesive, vibrant, and participatory businesses and communities.** (see Paras 7.3 - 7.14 "NPPF and NPPG," at Secure By Design (SBD) Homes 2023).

**The National Design Guide states that the long-standing fundamental principles of good design are that where we live, work or take place in any other activities in our everyday lives should be subject to good design and fit for purpose; durable; and bring delight.**

I would be very pleased to work with the agent and/or the developer to ensure the proposed development incorporates the required elements.

***This is the most efficient way to proceed with any development and is a partnership approach to reduce the opportunity for crime and the fear of crime.***

## **1.0 GENERAL COMMENTS ON PROPOSED RESIDENTIAL AREA PLAN IN BRIEF**

- 1.1** Not getting the development and in particular the security of the site right from the outset could lead to the following problems.

**a) Burglary/Theft that could include;**

- I.** Damage from any break in that could render the location insecure and unable to keep users safe.
- II.** Theft of items, that could include items that are priceless to residents and could particularly cause residents distress at losing such cherished possessions.
- III.** Theft of specific items, such as machinery, tools, metal or parts from the proposed photovoltaic panels, that could prevent users from carrying out their daily work.
- IV.** Criminal Damage that could include graffiti and damage to produce/fruit and windows.

b) **Antisocial Behaviour** Either from users frustrated by their circumstances, or from outside person(s).

- 1.2 The perimeter plays an important part in securing any development**, particularly this type of development, the designs do not appear to show a fully secure perimeter. I have serious concerns at the way this area and in particular the northern area close to the main railway line has already been opened up by the new residential development, planning ref: DC/22/01615. Further development opens up the vulnerability for passengers on the **main Ipswich to Cambridge railway line and anyone within the area**, see [Vandalism and trespass - Network Rail](#) along with [Danger on the Railways - Wirral Safeguarding Children Partnership](#) and [The facts - You vs. Train \(youvstrain.co.uk\)](#) and [Urgent warning that rail tracks are 'not playground' as cases of kids risking lives spikes - Mirror Online](#) and [Children take selfies on Oxfordshire railway track | Oxford Mail](#) **More recently dated 14<sup>th</sup> December 2023** [Rail services disrupted due to trespasser at Stowmarket | Ipswich Star](#) Also (See SBD Commercial 2023, Paras 64.1-64.2).
- 1.3** The outer northern perimeter area with the underside of the railway bridge is also a concern as **historically these types of locations are known generators for crime, as they shield an offender from view until a passer-by is within this location and they tend to be darkened areas with no surveillance.**
- 1.4 For advice on Buildings Layout**, (see SBD Commercial Para 65.1).
- 1.5 For advice on the layout of roads and footpath** around the development (see SBD Commercial 2023, Paras 67.1-67.2, Paras 68.1-68.2, Paras 69.1-69.4, Paras 71.1-71.4 and Para 72.1).
- 1.6 For advice on boundaries** around the development and perimeter security, (see SBD Commercial 2023, Paras 73.1-73.3, 74.1-74.4 and Paras 75.1-75.2).
- 1.7 For advice on security fencing** (see SBD Commercial 2023, Paras 76.1-76.8).
- 1.8 For Advice on security gating** (see SBD Commercial 2023, Paras 77.1-77.3).
- 1.9 For advice on defensive hedging/vegetation** (see SBD Commercial 2023, Para 78.1).
- 1.10** For advice on the landscaping of the area, (see SBD Commercial 2023, Para 87.1).
- 1.11 It is not known how the parking will comprise and I have concerns there may not be enough parking to satisfy all parties**, including, residents, visitors and staff. If there is not enough parking it could lead to antisocial behaviour and other criminal activity (see SBD Commercial 2023, Paras 80.1-80.4, Paras 81.1-81.4 and Paras 82.1-82.5).
- 1.12 For electric vehicle parking** (see SBD Commercial 2023, Paras 83.1-83.2 and Paras 84.1-84.2).
- 1.13** Part 3, page 21 of the Design Access Statement highlights plans for some of the buildings, so it is taken from these designs that the individual bungalows will all have their own independent entrance systems and own letter boxes for individual mail delivery? These bungalows need to have good physical security and as they are more in line with residential properties, guide lines for these areas should be guided by SBD Homes 2023, for further details see in line with [HOMES GUIDE 2023 web.pdf \(securedbydesign.com\)](#). For guidance on physical security see in particular, part 2a, pages 34, Paras 22.1-22.13, Paras 23.1-23.36, Paras 24.1-24.21, Paras 27.1-27.10 and for multiple occupancy Paras 29.1-29.61, Paras 30.1-30.2, Paras 35.1-35.8, Paras 36.1-36.18, Paras 37.1-7, Paras 38.9-38.10, Para 39.1 and Paras 39.2-3.
- 1.14 It is strongly recommended in the interests of security, lifts and stairwells should be access controlled** (smart lifts) for internal and authorised access with fob access control on the stairs to each floor, including ground and push button release into the stair core to escape (check with fire strategy).
- 1.15 It is also recommended in the case of fire, a cut-off switch is incorporated for all communal door sets.** A usual method is to put in place a break glass container by the front door with a “fireman’s drop key”. However, this is not recommended as these types of keys can easily be purchased online and so compromise security. Instead, a police approved Gerda key, in a secure premises information box (PIB) is preferred. Further information can be found at <https://www.gerdasecurity.co.uk/productsandsolutions/premises-information-box.aspx>
- 1.16 It is strongly advised that a logging unit is co-located within the main block’s main entry panel** systems to automatically log which areas within the complex are being accessed and the times they are being accessed, in order to build up a picture of person(s) who access the area and have they been visually identified.

- 1.17** It is strongly recommended that for the main building **All external fire doors are fitted with door contact alarms** to alert staff if used and left insecure. Consideration should also be given to fitting other external doors (i.e., ground floor bedrooms) with alarms so that, if appropriate to the needs of the user, staff can be notified if the door is opened, particularly during the warm summer months. It is recommended that these alarms can be disabled to allow for normal functioning if required.
- 1.18** The design will include a growing area and community orchard, while such proposals are commendable, they usually lead to incidents of antisocial behaviour, from offenders throwing upending produce and either letting the items die off, or throwing them around the area, which can lead to criminal damage, particularly to windows. If such areas are incorporated, they need to be near to areas where there will be active surveillance to deter such actions.
- 1.19** Further information is requested on the design of the clubhouse and if it will be used for events, including for outside personnel to hire and if it will store alcohol and if so, how will it and any bar area be secured.

## **2.0 MEDICAL SECURITY.**

- 2.1 Drugs store:** It is assumed that the drugs stores will be locked and subject to the relevant storage of controlled drugs requirements, with access being strictly restricted to staff with the appropriate authority. Windows within drugs store must contain laminated glass and be alarmed when not in use. It is recommended that the drugs stores are co-located with nurse's stations to increase the opportunity for natural surveillance. If there is external storage of Medical Gases it is recommended that they are secured with Alarmed Robust Cages and covered by monitored CCTV. If there are radioactive sources then consultation with the Counter Terrorism Security Advisor (CTSA) is advised.
- 2.2 There are effectively two different types of drugs and medicine cabinet construction,** one is used for the storage of Medicines and one for the storage of Controlled drugs. Each type must conform to a certain standard or combination of standards that determines whether it is a controlled drug or medicine cabinet. British standard 2881:1989 applies to the Storage of drugs in healthcare premises and is the standard a drug or medicine cabinet (not controlled drug) must comply to within the United Kingdom. Drug and medicine cabinets manufactured to British standard 2881:1989 (level 1) are required to be able to:-
- Not be removed from the wall by a downward static force of 980Na in the centre of the top face
  - Not be removed from the wall by a horizontal static force of 590Na in the centre of a side face
  - To withstand an attack from a table knife for a period of 5 min. In an attempt to remove the door or remove the drug and medicine cabinet from the wall.
  - Withstand an attack from a smoker's butane filled lighter with no ignition or melting sufficient to form a hole.
- 2.3** The drug and medicine cabinets covered by this British Standard are intended for the storage of Medicines in Hospital wards, residential homes, and other healthcare premises at ambient temperatures. This standard (BS2881:1989) doesn't state specifically the method or materials to be used in the manufacture of a drug or medicine cabinet's construction but is essentially an attack criteria. It sets out what is expected of the drug or medicine cabinet and what it is expected to be capable of withstanding if placed under an attack.
- 2.4 Drugs Safes Certified to a CEN Grade of BS/EN 1143-1:** Where possible, it is recommended that safes/ cabinets are installed in an area that is already protected by the alarm system installed on the premises. If that is not possible, consideration should be given to adapting the existing system to ensure that it protects the area around the cabinet.
- 2.5 Controlled Drugs Cabinets:** Should comply, as a minimum, with the specifications set out in the Misuse of Drugs (Safe Custody) Regulations 1973 and not be expected to hold stocks of raw materials, exceeding 250 grams or CD preparations whose active ingredients do not exceed that weight. Generally, such cabinets should be constructed of, at a minimum, mild steel sheet at least 2 to 3mm thick. The locking mechanism should be as robust as possible to maximise security (e.g., a multiple-point).
- 2.6 Certification of PSRS, Safes and Cabinets:** The Home Office is aware there are PSRs, safes and cabinets on the market that have not been tested at a laboratory recognised by certification bodies within the European Fire and Safety Group (EFSG). Such items should be certified by EFSG members such as for UK BRE <http://www.bre.co.uk/>



### 3.0 Further recommendations for this location

3.1 For further information on crime prevention products referral should be made to the 'Secured by Design' Website <http://www.securedbydesign.com> and <http://www.soldsecure.com>.

### 3.2 Site Specific Specifications for Care Home:

(As referred in SBD Commercial 2023 and Secured by Design Sheltered Accommodation 2004.

- a) **External Doorsets** should meet standards as outlined in SBD Commercial 2023 at Paras 22.1-22.11 and in particular the standards at Para 22.1. Along with Paras 23.1-23.7, Paras 25.1-25.8 and Paras 26.1-26.3 and Sections 4 and 6, SBD Sheltered Accommodation 2004.
- b) **Internal Doors** Should meet standards outlined in SBD Commercial 2023 at Paras 51.1-51.4.
- c) **Main Communal Entrance doors** Should be controlled with an air-lock double door system to prevent tailgating. See SBD Commercial 2023, Para 45.5 and Section 3, SBD Sheltered Accommodation 2004.
- d) **Windows:** Should have restrictors on all windows and all ground floor doors/windows to conform to BS PAS 24:2022 or equivalent standard with Laminate glass and should meet standards as outlined in SBD Commercial 2023 at Paras 27.1-27.2 and Paras 28.1-28.13.
- e) **All external doors/fire doors** to be fitted with door contact alarms to alert staff if used. See SBD Commercial Paras and Section 5, SBD Sheltered Accommodation 2004.
- f) **Balconies at all levels** should be designed to exclude handholds and to eliminate the opportunity for climbing up, down or across between balconies. Drainpipes/soil pipes that provide access to roofs or balconies will require metal shrouds to prevent climbing.
- g) **Implementation of Access Control** In accordance with all Care home applications, **it is recommended that an electronic access control system is in place in accordance with the British Security Industry Association Guide to Access Control in care homes.** Staff on reception (or in the office) should have control over access from the main entrance doors into the reception area. Out of office hours the access control call system should link directly to the senior member of staff on duty. **Any block that relies on a single main entrance and exit should ensure that the security for that area is as high as possible, as once into an uncontrolled area an offender then has access to anywhere and everywhere.** Video entry systems should not allow tradesman buttons (SBD Commercial 2023, Paras 48.1-48.3 and 49.1-49.2. (V2) pages 41-42, paras 27.1-27.9 refers).
- h) **Visitor Entrance Image Display system:** The visitor door entry system should provide colour images and audio communications linked to the main reception, which should incorporate a battery backup facility, enabling the system to operate for up to six hours in the event of power failure. Further information can be found at [https://www.bsia.co.uk/Portals/4/Publications/132-specifiers-guide-access-control-systems\[1\].pdf](https://www.bsia.co.uk/Portals/4/Publications/132-specifiers-guide-access-control-systems[1].pdf)
- i) Access to areas such as offices, stores and the plant room should be restricted to those staff with a genuine need to enter. Management procedures must be in place to always ensure the security of the building, Further guidance can be obtained from the British Security Industry Association (BSIA) regarding access control to the healthcare sector. [https://www.bsia.co.uk/Portals/4/Publications/ac\\_for\\_healthcare\\_final.pdf](https://www.bsia.co.uk/Portals/4/Publications/ac_for_healthcare_final.pdf) (Paras 1.5, SBD Homes 2023 refers).
- j) **Reception Areas** should be open and provide maximum surveillance for staff. (See SBD Commercial 2023, Paras 45.1-45.5, Paras 46.1-46.5 and 47.1-47.7).
- k) **Permeability** via pedestrian access points should be removed or kept to a minimum.
- l) **CCTV:** It is strongly recommended that a CCTV system should be installed to cover, as a minimum all external entrance points, the drugs stores, areas where valuables are stored, the parking area and cycle storage areas. See SBD Commercial 2023, Paras 35.1-35.13.
- m) **Alarms:** The main care home building should be alarmed and it is recommended that all ground floor door are also alarmed. See SBD Commercial 2023, Paras 54.1-54.2.
- n) **Mail Delivery:** Procedures must be in place to ensure secure mail delivery to residents, both for the care home and the other properties. It is assumed in the case of the care home that post would be delivered to the admin office or reception and distributed by staff. It is recommended that rather than individual letter boxes for apartments that there is a secure communal mailbox area at the front of each block, negating the need for post or fliers to be delivered within any of the complexes. (SBD Commercial 2023, Paras 53.1-53.6Homes 2019 (V2) pages 34-36, paras 21.27-21.35 refers).
- o) **Secure storage and an auditable process for cash handling** must be in place for securing staff and residents' valuables. See SBD Commercial 2023, Paras 58.1-58.3.

- p) **Bicycle and Mobility scooter storage** area should comply with SBD Commercial 2023 Paras 32.1-32.10, Paras 85.1-85.4 and Paras 86.1-86.9.
- q) **External Bin Storage** should comply with SBD Homes 20 (V2) page 68, paras 56.1-56.2).
- r) **Avoiding Door Recesses** that could shield an offender from view as outlined, see SBD Commercial 2023, Paras 89.1-89.2.
- s) **Maintenance and Management** programmes for the upkeep of grounds and gardens should be agreed. Planting should not impede the opportunity for natural surveillance and must avoid the creation of hiding places. Shrubs should be low growing with a mature growth height no higher than 1 m, to prevent hiding places for offenders and trees should have no foliage, epicormics growth or lower branches below 2m thereby allowing a 1m clear view. Building frontages should be open to view and attention should be given to the location of walls/hedges so that they do not obscure doors/windows/lights or CCTV cameras or the position of trees to allow for climbing aids into the property or grounds. See SBD Commercial 2023, Paras 70.1-70.2.
- t) **Lighting** around the parking areas and footpaths should comply with BS 5489: 2020. Dusk to dawn lighting should be installed around the area to illuminate all possible entry points. **The side of the buildings must also have LED economy photocell dusk to dawn lighting that meets BS5489:2020** see <https://www.theilp.org.uk/documents/crime/lightingagainstcrime.pdf> See SBD Commercial 2023, Paras 34.1034.2 and Paras 99.1-9.6, along with Section 1, SBD Sheltered Accommodation 2004.
- u) **Avoid Cyber Crime** by securing internet connections and Smart Devices. For more information see SBD Commercial 2023, Paras 36.1-36.2 and [Secured by Design - SBD Internet of Things \(IoT\)](#)
- v) **Signage:** As the control of access around the site is paramount, good signage is needed to regulate where visitors should travel around the area and where they should initially report too, to avoid anyone trying to pretend they didn't know where to go. Give clear guidance where to report to e.g., **"all visitors should report to reception"** with good route guidance as to the directions visitors should follow to get to this location. See SBD Commercial 2023, Paras 79.1-79.3.

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

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

**As 'crime' has a potentially adverse economic, social and environmental impact upon a development, the National Planning Policy Framework requires that crime and the fear of crime should not undermine quality of life or community cohesion and 'crime risk' should be afforded due consideration within the Design Access Statement (DAS), or any other similar supporting document.**

Further information on SBD and the tested and police approved home security building products can be found at [www.securedbydesign.com](http://www.securedbydesign.com)

The Secure By Design website also offers an interactive visual commercial business walk through that highlights best practice advice that should be adopted for any business complex. See [Secured by Design - Interactive 3D Design Guide](#)

**Suffolk Police also provide an interpretation of the basic Principles of Secured by Design (SBD) outlined in their "Residential Design Guide" at [Design Guide New Format \(suffolk.police.uk\)](http://Design Guide New Format (suffolk.police.uk)) and further information on SBD can be found at SBD Commercial 2023, Paras 1.1-1.4 and Paras 2.1-2.3**

**Secured by Design works to deter criminal and anti-social behaviour through the design, layout and specification of buildings and the spaces around and between them, that serve to reduce easy opportunities for crime. It is argued that more crimes are committed where a criminal feels more comfortable committing them, for instance where a physical environment offers easy unrestricted or at least uncontrolled access, where clear messages of ownership are absent, where either natural and formal surveillance are absent or where wrong doers feel free to move within an area assured of their anonymity.**

**An obvious advantage of creating spaces with clear sight lines across and around them which do not provide places where anyone can hide, is the fact that people can see for themselves they are safe moving through an area, reassuring them.** The Police (SBD) are also aware that **due consideration should be given to not creating additional barriers for disabled and/or older users.** Taking an inclusive design approach which aims to remove barriers that create undue effort and separation will ensure that buildings, places and surrounding spaces can easily and comfortably be accessed and used by everyone.

It would be good to see the development built to Secured by Design (SBD) gold, silver or bronze certification. To apply for an SBD award, please complete the checklist and application form that can be downloaded by visiting: [COM23\\_APP-compressed.pdf \(securedbydesign.com\)](https://www.securedbydesign.com/COM23_APP-compressed.pdf) and looking at SBD Commercial Paras 3.1- 3.3, Paras 4.1-4.4, Paras 5.1-5.2 and Paras 6.1-6.3. Completed application forms should be E-mailed to the relevant Design Out Crime Officer (DOCO) covering this area. DOCO details can be found on the SBD contacts page at <https://www.securedbydesign.com/contact-us/national-network-of-designing-out-crime-officers#suffolk-constabulary>

Unfortunately, there are many crimes which occur during the construction phase of a development; the most significant include theft of plant equipment, materials, tools and diesel fuel. Mobile or part time CCTV systems can be used as an effective aid to the security of a site and can act as a deterrent to criminal activity. Another major security site measure could include the use of a PID system which is a police, Secure By Design deterrent owned by “Deter Tech” formerly known as “SmartWater” that combines recording movement and immediately relaying it to a monitoring centre, that allows the monitor to have a two way conversation with the offender on site, along with a loud alarm system and high density lighting system, for further details see: [DeterTech: Intelligence-Led Security Solutions](https://www.deter-tech.com/)

## 5.0 REFERRALS

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

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

**5.3 The Suffolk Design Guide for Residential Areas- Shape of Development – (Design Principles Security)** Looking at the careful design of a new development regarding landscaping, planting and footpaths.

**5.4 Department for Transport – Manual for Streets (Crime Prevention)** The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians.

**5.5 Security Overlay to the RIBA Plan of Work, dated at** [Security Overlay to the RIBA Plan of Work \(architecture.com\)](https://www.architecture.com/resources/Security-Overlay-to-the-RIBA-Plan-of-Work)

## 6.0 CRIME STATISTICS FOR POST CODE IP30 9EH LOCAL AREA

The crime figures have been obtained from the Suffolk Police Crime computer base and the National Police Crime Mapper web site for the area pictured right are enclosed below. The Police Crime Mapper Web site is available for any member of the public to view using the following link: [Mid-Suffolk - North and East | Police.uk \(www.police.uk\)](https://www.police.uk/) and [Overview - Ward | Elmswell & Woolpit | Report Builder for ArcGIS \(suffolkobservatory.info\)](https://www.suffolkobservatory.info/)



Offence	July 2023	Aug 2023	Sept 2023	Oct 2023	Nov 2023	Dec 2023
Burglary/Theft				2		1
Robbery						
Vehicle Crime	4	2			1	
Criminal 12 Damage/Arson			1	2	3	7
ASB/Public 18 Order/Harrasmt		3	1		1	1
Violent & Sexual Offences 15	4	5	12	9	5	14
Shoplifting	2	1				
Drugs					1	1
Other Offences	1		3	2	1	4
Grand Totals	11	10	17	15	12	28

**6.1 The graph left indicates a breakdown of the offences committed around this area between 1<sup>st</sup> July to 31<sup>st</sup> December 2023, totalling 93 offences, the majority relating to Violent and Sexual offences, which totalled 49 incidents. Followed by Criminal Damage offences, which totalled 13 offences.**

**6.2 Crimes of note that have historically occurred within the local area, include nuisance behaviour relating to youths knocking on doors and running away and hanging baskets being damaged. Along with criminal damage to vehicles, vehicle interferences and theft from vehicles that have included catalytic converter thefts. Along with incidents of theft/damage from the local allotments and community woods area, both on Church Road. There have also been a number of burglaries and a few assaults within the local area.**

## 7.0 FINAL CONCLUSION

As Initially stated, the police cannot at this stage confirm support for this development until further information is forthcoming within the latter Reserved Matters stage. The current concerns are:

- How the northern area of this development and the current residential planning ref: DC/23/1615 are opening the area to more activity around the nearby railway line, which could result in damage and injury to life (Referred to at page 1, number 2 and Para 1.2).

- b) Similarly, the underside of the railway bridge within this local area is a concern, as they are known crime generators, allowing an offender to hide from view** (Referred to at page 1, number 1 and Para 1.3).
- c) There needs to be a good secure perimeter all around the development to make residents feel safe and not fearful of crime** (Referred to at page 1, number 3 and Paras 1.3-1.11).
- d) I have concerns as to whether there will be sufficient parking around the whole development, for residents, their visitors and staff** (Referred to at page 1, number 4 and Para 1.2).
- e) All properties need to have good physical security** (Paras 1.13-1.14 refer).
- f) Communal doors need to have good security, as once inside, an offender has free reign around the inside of a site. The main entrance for the care home should have an air-lock double door system to prevent tailgating and a logging system** (Para 1.15 and Para 3.2c refer).
- g) The communal entrance for the care home needs to have as part of the access control a colour visitor entry monitor for visitors to be identified and a logging unit to record the details of when visitors attend the area** (Para 1.16 and Para 3.3h refer).
- h) The main care home should be alarmed and preferably all ground floor doors to alert staff if doors have been left open, particularly during the warm summer months** (Para 1.16 and Para 3.3m refer).
- i) The clubhouse needs to be properly securable, especially if alcohol will be stored** (Referred to at page 1, number 5 and Para 1.7).
- j) The area will have numerous paths, which is a concern, the police prefer few methods of access to reduce movement for offenders** (Referred to at page 1, number 6 and Para 1.5).
- k) There needs to be strong security for medical rooms and drug storage areas** (Referred to at page 1, number 7 and Paras 2.0-2.6).
- l) The design will include a growing area and community orchard, which usually lead to incidents of antisocial behaviour, from offenders throwing upending produce and throwing them around the area, leading to criminal damage, particularly to windows. If such areas are incorporated, they need to be near to areas where there will be active surveillance to deter such actions** (Referred to at page 1, number 8 and Para 1.18).
- m) The Care Home needs to have an alarm and preferably all ground floor doors alarmed too.** It is strongly recommended that CCTV is installed to cover, as a minimum all external entrance points, the drugs stores, areas where valuables are stored, the parking area and cycle storage areas (Para 3.2 ref "L" and "M" refer).
- n) The design should look at CPTED 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** (Paras A1-A2 refer).
- o) Mail delivery and parcel drop off needs to be secure to prevent theft and possible ID theft** (Para 3.2 ref "N" refers).
- p) There needs to be secure storage for mobility scooters, bicycles and waste bin storage** (Para 3.2 ref "P" and "Q" refer).
- q) There needs to be clear signage around the site where visitors should report too and areas that are private for residents only** (Para 3.2 ref "V" refers).

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

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

Yours sincerely

Phil Kemp

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



**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Sent:** 05 Mar 2024 04:58:39  
**To:**  
**Cc:**  
**Subject:** FW: DC 23 05651 Elmswell further submission  
**Attachments:**

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**From:** Paul Harrison <Paul.Harrison@baberghmidsuffolk.gov.uk>  
**Sent:** Tuesday, March 5, 2024 4:58 PM  
**To:** Daniel Cameron <Daniel.Cameron@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Subject:** DC 23 05651 Elmswell further submission

BMSDC Heritage consultation response

Daniel

The agent has submitted 'Heritage Notes'. There is no amendment to the proposal. The letter states that it is neither duplicating material already submitted, nor submitting additional information, so on the face of it there is nothing requiring further comment from Heritage Team and no reason to alter our initial response. In fact the letter does go on to paraphrase parts of the Heritage Statement.

The agent points out that the rating of the level of harm to the Church given by Historic England is different from the rating of harm given in our own response. Historic England is the government's lead agency on heritage matters with a statutory remit to offer guidance to LPAs on proposals affecting (among other things) heritage assets designated at higher grade. You might therefore consider whether in this instance their nationwide remit and their focus on higher-grade assets might make their advice particularly robust.

The agent raises the question of the 'clear need for this type of development in this location'. As you are aware, we normally defer to the judgment of planning colleagues on such matters in their 'planning balance' exercise, but since the agent includes it in the 'Heritage notes' I offer the following observations:

- the inclusion of this argument in the heritage submissions suggests a lack of appropriate detachment in the application's assessment of heritage significance and impacts; the argument properly belongs in the planning balance exercise, and to advance it to the heritage assessment would be begging the question;
- this application follows closely an application for residential development over a larger site including the present site, and the question inevitably arises why the need was not so clear on that occasion that this type of development should be included in that proposal, or indeed in any of the numerous recent proposals for large residential developments in Elmswell;
- what is the location? the present application site is unoccupied and has no such need, so presumably the need relates to a wider catchment area. The justification should include explanation of all sites appraised, and why this one was considered the least harmful in heritage terms. The ruling in the Forge Field case tells us that the statutory duties relating to designated heritage assets imply a sequential test leading to refusal of any but the least harmful option;
- similarly, the proposal is not for a 'type' of development but for a very specific use and very specific built development; justification should explain why this specific proposal is made at this specific site; anything less should not be considered 'clear and convincing'.

Beyond these points I would refer you to my initial response.

Paul

**Paul Harrison**  
Principal Heritage Officer  
Babergh and Mid Suffolk District Councils  
T 01449 724677

*PLEASE NOTE – my work pattern is Mondays, Tuesdays and Fridays only.*

E [paul.harrison@baberghmidsuffolk.gov.uk](mailto:paul.harrison@baberghmidsuffolk.gov.uk)  
E [heritage@baberghmidsuffolk.gov.uk](mailto:heritage@baberghmidsuffolk.gov.uk)  
W [www.babergh.gov.uk](http://www.babergh.gov.uk) | [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

## Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Sent:** 07 Mar 2024 02:31:53  
**To:**  
**Cc:**  
**Subject:** FW: 2024-03-07 JS Reply Land To The North And West Of, School Road, Elmswell, Suffolk Ref DC/23/05651 - OUT  
**Attachments:**

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**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>  
**Sent:** Thursday, March 7, 2024 2:04 PM  
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Cc:** Daniel Cameron <Daniel.Cameron@baberghmidsuffolk.gov.uk>  
**Subject:** 2024-03-07 JS Reply Land To The North And West Of, School Road, Elmswell, Suffolk Ref DC/23/05651 - OUT

Dear Daniel Cameron,

Subject: Land To The North And West Of, School Road, Elmswell, Suffolk Ref DC/23/05651 - OUT

The LLFA **maintains its previous holding objection**, on the grounds that the applicant has not provided the required information/evidence as detailed in our consultation reply dated the 12/12/2023

Kind Regards

Jason Skilton  
Flood and Water Engineer  
Suffolk County Council

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

From: [planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk) <[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)>  
Sent: Monday, March 4, 2024 9:41 AM  
To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
Subject: MSDC Planning Re-consultation Request - DC/23/05651 - OUT

Please find attached planning re-consultation request letter relating to planning application - DC/23/05651 - Land To The North And West Of, School Road, Elmswell, Suffolk

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.  
For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.



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

10/04/2024

For the attention of: Daniel Cameron

**Ref: DC/23/05651; Land To The North And West Of, School Road, Elmswell, Suffolk**

Thank you for reconsulting us on Outline Planning Application (Access to be considered, all other matters reserved) - Erection of Care Village comprising 66 bedroom care home (C2 Use), 40 No. Extra Care Bungalows (C2 Use), Management Office (E(g)(I) Use), Club House, Community Growing Area, Orchard, Community Bee hives and Open Space Provision.

We have reviewed the documents submitted on the 21<sup>st</sup> March in relation to our previous comments.

It is noted that an updated LVIA has not been submitted, and a technical note has been provided to address our previous comments. The illustrative landscape masterplan provided (dwg no. P22-1167\_EN\_0009\_D\_A3 P) has also not been updated from the proposed site plan shown previously other than the addition of some SuDS details.

Therefore, our comments remain the same as before and with the current layout from a landscape perspective we are unable to support the principle of the development.

We trust the above is helpful. If you have any queries regarding the matters raised above, please let me know.

Yours sincerely,

Kim Howell BA (Hons) Dip LA CMLI  
Senior Landscape Consultant

**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.