

PLANNING COMMITTEE – 24 August 2016

APPLICATION NO DC/16/2157/FUL

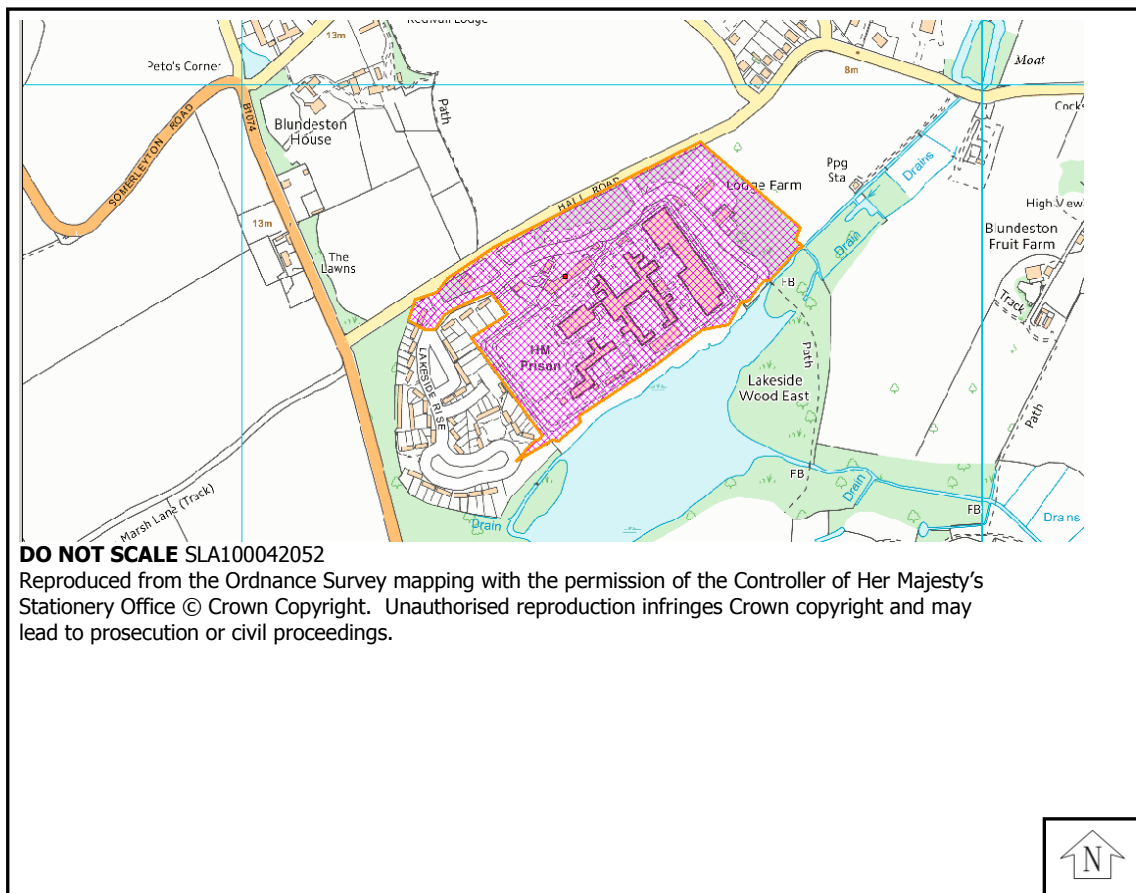
LOCATION

Former H M Prison Blundeston
Lakeside Rise
Blundeston
Lowestoft
Suffolk
NR32 5BG

EXPIRY DATE 17 August 2016
APPLICATION TYPE Full Application
APPLICANT Badger Building (E. Anglia) Ltd

PARISH Blundeston

PROPOSAL Hybrid planning application for demolition of prison and construction of 2no shop units with 4no flats, and 3no office units with car parking, 16no affordable housing units (full submission), and residential development including care home, roads and open space (outline submission)



SUMMARY

- 1.1 Blundeston Prison closed in early 2014 and the site was sold by the Ministry of Justice – the Council was able to contribute to the information document for prospective purchasers. The site lies outside the physical limits of Blundeston, but is a large redundant brownfield site.

- 1.2 This application proposes redevelopment of the site for primarily residential development, although with two shop units and 3 office buildings to provide a modicum of employment uses.
- 1.3 The application has been submitted in hybrid form; full planning permission is sought for buildings located outside the main prison complex, namely the shops with flats above, the office buildings and a block of 15 affordable dwellings – an early start is anticipated for this development as demolition of existing buildings is not required.
- 1.4 Outline permission is sought for development of the larger area of the site including the prison buildings (demolition of which is proposed) and redevelopment for approximately 130 dwellings and a care home.
- 1.5 A member site visit took place on 8th August. The notes are attached at Appendix A.

SITE DESCRIPTION

- 2.1 The site is accessed from Hall Road, from which there are currently three accesses. To the west there are a number of former prison officer's dwellings, which are in separate ownership and are not included in the application site. There is a lake to the south of the site.
- 2.2 The application site is essentially in two parts; the main prison buildings are within the secured area which is enclosed by a high fence. However closer to Hall Road there are some existing buildings. One of these is the former prison officer's club which is now used as a day nursery.
- 2.3 The site lies beyond the physical limits for Blundeston identified in the Proposals map – the site boundary is approximately 100 metres from the physical limits boundary at the closest point.
- 2.4 The lake and surrounding woodland are identified as a County Wildlife Site.
- 2.5 The whole site has an area of 9.69 ha (23.95 acres).

PROPOSAL

- 3.1 As noted in the introduction the application has been submitted in hybrid form, with full planning permission sought for the part of the development proposed outside the "secured area" of the prison and outline permission sought for the redevelopment of the prison itself.
- 3.2 The development proposed in phase one comprises:
- 3.3 Two shops with 4 x one bedroom flats above, on the site of an existing building adjacent to the former prison officer's dwellings. 10 parking spaces are proposed adjacent to Lakeside Rise, with four parking spaces for the flats.
- 3.4 3 office buildings, in a location close to the current main entrance to the site. Each has two floors with a total floor area of 322.4 sq.m.
- 3.5 14 starter homes. These are proposed in the form of a block adjacent to the existing housing area and are in the form of a terrace, which is part two storey with a central element of three storeys with an archway through to a rear parking yard.

- 3.6 The accommodation proposed comprises six two bedroom houses, three in each two storey “wing” and eight one bedroom flats, two on the ground floor and three each on the first and second floors.
- 3.7 Parking is proposed in the rear yard (20 spaces). In addition there are two buildings in the rear yard each including three garages with a one flat above.
- 3.8 Phase two is the outline application, primarily related to the “secure” area of the site. This proposes 130 dwellings and a care home, the latter located on what is currently the artificial sports pitch. An illustrative masterplan and some indicative dwelling types have been submitted.

CONSULTATIONS/COMMENTS

- 4.1 **Neighbour consultation/representations:** 4 representations have been received, as follows:
- 4.2 Mr & Mrs Boswell, 18 Lakeside Rise: the siting of the shops will cause congestion on Lakeside Rise. The shops would be better used for housing with the shops relocated to the office site.
- 4.3 Mrs Oldman, 17 Lakeside Rise: The plan shows the shops at the immediate entrance to Lakeside Rise. I would like to raise a number of objections to the siting of shops and suggest this is not the appropriate location for the following reasons:
- With a number of supermarkets which are open with extended hours, I question the need and sustainability of shops being included in this development
 - The entrance to Lakeside Rise is not a particularly wide access road and added traffic will cause congestion problems for vehicles moving in and out of the estate.
 - There does not seem to be car parking arrangements on the plan for the shops, and as space would be limited for parking on the available plot of land, it would mean that shoppers would park alongside the existing residences causing inconvenience.
 - The plot of land proposed for the shops would be better used for a new home in keeping with style of the established residences in the immediate area.
 - The shops could be located at a point where all residents would access them near the main entrance to the old prison site.
- Further observations to the plans: a) The proposed Pre-School building is too close to the main road with very limited outside space for children for playing and fresh air and the boundary perimeter is dangerously near to where vehicles would be travelling.
- b) I was under the impression that the existing football and sports area was to be retained for the use of local community. This area appears to be wholly taken with plans for a care home (which I agree will be necessary for the area) but question the exact location of this in the plans given the aforementioned presumption.
- c) In respect of the Lake, other than a cycle path, I am unable to see specific mention of direct public access, rights of way and options for fishing which could be of interest to residents both new and existing.
- 4.4 Mr & Mrs Larcombe, Woodstock, Lowestoft Road: I have looked at the proposed development plan and my only concern is where the shop units are going to be, I feel this will cause to much traffic congestion on that corner and not enough parking for the cars using the shops. I feel the shops would be better situated away from the main road.
- 4.5 Mr & Mrs Symonds, 2 Lakeside Rise (summarised): considers that the proposal is in direct contradiction of policies DM02 – it does not respect the local context or street pattern or the scale and proportions of surrounding buildings. Three storey building is taller than the surroundings and out of keeping with existing buildings and the wider street scene. The mass and bulk would represent an unneighbourly form of development that would be overbearing and intrusive.

- 4.6 The size, height and massing would have an unacceptable impact on surrounding properties.
- 4.7 The development would cause overshadowing and loss of light.
- 4.8 Fails to comply with government policy on protection of the countryside and design.
- 4.9 The development will cause unacceptable loss of privacy and overlooking – could be contrary to the Human Rights Act.
- 4.10 Draws attention to the need to take account of crime prevention and suggests re courtyard area should be reconsidered.
- 4.11 Landscaping proposed is inadequate.
- 4.12 Considers that the proposal represents overdevelopment. Considers that affordable housing should be integrated throughout the development not crammed into a courtyard format.
- 4.13 Requests conditions on hours of work during construction.
- 4.14 **Blundeston Parish Council Comments:** recommend approval

Consultees

- 4.15 **SCC Development Contributions Manager:** I refer to the hybrid planning application for the demolition of prison and construction of 2 x shop units with 4 number flats, and 3 number office units with car parking, 15 number affordable housing units (full submission), and residential development including care home, roads and open space (outline submission). This is a total of 130 dwellings.
- 4.16 The Waveney District Council Core Strategy was adopted in January 2009. It includes the following objectives and policies relevant to providing infrastructure:
 - Objective 7 seeks to achieve more sustainable communities by ensuring facilities and services are commensurate with development. This is implemented through Policy CS04, which states that developer contributions will be sought to fund service provision, where appropriate.
- 4.17 Community Infrastructure Levy. The Waveney District Council CIL Charging Schedule was formally adopted on 22nd May 2013, with the charges coming into effect on all planning decisions taken from 1st August 2013.
- 4.18 Waveney District Council 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 Waveney 123 List, dated May 2013, includes the following as being capable of being funded by CIL rather than through planning obligations:
 - Strategic highway improvements
 - Provision of cycling and pedestrian infrastructure
 - Provision of library facilities
 - Provision of off-site open space
 - Provision of 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
 - Provision of police infrastructure
 - Provision of health facilities

- 4.19 Whilst most infrastructure requirements will be covered under Waveney'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.
- 4.20 Site specific matters will be covered by a planning obligation or planning conditions. The County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider.
- 4.21 The adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' sets out how contributions are assessed and calculated.
- 4.22 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'.
- 4.23 The NPPF in 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.'
- 4.24 SCC anticipates the following minimum pupil yields from a development of 130 dwellings, namely:
- a. Primary school age range, 5-11: 33 pupils. Cost per place is £12,181 (2016/17 costs).
 - b. Secondary school age range, 11-16: 23 pupils. Cost per place is £18,355 (2016/17 costs).
 - c. Secondary school age range, 16+: 5 pupils. Costs per place is £19,907 (2016/17 costs).
- 4.25 The local catchment schools are Blundeston CEVCP School and Benjamin Britten High School. At the primary school level SCC currently forecasts that there will not be sufficient surplus capacity to accommodate any of the pupils arising. SCC will therefore be seeking CIL funding for the 33 pupils forecast to arise from the development at a minimum total cost of £401,973 (2016/17 costs).
- 4.26 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 13 pre-school pupils. The developer is proposing to create space within the scheme to lease to the current local childcare provider. Any under provision in the locality may require future CIL funds based on £6,091 per place i.e. £79,183 (2016/17 costs).
- 4.27 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. It is likely to impact on the infrastructure required of this site. 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.
- 4.28 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.

- 4.29 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 Andrew Pearce.
- 4.30 Site specific highway mitigation measures will need to be secured by appropriate planning conditions or planning obligations.
- 4.31 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.
- 4.32 5. Libraries. The National Planning Policy Framework (NPPF) Chapter 8 talks about the importance of 'Promoting healthy communities', particularly paragraphs 69 & 70. Paragraph 69 states that "the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities".
- 4.33 Paragraph 70 talks about the need to deliver the social, recreational and cultural facilities the community needs by planning positively for community facilities such as cultural buildings to enhance the sustainability of communities and residential environments; and to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. There is also the need to ensure that facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.
- 4.34 The adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' and the supporting 'Libraries and Archive Infrastructure Provision' topic paper sets out the general approach to securing library developer contributions. The Department for Culture, Media and Sport (DCMS) previously published national standards for library provision and used to monitor Library Authorities' performance against the standards. Whilst these national standards are no longer a statutory requirement they form the basis for Suffolk County Council's in-house standards, which form the basis of the contract with Suffolk Libraries. The standard recommends a figure of 30 square metres per 1,000 population as a benchmark for local authorities; which for Suffolk represents a cost of £90 per person or £216 per dwelling based on an average occupancy of 2.4 persons per dwelling.
- 4.35 The capital contribution towards libraries arising from this scheme is £28,080, which would be spent on enhancing library facilities & services in the vicinity of the development.
- 4.36 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.

- 4.37 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:
- 4.38 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.
- 4.39 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.
- 4.40 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 population. 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.
- 4.41 8. Sustainable Drainage Systems. Refer to the NPPF 'Section 10 Meeting the challenges of climate change, flooding and coastal change'. On 18 December 2014 there was a Ministerial Written Statement made by The Secretary of State for Communities and Local Government (Mr Eric Pickles). The changes took effect from 06 April 2015.
- 4.42 "To this effect, we expect local planning policies and decisions on planning applications relating to major development - developments of 10 dwellings or more; or equivalent non-residential or mixed development (as set out in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010) - to ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.
- 4.43 Under these arrangements, 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."
- 4.44 The Minister announced on 18 December 2014 that sustainable drainage would be delivered through the planning system. This relies on the NPPF, the NPPG and Non-Statutory Technical Standards (technical standards) for sustainable drainage systems, produced and issued by Government. The 'Non-Statutory Technical Standards for Sustainable Drainage: Practice Guidance' supports the technical standards in question.
- 4.45 9. Fire Service. Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC strongly recommends 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.

- 4.46 10. Superfast broadband. 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 impacting property prices and saleability.
- 4.47 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).
- 4.48 This will provide a network infrastructure which is fit for the future and will enable faster broadband.
- 4.49 11. The above information is time-limited for 6 months only from the date of this letter. Apart from any site specific matters to be secured by way of a planning obligation or planning conditions the above will form the basis of a future bid to Waveney District Council for CIL funds if planning permission is granted and implemented.
- 4.50 **Suffolk Fire and Rescue Service:** The plans have been inspected by the Water Officer who has the following comments to make.
- 4.51 Access and Fire Fighting Facilities: Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.
- 4.52 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.
- 4.53 Water Supplies: The Suffolk Fire and Rescue Service recommends that a fire hydrant is installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for fire-fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.
- 4.54 Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.
- 4.55 **Natural England:** Thank you for your consultation. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.
- 4.56 No Objection. We are satisfied that this development is not likely to have a direct impact on designated sites. However, a common concern in relation to residential development is the issue of recreational disturbance impacts on designated sites. This is usually addressed through the provision of strategic measures provided as part of a local authority's core

strategy. In addition, where developments are within around 1-2km walking distance or 8km direct driving distance of designated sites, then we would expect there to be a site specific assessment of the likely recreational disturbance impacts as part of the planning application.

- 4.57 In this case, however, the development is greater than 8Km driving distance from designated sites, and therefore it is our advice that a site specific assessment is not necessary. We do, however, recommend that the potential wider recreational impact of increased housing provision within the district as a whole is assessed as part of the developing Waveney District Local Plan and that suitable mitigation is provided.
- 4.58 Protected species. Where there is a reasonable likelihood of a protected species being present and affected by the proposed development, the LPA should request survey information from the applicant before determining the application (Paragraph 99 Circular 06/05)1.
- 4.59 Natural England has produced standing advice, which is available on our website Natural England Standing Advice to help local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, local planning authorities should undertake further consultation with Natural England.
- 4.60 1 Paragraph 98 and 99 of ODPM Circular 06/2005. Local wildlife sites. If the proposal site is on or adjacent to a local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application.
- 4.61 Biodiversity enhancements. This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.
- 4.62 Landscape enhancements. This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.
- 4.63 We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.
- 4.64 **Forestry Commission** was consulted on the 31 May 2016.
- 4.65 **Suffolk County Archaeological Unit:** The proposed redevelopment of the former HMP Blundeston site will require the demolition of many of the extant prison buildings, which were erected in the 1960s and which have been a significant part of the local landscape for some fifty years. This site also lies in an area of archaeological potential recorded on the

County Historic Environment Record, specifically an area of recorded medieval earthworks (BLN 037), the site of the post-medieval Blundeston Lodge (BLN 021) and the site of a Second World War military camp (BLN 036). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

- 4.66 There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.
- 4.67 In this case, a programme of historic building recording and analysis should be undertaken of the former prison buildings so that a record of them is made before they are demolished. An archaeological evaluation will also be required to establish the potential of the site 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.
- 4.68 The following two conditions would be appropriate:
- 4.69 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.
- 4.70 2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.
- 4.71 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 Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).
- 4.72 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.

- 4.73 I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Waveney 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. Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>
- 4.74 **Environment Agency - Drainage** Thank you for consulting us on the above planning application.
- 4.75 Environment Agency position. We object to the application because the submitted Flood Risk Assessment (FRA) does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference ID: 7-030-20140306. In particular the FRA fails to fully consider the tidal and fluvial flood risk posed to the site. The submitted FRA does not, therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. We recommend that the application is not determined until a suitable FRA is submitted.
- 4.76 Before determining the application your Authority will also need to be content that the flood risk Sequential Test has been satisfied in accordance with current Government guidance within the National Planning Policy Framework (NPPF) if you have not done so already. As you will be aware, failure of the Sequential Test or either part of the Exception Test is sufficient justification to refuse a planning application.
- 4.77 The reason for this position, together with advice on flood risk and how to overcome our objection, is set out below.
- 4.78 Reasons - Fluvial/Tidal Flood Risk. The site is at risk from both fluvial and tidal flooding from the Blundeston watercourse to the south of the site and the Broads/River Waveney to the west. Our maps show the site lies partially within Flood Zones 1, 2 and 3 derived from the Broads 2008 modelling and from basic national generalised flood modelling (JFLOW). The proposal is for a mixed use development for the demolition of a prison and construction of 2 shop units with 4 flats, and 3 office units with car parking, 15 affordable housing units, and residential development including care home, roads and open space. The residential buildings and care home are considered to be more vulnerable and the office buildings are considered less vulnerable in line with Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance: Flood Risk and Coastal Change.
- 4.79 As you will be aware, before development can be permitted within Flood Zone 3 the proposal will need to satisfy the Sequential Test and both parts of the Exception Test. The requirement to apply the Sequential Test is set out in Paragraph 101 of the NPPF. The Exception Test is set out in paragraph 102. These tests are your responsibility and should be completed before the application is determined.
- 4.80 With regard to the second part of the Exception Test, we have reviewed the submitted FRA by Evans Rivers and Coastal Limited, referenced 1617/RE/05-16/01 and dated May 2016.
- 4.81 While we agree that the buildings have been sequentially sited outside of the Flood Zones it is important to note that the Environment Agency has not undertaken specific detailed modelling (with the exception of flood extents derived from JFLOW) of this section of Blundeston watercourse and, therefore, has no flood level data available for the fluvial flood risk from this watercourse. JFLOW outputs are not suitable for detailed decision making. In some places it can be seen that the flood extents do not follow the watercourse and therefore further investigation is needed.
- 4.82 Normally, in these circumstances, a modelling exercise will need to be undertaken when producing an FRA in order to derive flood levels and extents, both with and without allowances for climate change, for the watercourse, in order to inform the design for the

site (such as finished floor levels). Without this information, the risk to the development from fluvial flooding associated with the Blundeston watercourse is unknown.

- 4.83 Overcoming our objection. The applicant can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will be safe from flooding over its lifetime without increasing risk elsewhere. If this cannot be achieved we are likely to maintain our objection to the application. Production of a revised FRA will not in itself result in the removal of an objection. Further advice and guidance is available in the technical appendix at the end of this letter.
- 4.84 Advice to the LPA. We will maintain our objection until the applicant has supplied information to demonstrate that the flood risks posed by the development can be satisfactorily addressed. We would like to be re-consulted on any information submitted to address our concerns and we will provide you with bespoke comments within 21 days of receiving formal re-consultation.
- 4.85 If you are minded to approve the application at this stage contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009..
- 4.86 **Suffolk Wildlife Trust** was consulted on the 26 May 2016.
- 4.87 **Anglian Water** Section 1 - Assets Affected
- 4.88 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.
- 4.89 Section 2 - Wastewater Treatment.
- 4.90 2.1 The foul drainage from this development is in the catchment of Lowestoft Water Recycling Centre that will have available capacity for these flows.
- 4.91 Section 3 - Foul Sewerage Network.
- 4.92 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.
- 4.93 Section 4 - Surface Water Disposal
- 4.94 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.
- 4.95 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.
- 4.96 Section 5 - Trade Effluent.
- 4.97 5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be

included within your Notice should permission be granted. An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.

- 4.98 Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence. Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991.
- 4.99 **WDC Environmental Health - Noise** The EP team has no objections to the development, but because it is of a significant size with neighbouring residential receptors, it is appropriate to suggest a pair of conditions to lessen the impact on amenity.
- 4.100 Firstly, the burning of waste materials (including green waste) should be prohibited on site.
- 4.101 Secondly, no demolition and construction works shall take place until a site specific Environmental Management Plan has been submitted to and approved in writing by the LPA. The plan must demonstrate the adoption and use of the best practicable means to reduce the affects of noise, vibration, dust and lighting. The plan should include, but not be limited to:
- * Procedures for maintaining good public relations including complaint management, public consultation and liaison
 - * Arrangements for liaison with the Council's Environmental Protection Team
 - * All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the LPA, shall be carried out only between the following hours:
08:00 Hours and 18:00 Hours on Mondays to Fridays and 08:00 and 13:00 Hours on Saturdays and; at no time on Sundays and Bank Holidays.
 - * Deliveries of materials to and removal of plant and equipment, machinery and waste from the site must only take place within the permitted hours detailed above.
 - * Mitigation measures as defined in BS 5228: Parts 1 and 2: Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from the demolition and construction works.
 - * Procedures for the emergency deviation of the agreed working hours.
 - * Control measures for dust and other air-borne pollutants. This must also take into account the need to protect any local resident who may have a particular susceptibility to air – borne pollutants.
- Please note that Best Practicable Means (BPM) to reduce the noise impact upon the local community should include the following:
- All demolition and construction plant and equipment should comply with EU noise emission limits:
 - Proper use of plant with respect to minimising noise emissions and regular maintenance. All vehicles and mechanical plant used for the purpose of the works should be fitted with effective exhaust silencers and should be maintained in good efficient working order,;
 - Selection of inherently quiet plant where appropriate. All major compressors should be 'sound reduced' models fitted with properly lined and sealed acoustic covers which should be kept closed whenever the machines are in use and all ancillary pneumatic percussive tools should be fitted with mufflers or silencers of the type recommended by the manufacturers:
 - Machines is intermittent use should be shut down in the intervening periods between work or throttled down to a minimum:
 - Plant and equipment such as flatbed Lorries, skips and chutes should be lined with noise attenuating materials. Materials should be handled with care and placed, not dropped.

- 4.102 **Police - Alan Keely Crime Reduction:** Thank you for the opportunity to comment on the above planning application.
- 4.103 On a development of this type and size I would strongly recommend that an application for Secured by Design approval is made.
- 4.104 An early input at the detailed design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.
- 4.105 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.
- 4.106 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.
- 4.107 Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.
- 4.108 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'.
- 4.109 The new "Homes 2016" guide referred to in this response is available from www.securedbydesign.com which explains all the crime reduction elements of the scheme.
- 4.110 My specific concerns in respect of this phase of the proposed development are as follows:
- 4.111 In respect of the starter homes there are a number of areas which cause concern.
- 4.112 Rear Footpaths. The Secured by Design Document "Homes 16" advises against footpaths to the rear of properties. The recommendation, if they are essential, is that they must be gated and that the gates should be placed at the entrance to the footpath, as near to the front building line as possible so that attempts to climb them will be in full view of the street. The gates should also have a key operated lock. In my opinion the current layout would not lend itself to this.
- 4.113 I am also concerned about the apparent paths to either side of the development which appear to provide a concealed access or escape route to and from the development.
- 4.114 I would further recommend that the design of the bin and cycle stores be reconsidered to avoid creating a further rear footpath with little natural surveillance.
- 4.115 Fences. There is insufficient detail to comment on fencing but my advice would again be to follow the guidelines in Homes 16.
- 4.116 Lighting. Again the proposals for lighting are not clear but I would recommend that lighting for this development be designed to BS 5489:2013 (Note 18.1) to ensure that an overall uniformity of light level is achieved.
- 4.117 All properties should benefit from dusk to dawn lighting on all elevations where there is an external door-set.
- 4.118 I would also specifically request that the underpass to the courtyard area be well lit.

- 4.119 Parking. Rear car parking courtyards are discouraged for the following reasons:
- 4.120 They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated. This is often exacerbated where lighting is insufficient and can increase the fear of crime.
- 4.121 Un-gated courtyards also provide areas of concealment which can encourage anti-social behaviour.
- 4.122 Because of the above comments I would object to this area of the development and recommend a rethink of the design and possibly the consideration of a conventional cul de sac rather than a courtyard design.
- 4.123 In respect of the shop units with flats over my comments are as follows:
- 4.124 Communal access. I would ask that the guidance provided in Section 27 of Homes 16 be adopted for the communal entrances of the flats over the shops, in particular door sets, locksets, door entry systems and communal mail arrangements.
- 4.125 Parking to rear. There appears to be good natural surveillance to the rear courtyard parking area but I would advise that lighting to BS 5489:2013 be provided in this location. In addition, if this area is specifically for the residents of the flats, gates should be provided at the entrance of the parking area.
- 4.126 Fencing. As before in respect of fencing my advice would again be to follow the guidelines in Homes 16
- 4.127 In respect of the office development my comments are as follows:
- 4.128 General Security. This is an area where specific security considerations should be considered as these buildings are likely to be uninhabited outside normal working hours. This would include approved alarm systems and potentially CCTV.
- 4.129 Fences. Fencing to the rear of the offices should be of an appropriate design to deter access in accordance with SBD recommendations. Again there are design considerations but potentially fences could be steel weldmesh or palisade to a height of 2.0 m. This is particularly important as the natural surveillance to the rear elevations appears to be compromised by the existing trees.
- 4.130 Lighting. The rear of the offices should be well lit at all times.
- 4.131 Could I also take this opportunity to remind you of the following Design Principles.
- 4.132 1 Waveney Planning Design Principles: DMO2 - states that developers should "take into account the need to promote public safety and deter crime and disorder through careful layout and design of buildings, car parking areas, landscaping, public spaces and pedestrian routeways";
- 4.133 Waveney's Development Policy also states that developments should be safe and take account of crime prevention and community safety considerations. Developers should therefore ensure that 'Secured by Design' principles are incorporated within all schemes.
- 4.134 This will require particular consideration to the layout of the development to allow for effective natural surveillance and supervision of public areas. Where appropriate, public areas should be clearly visible from adjoining buildings and the design and landscaping should provide for clear sight-lines on public routes (paths, cycle ways etc.) and not create unnecessary concealed areas.

- 4.135 Using these nationally recognised standards as design benchmarks can often result in a more secure and safe development without placing a financial burden on the developer.
- 4.136 Other recommendations relating to Secured by Design include:
- 4.137 2 Suffolk Design Guide for Residential Areas- Shape of Development - Design Principles
- 4.138 Security. 3.17.1 The Town and Country Planning (Development Plans) Regulations require local planning authorities to have regard to social considerations in preparing structure plans and unitary development plans. Crime Prevention must be regarded as one of these social considerations.
- 4.139 3.17.2 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.
- 4.140 3.17.3 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.
- 4.141 Secured By Design. 3.17.7 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 Designing out Crime Officer.
- 4.142 3 Section 17 of the 'Crime and Disorder Act 1998'. This part of the CDA places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.
- 4.143 Despite other legislative considerations within the planning process, there is no exemption from the requirement of Section 17 as above. Reasonable in this context should be seen as a requirement to listen to advice from the Police Service (as experts) in respect of criminal activity. They constantly deal with crime, disorder, anti-social acts and see on a daily basis, the potential for 'designing out crime'.
- 4.144 This rationale is further endorsed by the content of PINS 953.
- 4.145 4 National Planning Policy Framework. Paragraph 58 states:-
- 4.146 "Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion".

- 4.147 Paragraph 69. This paragraph looks towards healthy and inclusive communities. The paragraph includes:-
- 4.148 "Planning policies and decisions, in turn, should aim to achieve places which promote: Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion"
- 4.149 5 Department for Transport - Manual for Streets
- 4.150 4.6 Crime Prevention
- 4.151 4.6.1 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, 7 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 and crime prevention officers, as advised in Safer Places. (In Suffolk these are now called Designing Out Crime Officers)
- 4.152 4.6.2 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.
- 4.153 4.6.3 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).
- 4.154 I hope you will consider this advice when making your decision in respect of this application.
- 4.155 **SCC Flooding Authority** Suffolk County Council, Flood & Water Management can make the following initial comment at this stage.
- 4.156 Suffolk County Council, Flood & Water Management require a surface water drainage strategy to be submitted in accordance with the Suffolk Flood Risk Management Strategy, appendix A.
- 4.157 Please ensure all documents listed on page 8 are provided.
- 4.158 <https://www.suffolk.gov.uk/assets/Roads-and-transport/Flooding-and-drainage/Strategy-Appendices/2016-04-SuDS-Guidance-Appendix-A-v12.pdf>

- 4.159 In addition the following observations on the site are applicable:
- 4.160 • A ground investigation has not been submitted with the application, given the historic use of the site there is a possibility of contaminants being present. Before determining whether infiltration can be used, the risk of pollution from infiltrating polluted surface water runoff from the site must be assessed.
- 4.161 • Infiltration tests have only been conducted in the northern part of the site, can these tests be provided for the whole application site?
- 4.162 • Infiltration tests have been submitted but no indication on the method used has been provided.
- 4.163 **NHS Great Yarmouth And Waveney Clinical Commissioning Group** was consulted on the 26 May 2016.
- 4.164 **Suffolk County - Highways Department** Notice is hereby given that the County Council as Highway Authority make the following comments:
- 4.165 The description given in the proposed development is misleading because it makes no mention of a total of 130 residential dwellings. For a development of this scale we require a Transport Assessment to consider the impact of the traffic generated from the new site and consider ways to mitigate the impact on the highway network. There is also a need to provide a Travel Plan to encourage residents to make sustainable travel choices where possible to reduce the impact of the site where possible.
- 4.166 Without further information to address the issues raised above I would recommend that this application was refused on the grounds that there is insufficient information to assess the Highways impact of this proposal.
- 4.167 **Suffolk County - Rights Of Way** Thank you for your consultation regarding the above planning application.
- 4.168 Please accept this email as confirmation that we have no comments or observations to make in respect of this application affecting any public rights of way.
- 4.169 Please note, there may also be public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.
- 4.170 **Waveney Norse - Property and Facilities** were consulted on the 26 May 2016.

PUBLICITY

4.171 The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Major Application,	03.06.2016	23.06.2016	Beccles and Bungay Journal
Major Application,	03.06.2016	23.06.2016	Lowestoft Journal

SITE NOTICES

4.172 The following site notices have been displayed:

General Site Notice

Reason for site notice: Major Application, Date posted
09.06.2016 Expiry date 29.06.2016

PLANNING POLICY

- 5.1 The Waveney Core Strategy was adopted in 2009. Policy CS01 sets the spatial strategy for the District. Policy CS02 seeks high quality and sustainable design. Policy CS11 deals with housing and policy CS14 Culture (including open space).
- 5.2 The Development Management Policies were adopted in 2011. Policy DM01 sets physical limits for some settlements. Policy DM02 sets design principles. Policy DM16 considers housing density, policy DM17 housing type and mix and DM18 affordable housing. Policy DM22 deals with housing in the rural area. Policy DM25 considers open space and DM29 protection of biodiversity.
- 5.3 The NPPF is also relevant.

PLANNING CONSIDERATIONS

- 6.1 The first consideration is planning policy. The spatial strategy for the district proposed by policy CS01 advises that 70-80% of new housing should be accommodated in Lowestoft, 15-25% in the market towns and 5% in the seven larger villages, including Blundeston.
- 6.2 Policy CS11 includes more detail on housing. It sets a sequential approach to considering new development, with previously developed land within physical limits of settlements being the most preferable, followed by previously developed land on the edge of settlements.
- 6.3 The policy also provides more detail on development in the larger villages, saying that only small-scale development commensurate with their scale and character will be allowed.
- 6.4 In this case the site is outside the physical limits for Blundeston and so is considered to be open countryside in planning policy terms, where there is a presumption against new development.
- 6.5 However whilst this application is contrary to policy, this is a large "brownfield" site, which is now redundant. From the announcement of the prison's closure in 2013 the Council has taken a pragmatic approach and accepted that the site should be redeveloped rather than left to become an eyesore.
- 6.6 The Council was able to contribute to the Planning Information Document (PID) that formed part of the sales particulars, and prepared its advice in consultation with the Parish Council. The final version was approved by the Local Plan Working Group. Although not "planning policy" as such, it can be given some limited weight.
- 6.7 The PID says:
- 6.8 "The site is brownfield and outside the defined physical limits of Blundeston village. Blundeston is classed as a 'Larger Village' in the settlement hierarchy where some development is acceptable. The Council accepts that development would be acceptable in this case because of its special circumstances. Being close to the edge of the village, the Council accepts that a development, subject to type and nature, could be considered sustainable.

- 6.9 In principle, Waveney District Council supports the redevelopment of the site for a range or mix of uses including residential (Class C3), residential institutions (Class C2), tourism and leisure (Class C1), educational (Class D1) and small scale employment uses (Class B1), subject to providing a high quality and innovative design that responds to the character of the site, the surroundings and connectivity with the village.
- 6.10 In any new proposal, the Council will need to consider matters in relation to highways and parking, housing mix, affordable housing, education provision, community facilities and approaches to sustainable design. The Council would look positively upon proposals that optimise the development potential of the site and that strengthen physical links with Blundeston, thereby creating cohesion and placemaking. Proposals should also try to deliver links to the lake immediately to the south of the site.
- 6.11 Subject to meeting the criteria of specific policies, WDC has indicated that it would apply the following criteria to development proposals:
- Uses – residential dwellings, residential institutions, educational, tourism and leisure and small scale employment or supporting uses;
 - Infrastructure – relative to scale and form of development, including community facilities (in particular school capacity) and highways;
 - Affordable housing – 35% subject to viability;
 - Housing mix - 30% - 40% of all new dwellings should be 1 and 2 bed
 - Height – maximum of 3 storeys;
 - Density – commensurate with the characteristics of the area (approximately 25 dwellings per hectare);
 - Landscaping – should seek to retain existing hedgerows, mature trees and areas of open space;
 - Open Space – in line with standards and requirements set out in the Council's Open Space SPD. The availability of an all-weather sports facility should be retained or re-provided for local use. The former prison farm provides potential for allotment use. Both would contribute towards the developments on site open space requirement.
 - Parking – should be provided in line with Suffolk County Council's Guidance for parking (2014).
- 6.12 The application proposes residential development, a residential institution (care home) and some employment use in the form of the shops and three office buildings. When members visited the site in 2014 they were hoping that some of the existing workshops on the site could be retained. However the application Design and Access Statement (DAS) says:
- 6.13 "We have looked at the potential for the reuse of existing buildings on the site for employment. The workshop buildings are in a poor state of repair and would need substantial alteration to meet modern need, particularly by subdivision into smaller units. Given the range of low cost space currently in the town, with rental values providing a return below construction cost, we presently conclude that conversion and renovation of these buildings is not a viable proposition. There remains a compatibility issue with residential occupancy of the site with the type of uses which find cheap workshop premises attractive, by virtue of noise and general disturbance."
- 6.14 Officers have visited the site in conjunction with an officer from the Economic Regeneration Team and accept the points put forward by the applicant. However the application does include two shops and three office buildings which will provide some employment on the site.
- 6.15 One area where the application does depart from the PID is in relation to the retention of the existing Astro turf pitch. The DAS says:
- 6.16 "We have investigated the potential for the reuse of the Astro turf pitch but find that the surface is worn beyond repair and that its replacement is not economic. Astro turf cannot

be used by local football clubs other than for training and there is insufficient demand in the area to justify the cost of relaying the surface. Whilst hockey can be played on AstroTurf, there is no demand in the area for such a facility with the Cliff Park pitch in Gorleston meeting local need.

- 6.17 We have explored at some length, with Lowestoft Rugby Club the potential for relocating their activities from Gunton as part of a package to redevelop their site for housing. Whilst these discussions initially proved promising, the club have concluded that such a move is not presently viable for them and they are presently exploring alternative options. We understand that the issue of access to the site by spectators may have been an issue for them.”
- 6.18 Officers have consulted Sentinel Leisure, who manage the Council’s leisure facilities. Their comments are:
- 6.19 “Sentinel as the Council partner in delivering leisure services, has been asked for its view of the current 3G pitch’s potential and suitability for community provision.
- 6.20 We at Sentinel have conducted two site visits and have held a review meeting. We have also contacted Sport England for their opinion of what factors we should consider when drawing a conclusion.
- 6.21 Our overwhelming opinion is that although in principle a 3G pitch with floodlights would be a welcome addition to community facilities within the district, there are a number of limitations and concerns that make this 3G pitch not suitable for community provision nor would it be an opportunity Sentinel would take.
- 6.22 The key reasons for this conclusion are;
- 6.23 1, Current access to the site is not appropriate and if the site was developed to improve access it is still located in a remote part of the district and therefore would require significant car parking.
- 6.24 2, the quality of the pitch and sub base does not look in good condition and in our opinion would be required to be re-laid with some work required to sub base. However please note we have not conducted intrusive site inspections or surveys.
- 6.25 3, There is a lack of appropriate changing facilities or a community reception area containing catering facilities, so this would require significant investment.
- 6.26 4, the close proximity of residential housing may prove a problem if the site and flood lights were used seven days a week until 10pm so opening hours may be limited or new floodlighting may be required.
- 6.27 5, the pitch is not enclosed with appropriate fencing and viewing areas, so this would need to be installed.
- 6.28 6, considering the investment required for the playing surface, fencing, changing, reception area and possible floodlights, coupled with the remote location, we believe the site is not financially sustainable and it would be difficult to find an operator or community group to manage the site over a long sustainable period.
- 6.29 Community sports clubs would probably consider taking on the facility however we believe that without significant capital investment and specialist operating experience the site would not be financially sustainable.
- 6.30 If the site is changed to alternative use it would be good if the floodlights (if working) could be used at an alternative site in the district.”

- 6.31 On the form of the development more generally, the DAS states:
- 6.32 “Presently we see the site as two phases of construction. The first, for which we are seeking a full grant of planning permission, utilises the existing main access. It provides a pair of shop units, 16 affordable housing units as part of the overall provision for the site and on the north side of the access road into the site, 3 bespoke office units. This phase would be constructed contemporaneously with the demolition of the prison. The second phase, for which we are presently seeking an outline grant of planning permission, divides in to four areas. The first area uses the eastern most access and offers the opportunity for lower density development. It will include a range of detached properties at the eastern end of the site a running down the hill and will also include the construction of the public open space
- 6.33 The second area, as a row or contemporary terraced properties adjacent the lake, each accessed from the rear but with views over the lake and serviced through the third area which comprises more conventional terraced and semi-detached properties.
- 6.34 Subject to commercial demand space is reserved adjacent to the third area for a retirement home.
- 6.35 The site presents a unique opportunity to develop housing within a sylvan setting and the majority of the perimeter woodland will be retained, although for safety reasons a number of dead or dying trees along the existing road frontage will be removed.
- 6.36 Public open space. The areas of woodland around the site have been neglected for many years and need a substantial amount of work. We would envisage that much of this woodland could be dedicated as public open space, subject to suitable adoption agreements along with additional areas of more formal children’s play space within the site. An area of open space to meet local need for children’s play has been incorporated in to the development and it is anticipated that this, once equipped, will be adopted by either the parish or district council and maintained for public use.
- 6.37 Ecology. The site is adjoined on its eastern boundary by a County Wildlife site. The extent of the designation is shown on the submitted plans and development has been excluded from this area.
- 6.38 The site is presently home to a variety of flora and fauna. These are itemised in the Ecology Report which accompanies the application. No protected species were found on the site. Proposals for mitigation particularly in relation to both bats are Barn Owls are set out in the report which concludes that the site will be a better place for bat foraging when redeveloped due to the loss of the floodlighting. The report also concludes that further investigations for invertebrates and reptiles should take place and this matter could be covered by condition for completion prior to the commencement of development.
- 6.39 Trees. Much of the site is surrounded by trees. A detailed condition survey has been carried out on those trees which fall in to the area of phase 1. A further survey will be conducted of the trees in phase 2 to accompany the reserved matters submission. A large number of the trees are self-sown and many of the older trees are in need of maintenance. Dead or dying trees have been identified by Simon Aylmer for immediate attention on grounds of safety and these have been marked on site.
- 6.40 Timescales. It has to be understood that whilst the quantum of development shown in the plan is significant, in the context of its village location, the properties do not all appear in one go. Assuming a consent for around 140 dwellings and a delivery rate of perhaps 15-18 units per year, dependent upon the economy, the site would have a life expectancy of around 7-8 years. This is a gradual process and provides a reasonable time scale for assimilation of a development of this size in to the village”.

- 6.41 A supporting letter advises that demolition and clearance of the prison buildings could take up to 12 months, and they hope to commence development of phase 1 concurrently with demolition.
- 6.42 A number of issues have been raised by consultation. The County Council has requested various developer contributions. Most of these would be delivered through Community Infrastructure Levy (CIL). However if the application is approved and the existing buildings were in use for 6 of the 36 months preceding that approval, the existing floorspace can be deducted. The Council accepts that the buildings were in use until the end of February 2014. This does mean that the amount of CIL due will be limited.
- 6.43 A section 106 agreement will be required for the affordable housing and public open space.
- 6.44 Natural England has no objections but highlights the opportunities for enhancement. This could be secured by a planning condition.
- 6.45 Suffolk Archaeology recommend two conditions for building recording and investigation and these are included in the recommendation.
- 6.46 Environmental Health recommend two conditions to regulate demolition and construction and these are included in the recommendation.
- 6.47 The Environment Agency has objected as it does not consider that the Flood Risk Assessment is adequate. A revised FRA has been submitted and the further comments of the Environment Agency are awaited.
- 6.48 Suffolk Floods Management has requested further information; again further comments are awaited.
- 6.49 There are significant numbers of mature trees of the site, particularly on the roadside frontage. Both the Landscape Officer and Landscape Manager have visited the site. They note that the woodlands that surround this site are County Wildlife Sites (CWC). The existing CWC DM29 that surrounds the development will be reinforced with new landscaping planting to the edge of the development.
- 6.50 A Tree Survey was submitted along with the planning application and officers accept its findings. The trees along the site / road frontage are in varying condition; there are many dead trees and those in need of remedial works, including an overgrown relatively young beech hedge which could do with bringing back to a hedge.
- 6.51 There are trees to be removed to enable the starter homes and offices. To enable the starter homes there are; (trees numbered as per Simon Aylmer's Tree Survey): 69 Whitebeam, 68 Norway Maple, 67 Whitebeam, 66 Whitebeam, 65 Norway spruce, 64 Whitebeam, 63 Norway Maple, 61 Crap Apple, 62 Whitebeam
- 6.52 The trees to be removed for the offices are: 03 Beech, 04 Sycamore, 901 can't find on tree survey, 903 Sycamore, 904 Sycamore, 495 Holly, 493 Sycamore, 492 Sycamore, 491 Oak, 480 Yew, 481 Sycamore, 477 Oak, 470 Oak
- 6.53 Officers have no problems with the principle of this proposal and recommend conditions requiring detailed protective fencing, positive new landscaping proposal and management plan detailing how landscaping and trees are to be managed in the future.
- 6.54 Finally SCC Highways also object due to the absence of a Transport Assessment and Travel Plan. Again these have been submitted and further comments are awaited.

- 6.55 Comments from neighbours relate mainly to phase 1 of the development and refer to the location of the proposed shops (mainly in relation to potential traffic congestion) and also to the impact of the block of starter homes. In relation to the proposed shops off-street parking is proposed, and subject to the comments of SCC highways it is not anticipated that there would be any particular issues.
- 6.56 The objection in relation to the starter homes comes from the immediately adjoining resident. The site plan shows the building close to the shared boundary with only a pedestrian path at the side. However there would be approximately six metres between the side of 2 Lakeside Rise and the proposed starter homes. Although the central section of the block would have three stories, the outer wings are of conventional two storey height (5 metres to the eaves) with a hipped roof to reduce the impact. It is not considered that the impact on the neighbour would be sufficiently serious to justify refusal.

CONCLUSION

- 7.1 “Encourage re-development of the former Blundeston Prison site for uses that meet local community and Council aspirations” is one of the specific actions for the Council in the East Suffolk Business Plan. This application largely complies with the Council’s aspirations for the site as expressed in the Planning Information Document, and where it does depart from it (for example on the retention of the all weather pitch) the departures have been justified by further investigation.
- 7.2 As this report was drafted, further consultee comments were awaited in relation to the Flood Risk Assessment, but it is not anticipated that this issue will result in a recommendation of refusal. Comments from SCC highways are anticipated to be available before the meeting.
- 7.3 A section 106 obligation will be required, covering:
- Provision of affordable housing
 - Provision and future management of on-site open space and play equipment, and
 - Marketing of the proposed office buildings.

RECOMMENDATION

That authority be granted to officers to grant permission, subject to:

1. Receipt of consultation responses from the Environment Agency, Suffolk Floods Management and Suffolk highways, and any additional conditions arising therefrom.
2. Completion of a section 106 obligation covering
 - Provision of affordable housing
 - Provision and future management of on-site open space and play equipment, and
 - Marketing of the proposed office buildings.

And the following conditions:

In relation to Phase 1 of the development (as identified on drawing number 6845-Ph01 received 24 May 2016):

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be carried out in accordance with approved drawing references: 6845-EX01, 6845-MP01, 6845-PL01, 6845-PL02, 6845-PL03, 6845-PL04, 6845-PL05, 6845-SP01 and BBBP1/1 received 24 May 2016, for which permission is hereby granted.

Reason: To secure a properly planned development.

3. Details of all external facing and roofing materials shall be submitted to and approved by the Local Planning Authority before development commences. Development shall be carried out in accordance with the approved details.

Reason: To ensure the satisfactory external appearance of the development.

4. 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:

The programme and methodology of site investigation and recording

The programme for post investigation assessment

Provision to be made for analysis of the site investigation and recording

Provision to be made for publication and dissemination of the analysis and records of the site investigation

Provision to be made for archive deposition of the analysis and records of the site investigation

Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

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.

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 Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

5. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 4 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 Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

6. Before the shops hereby approved are first brought into use the parking areas shown on drawing number 6845-SP01 received 24 May 2016 shall be available for use, and shall be so maintained thereafter.

Reason: to ensure that adequate parking provision is available for the shops.

7. No development shall take place until the existing trees on site, agreed with the Local Planning Authority for inclusion in the scheme of landscaping, have been protected by the erection of temporary protective fences of a height, size and in positions which shall previously have been agreed, in writing, with the Local Planning Authority. The protective fences shall be retained throughout the duration of building and engineering works in the vicinity of the tree to be protected. Any trees dying or becoming severely damaged as a result of any failure to comply with these requirements shall be replaced with trees of appropriate size and species during the first planting season, or in accordance with such other arrangement as may be agreed in writing with the Local Planning Authority, following the death of, or severe damage to the trees.

Reason: For the avoidance of damage to protected trees included within the landscaping scheme in the interests of visual amenity and the character and appearance of the area.

8. Before the development hereby permitted is first brought into use a Management Plan for the trees to be retained on the site shall be submitted to and approved in writing by the local planning authority. The trees shall be managed in accordance with the approved Management Plan.

Reason: In the interests of the visual amenity and character of the area.

9. The Mitigation measures outlined in section 8 of the submitted Biodiversity and Protected Species Report (namely provision of bat boxes (8.1), time limits for work to trees and provision of bird boxes (8.2), measures for amphibians and reptiles during construction (8.5) incorporation of native wildlife species in landscaping (8.10) and lighting (8.11)) shall be provided within six months of the development being brought into use.

Reason: In the interests of the biodiversity of the area.

10. No burning of waste materials (including green waste) should be take place on site during construction and demolition.

Reason: to protect the amenities of nearby residents

11. No demolition and construction works shall take place until a site specific Environmental Management Plan has been submitted to and approved in writing by the local planning authority. The plan must demonstrate the adoption and use of the best practicable means to reduce the affects of noise, vibration, dust and lighting. The plan should include, but not be limited to:

- * Procedures for maintaining good public relations including complaint management, public consultation and liaison

- * Arrangements for liaison with the Council's Environmental Protection Team

- * All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the LPA, shall be carried out only between the following hours:

08:00 Hours and 18:00 Hours on Mondays to Fridays and 08:00 and 13:00 Hours on Saturdays and; at no time on Sundays and Bank Holidays.

- * Deliveries of materials to and removal of plant and equipment, machinery and waste from the site must only take place within the permitted hours detailed above.

- * Mitigation measures as defined in BS 5228: Parts 1 and 2: Noise and Vibration Control on Construction and Open Sites shall be used to minimise noise disturbance from the demolition and construction works.

- * Procedures for the emergency deviation of the agreed working hours.

- * Control measures for dust and other air-borne pollutants. This must also take into account the need to protect any local resident who may have a particular susceptibility to air – borne pollutants.

Please note that Best Practicable Means (BPM) to reduce the noise impact upon the local community should include the following:

- All demolition and construction plant and equipment should comply with EU noise emission limits:
- Proper use of plant with respect to minimising noise emissions and regular maintenance. All vehicles and mechanical plant used for the purpose of the works should be fitted with effective exhaust silencers and should be maintained in good efficient working order.;
- Selection of inherently quiet plant where appropriate. All major compressors should be 'sound reduced' models fitted with properly lined and sealed acoustic covers which should be kept closed whenever the machines are in use and all ancillary pneumatic percussive tools should be fitted with mufflers or silencers of the type recommended by the manufacturers:
- Machines is intermittent use should be shut down in the intervening periods between work or throttled down to a minimum:
- Plant and equipment such as flatbed Lorries, skips and chutes should be lined with noise attenuating materials. Materials should be handled with care and placed, not dropped.

Reason: to protect the amenities of nearby residents

In relation to Phase 2 of the development (as identified on drawing number 6845-Ph01 received 24 May 2016):

1. a) Application for approval of any reserved matters must be made within three years of the date of this outline permission and then
- b) The development hereby permitted must be begun within either three years from the date of this outline permission or within two years from the final approval of the reserved matters, whichever is the later date.

Reason: To comply with section 92 of the Town and Country Planning Act 1990.

2. Plans and particulars showing the detailed proposals for all the following aspects of the development ("the reserved matters") shall be submitted to the Local Planning Authority and development shall not be commenced before these details have been approved:
 - a) The layout including the positions and widths of roads, footpaths and cycleways including levels, gradients and means of surface water drainage.
 - b) The siting of all buildings and the means of access thereto from an existing or proposed highway
 - c) The design of all buildings, including the colour and texture of facing and roofing materials
 - d) An accurate plan showing the position, type and spread of all trees on the site and a schedule detailing the size and physical condition of each tree and where appropriate, the steps to be taken to bring the tree to a satisfactory condition; and also details of any proposals for the felling, lopping, topping or uprooting of any tree.
 - e) A landscape design showing the planting proposed to be undertaken, the means of forming enclosures, the materials to be used for paved and hard surfaces and the finished levels in relation to existing levels
 - f) Measures to minimise water and energy consumption and to provide for recycling of waste
 - g) The layout of foul sewers and surface water drains
 - h) The provision to be made for the parking, loading and unloading of vehicles
 - i) The alignment, height and materials of all walls and fences and other means of enclosure
 - j) The provision to be made for the storage and disposal of refuse

Reason: To secure a properly planned development.

3. 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:
- The programme and methodology of site investigation and recording
 - The programme for post investigation assessment
 - Provision to be made for analysis of the site investigation and recording
 - Provision to be made for publication and dissemination of the analysis and records of the site investigation
 - Provision to be made for archive deposition of the analysis and records of the site investigation
- Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- 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.

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 Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

4. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 4 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 Policy CS 17 of Waveney District Council Core Strategy Development Plan Document (2009) and the National Planning Policy Framework (2012).

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Reason: For the avoidance of damage to protected trees included within the landscaping scheme in the interests of visual amenity and the character and appearance of the area.

6. Before the development hereby permitted is first brought into use a Management Plan for the trees to be retained on the site shall be submitted to and approved in writing by the local planning authority. The trees shall be managed in accordance with the approved Management Plan.

Reason: In the interests of the visual amenity and character of the area.

7. The Mitigation measures outlined in section 8 of the submitted Biodiversity and Protected Species Report (namely provision of bat boxes (8.1), time limits for work to trees and provision of bird boxes (8.2), measures for amphibians and reptiles during construction (8.5) incorporation of native wildlife species in landscaping (8.10) and lighting (8.11)) shall be provided within six months of the development being brought into use.

Reason: In the interests of the biodiversity of the area.

8. No burning of waste materials (including green waste) should be take place on site during construction and demolition.

Reason: to protect the amenities of nearby residents

9. No demolition and construction works shall take place until a site specific Environmental Management Plan has been submitted to and approved in writing by the local planning authority. The plan must demonstrate the adoption and use of the best practicable means to reduce the affects of noise, vibration, dust and lighting. The plan should include, but not be limited to:

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- Proper use of plant with respect to minimising noise emissions and regular maintenance. All vehicles and mechanical plant used for the purpose of the works should be fitted with effective exhaust silencers and should be maintained in good efficient working order,;

- Selection of inherently quiet plant where appropriate. All major compressors should be 'sound reduced' models fitted with properly lined and sealed acoustic covers which should be kept closed whenever the machines are in use and all ancillary pneumatic percussive tools should be fitted with mufflers or silencers of the type recommended by the manufacturers:

- Machines is intermittent use should be shut down in the intervening periods between work or throttled down to a minimum:

- Plant and equipment such as flatbed Lorries, skips and chutes should be lined with noise attenuating materials. Materials should be handled with care and placed, not dropped.

Reason: to protect the amenities of nearby residents.

APPENDICES	
Appendix A	Notes of Site Visit held on 8 August 2016

BACKGROUND INFORMATION: See application ref: DC/16/2157/FUL at www.waveney.gov.uk/publicaccess
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