

Reason

The FRA (Flood Risk Assessment, submitted with this application do not comply with the requirements set out in paragraph 9 the Technical Guide to the National Planning Policy Framework.

The principle of appropriate management of surface water has not been fully established and further investigation and design will be required to establish the detail of the strategy and ensure the requirements of the National Planning Policy Framework (NPPF) are met. Central to this approach will be ensuring that flood risk is not increased elsewhere (including to the proposed development) and giving priority to the use of sustainable drainage systems (SUDS).

The submitted information does not therefore; provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA and Drainage Strategy fail to provide:

1. **An appropriate assessment of the impacts of climate change.** Section 3.3 of the Drainage Strategy states that a 20% increase in the rainfall intensity for the 1 in 100 year return period event will be used to account for climate change. A 20% climate change allowance is also referred to within section 3.4.14 of the Drainage Strategy and section 10.5 of the FRA. Assuming that the design lifetime of this commercial development is expected to be 75 years, the climate change allowance applied to peak rainfall intensity should be 30%, in accordance with Table 5 of the Technical Guide to the NPPF. Therefore, the calculations submitted will require amendment to reflect this figure.
2. **A clear assessment of the principle of appropriate management of surface water.** The FRA suggests within section 3.4.6 that a gravity overflow set above the design reclaim storage water level (of the attenuation lagoons) will discharge at the greenfield rate by means of hydrobrake or similar control mechanism to adjacent water course, sewer or onsite soakaway. Whilst we support the aims of the scheme, the principles of the management of surface water must be clarified and further detail provided.
3. **Calculations to demonstrate that the proposed surface water management scheme has been adequately sized to manage and accommodate the critical duration 1 in 100 year rainfall event, including correct allowances for climate change, without causing nuisance or damage.** The calculations must also be amended to make provision for the proposed restriction method, and consider both storage and conveyance of surface water.

We acknowledge that the drainage strategy has carried out calculations to establish the approximate volumes of attenuation required at the site, however the appropriate restriction rate has not been provided in order to ensure that sufficient space is available based on the site layout. Therefore, more detail is also required to confirm that the Greenfield runoff rate can be achieved post development, with the correct climate change allowance applied. In addition, further design detail regarding the proposed restriction method and should be provided.

4. **Sufficient plans and drawings showing the locations and dimensions of all aspects of the proposed surface water management scheme.** Plans should demonstrate that the proposed drainage layout will perform as intended based on the topography of the site and the location of the proposed surface water management features. This is especially important considering that section

creating a better place



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 Planning Department
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Our ref: AE/2014/117121/02-L01
 Your ref: 3655/13
 Date: 16 April 2014

Dear Sir/Madam

**ERECTION OF TWO GREENHOUSES, ASSOCIATED ANCILLARY
 INFRASTRUCTURE, PROVISION OF A PIPELINE TO THE GREAT BLAKENHAM
 ENERGY FROM WASTE PLANT AND THE DIVERSION OF A PUBLIC RIGHT OF
 WAY: LAND AT DAIRY FARM, LORAINIE WAY, BRAMFORD**

Since objecting to the above planning application on flood risk grounds, we have received a letter dated 20 February 2014 from RPS Group Ltd (Ref: SPT\NK017563) which states, among other things, '*[We] understand your concerns regarding the absence of a hydraulic model and site specific percolation rate information and will seek to provide additional information regarding this issue pre-determination*'.

We support the undertaking of onsite percolation tests, undertaken in accordance with BRE365, and subsequent Windes modelling. Once we have received this additional information we can then re-consider our position.

Yours faithfully

Andrew Hunter
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10.5 of the FRA indicates that soakaways will be designed for the 1 in 10 year event, including allowances for climate change. Section 3.4.12 of the Drainage Strategy also states 'for longer return period design storms the finished levels will be designed to ensure that any surcharging water is contained within the site boundary and will not enter buildings on the site'. Flow routing will be required to confirm that no nuisance or damage will be caused by the onsite flooding. In addition, full design details, including cross sections of any proposed attenuation or infiltration features will be required.

5. **Confirmation that in the event of exceedance flows that surpass the critical duration rainfall event or a blockage/failure occurs within the drainage network the surface water management features will incorporate an emergency spillway as part of their design.** We suggest that the emergency spillway directs any exceedance flows away from the development. Paragraph 5.9 of the PPS25 Practice Guide (not replaced by the NPPF) states that the best way of reducing flood risk within new development is to consider exceedance i.e. what flow paths will be taken by excess surface water when the capacity of the drainage system is exceeded. Further clarification is provided in paragraphs D5 and D6 of the DEFRA consultation document 'National Standards for sustainable drainage systems', December 2011: exceedance flows must be managed in flood conveyance routes that minimise the risks to people and property both on and off the site. Therefore, in the event of exceedance of the capacity of the drainage network or a blockage/failure within the drainage network, people or property could be at risk; therefore, exceedance flow routing details will also be required.
6. **Details of the future adoption of all aspects of the surface water drainage strategy.** The local planning authority should be satisfied that arrangements are in place for the long term maintenance and management of the surface water management scheme. Discussions over the long term access for maintenance, and any safety requirements, should be discussed with the adopting authority and early consultation should be undertaken to ensure they are satisfied with the design of all relevant features.
7. **Infiltration test results, undertaken in accordance with BRE Digest 365 at the location of the proposed infiltration features to establish if they can be utilised.** Infiltration tests must be undertaken in the proposed locations of the infiltration features. This testing should comprise at least one test in each infiltration feature or soakaway group, to be undertaken in accordance with BRE Digest 365. At present soakaway volumes have been determined using an assumed percolation rate for sand and gravels of 0.0001 m/sec. Therefore, ascertaining an accurate infiltration rate is critical to the design and has the potential to impact site layout. In addition, glacial deposits are inherently geotechnically uncertain and highlight the need for site specific testing. In the event the site proves to be unsuitable for infiltration, the FRA should provide information to demonstrate that surface water runoff from the developed site shall not exceed the existing rates of runoff for a range of equivalent return period rainfall events.
8. **Sufficient design detail (in accordance with CIRIA C697 The SUDS Manual).** As the proposed lagoons are potentially providing biodiversity benefits, careful consideration will need to be given to the design to maximise the ecological potential. Access for the removal of silt is of particular importance with ponds/lagoons, and further details can be found in CIRIA C697 The SUDS Manual. In particular, for ease of maintenance, it may be beneficial to include a

sediment forebay, a permanent pool, temporary storage volume and a shallow zone. Specific consideration should also be given to vehicle access, and discussions should take place with the adopting authority over all these issues. A freeboard of 300mm will also be required. Further guidance on this can be found in CIRIA C697 The SUDS Manual.

As the discharge from the lagoons is potentially into adjacent watercourses or sewer, there is a flood risk requirement to attenuate the discharge rate. Therefore, there is potential for flows to be required to be attenuated in the lagoons, above the retained water level. The implications of this on the surface water drainage scheme would be likely to need to be considered further.

Section 7.5 of the FRA states 'it is anticipated that shallow groundwater is present at approximately 7.0 mAOD at the eastern end of the site'. In addition section 3.4.2 states that 'given the anticipated high ground water level, measures will be implemented to prevent flotation of the lagoons'. Additional detail should be provided regarding these measures and the effect groundwater may have on the design of the lagoons. In addition, infiltration features must be a minimum distance of 1m from the base to the seasonally high groundwater table, in accordance with key design criteria.

9. Modelling of the piped network. If the intention is for surface water to be conveyed to the lagoons or soakaways, further modelling of the piped network will be required to ensure that in a range of events up to and including the critical duration 1 in 100 year return period event the network will be able to manage the expected volumes of water. Paragraph 5.51 of the PPS25 Practice Guide (not replaced by the NPPF) provides further guidance on the management of exceedance flows. An emergency spillway to safely manage any flows in exceedance of the storage capacity (or if the outlet becomes blocked) will be important to incorporate into the design.

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to the Applicant

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the Lead Local Flood Authority which in this instance is Suffolk County Council. It is best to discuss proposals for any works with them at an early stage.

The FRA and Drainage Strategy indicate that the soakaways will be designed for the 1 in 10 year return period event, including allowances for climate change. As this development is required to manage the 1 in 100 year return period event, including allowances for climate change, the performance of the attenuation or infiltration features under these conditions needs to be known. Subsequently, the features should be sized to manage this event, to ensure surface water is accommodated on site.

In addition, The SuDS Manual states that infiltration features should discharge from full to half volume within 24 hours, regardless of the return period to which the system is designed. We support precautionary design and the design requirements of the SuDS Manual. In accordance with the NPPF, the FRA must demonstrate that surface water can be managed for the lifetime of the development, including allowances for climate change. Therefore, even if features are designed to accommodate the 1 in 10 year return period event; in this case, the 1 in 100 year return period event, including allowances for climate change must also be managed. Any surface water not accommodated by the features during the 1 in 100 year return period event, including allowances for climate change, will need to be managed appropriately by alternative means. Subsequently, it is often more pragmatic to design features to the 1 in 100 year return period event, including allowances for climate change to ensure they are sized to accommodate required volumes and to facilitate an acceptable half drain time.

Regard should be made, in relation to infiltration methods, to our comments further below under the sub-heading of Surface Water Management.

Pollution Prevention and Control

We have no objection under this heading subject to the applicant confirming that the following will be implemented:

The fertiliser store to be on an impermeable surface, with contained drainage and under cover.

Any pesticide storage and filling area to be on an impermeable surface and with contained drainage.

Any fuel used for agricultural purpose must be stored in accordance with the Silage, Slurry and Agricultural Fuel Oil Regulations (the SSAFO Regs) and the Environment Agency must be pre-notified in writing at least 14 days prior to construction of such storage facilities. A form for pre-notifying us is available on our website.

In addition, we have noted that groundwater will be intercepted along the western boundary of the site. As this is adjacent to an old uncontained landfill which took biodegradable waste, there is the potential for the intercepted groundwater to be contaminated. Therefore this should not be discharged to a watercourse, and provision should be made to determine the risk should it be discharged to soakaway.

We suggest that a suitably worded condition for a pollution scheme, taking into account our comments above, should be appended to any planning permission granted.

Groundwater and Land Contamination

The site is underlain by Chalk Bedrock, designated as Principal Aquifer, with Superficial Deposits overlying only the eastern part, consisting of sand & gravel, designated as Secondary A Aquifer.

The site is situated within a Groundwater Source Protection Zone 2, with surface water drains adjacent to the eastern boundary and significant water features only approximately 50m to the east.

We therefore consider controlled waters at the site to be of high environmental sensitivity.

Land Contamination

The application indicates the current and previous use of the site to generally be cultivated agricultural land, and as such is considered to have a low contaminative potential.

We therefore do not consider this site a priority and will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

The developer should address risks to controlled waters from any potential contamination at the site, following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.

Informative/advice to applicant

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) should be carried out until the developer has submitted and agreed a remediation strategy with the local planning authority detailing how this unsuspected contamination will be dealt with. The remediation strategy should be implemented as agreed.

Surface Water Management: Informative/advice to applicant

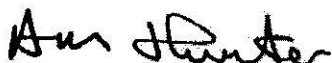
Where soakaways or other infiltration systems are proposed for the disposal of surface water, the general requirements are as follows:

1. Soakaways or other infiltration systems shall only be used in areas on site where they will not present a risk to groundwater, with the depth of soakaway kept to a minimum to ensure that the maximum possible depth of unsaturated material remains between the base of the soakaway and the top of the water table, ensuring that a direct discharge of surface water into groundwater is prevented.
2. Soakaways shall not be constructed in land affected by contamination, where they may promote the mobilisation of contaminants and give rise to contamination of groundwater.
3. Only clean water from roofs shall be directly discharged to soakaway.
4. Systems for the discharge of surface run-off from roads, car parking and public or amenity areas shall incorporate appropriate pollution prevention measures.

Environmental Permit

The activity at the site does not need to be included on the Environmental Permit for the Energy from Waste plant at Great Blakenham, as we do not consider it to be a Directly Associated Activity.

Yours faithfully



End

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End



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04/02/2014

Dear Elizabeth,

RE: 3655/13 Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way. Lower Dairy Farm, Loraine Way, Bramford

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

We have read the ecological survey report (RPS, Dec 2013) and we note the findings of the consultant. The ecological consultant's identify a number of potential impacts that could result from the proposed scheme and identify a number of mitigation and compensation measures that should be implemented in full, via a condition of planning consent, should permission be granted. Survey work at the site identified that Pound Lane and the northern site boundary were particularly important commuting and/or foraging routes for bats and it is essential that these remain unaffected by the proposed development, both during construction and operation. It is unclear what level of operational lighting is proposed at the site, increased lighting has the potential to have a significant adverse impact on species such as bats. It should be ensured that the development does not result in an increase in light levels at either the existing or proposed vegetation, especially along Pound Lane or the northern site boundary. We suggest that the level of lighting required is clarified, the production of a light spill plan (LUX diagram) may be helpful in determining whether the proposed development is likely to result in a significant increase in light levels.

In addition to the impacts identified in the ecological survey report the proposed greenhouses have the potential to result in the loss of nesting habitat for skylarks. We suggest that the opportunity for the creation of new nesting habitat, through the provision of nest plots on nearby arable land, is explored as part of this proposal.

We also understand that a species protected under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended) has been recorded near to this site. Given the sensitivity around records of this species we would be happy to provide further information on this matter separately if required.

The provision of areas of new habitat is proposed as part of the scheme, both as compensation for habitat loss and as enhancement of the site. We recommend that the implementation methods and long term management measures for these areas are included in an ecological management plan for the site. Should permission be granted, such a plan should be provided prior to the commencement of any works on site, including any vegetation clearance. It is noted on the Proposed Site Layout (drawing no. NK017563_1000) plan that acid grassland is proposed to be created along the western side of the southern greenhouse. Cubitts Pit County Wildlife Site, 500m to the west of the greenhouse, is designated for is

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Your Ref: 3655/13
Our Ref:
Date: 06/01/2014

Ms Elizabeth Truscott
Planning Dept
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Dear Ms Truscott,

Proposal: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy from Waste Plant and the diversion of a Public Right of Way.

Location: Lower Dairy Farm, Bramford (Also part in the Parishes of Great & Little Blakenham)

Based on the information provided by the applicant and a site visit carried out on the 15th January I offer the following comments.

The information presented by the applicant

The applicant appears to have carried out a reasonable assessment of the landscape and visual impacts of the proposal. The assessment has addressed the visual impacts of the proposal including the potential impacts of the proposed lighting. I note that the red line on the Landscape master plan is not consistent with red line as shown in other parts of the application.

I also note that the woodland planting shown on the landscape master plan is not consistent with that shown on the site layout drawing. It would be appropriate for this discrepancy to be clarified.

The site and landscape

The site is in a valley side location on the southern side of the Gipping Valley. The surrounding landscape is characterised by a mix of arable land, designed parkland landscapes and valley floor landscape. Much of the surrounding landscape has undergone extensive modification with the loss of characteristic features and the introduction of visual detractors including power lines, prominent buildings and industrial development. However

the floor of the Gipping Valley is a locally designated landscape (SLA). The designation boundary is the eastern edge of the B1113.

The landscape impacts

The proposal will lead to the modification of some landscape features, for example the loss of poplar trees to accommodate the northern glasshouse and creation of the access to the northern glasshouse. The proposal will also lead to a significant change of land cover, from arable land to horticulture. While the scale of the proposed change in land use is without precedent locally, I suggest this type of horticultural activity could not be deemed to be significantly alien or unexpected in this rural environment. It appears likely that the proposal will have some limited visual impacts on receptors within the SLA, but no direct impacts on its character or special qualities.

There appear to be significant risks to, landscape features, in particular existing tree belts, associated with this proposal. The proposed ground level changes are very close to the tree belts at the northern end of the site and the pipeline route appears to present significant risks to a line of mature elm trees.

The visual impacts

It is notable that visual impacts of the proposal experienced from the south cannot be wholly mitigated by the proposed planting scheme. This is as a result of the fact that the viewer overlooks the site and comprehensive screening planting cannot be achieved because of the requirements of the East Anglia Offshore Wind cable route.

The local visual impacts, from the B1113 for example, will be of a significant magnitude, particularly prior to the establishment of the planting scheme. More distant views of the site will be available from the higher land to the east of Claydon.

The proposal will also create a significant change in the outlook of some residential properties, *for example* No. 1 2 and 3 Lower Dairy Farm Cottages. The glass houses are between 80-130m from these dwellings and closer to the sides of the lagoon. The applicant has proposed mitigation planting, hedge and trees, to address this issue and in addition No.3 is partially screened from the site by existing vegetation. However, it is clear that there will be significant changes in the character of the outlook from these properties which will not be ameliorated rapidly, as the vegetation will take time to mature. Therefore it is essential that the mitigation proposals in this area are effectively delivered (see Recommendations 1 and 2 below)

Recommendations

Subject to conditions and an effective and detailed scheme of mitigation, it appears that the proposal appears to acceptable in landscape terms, therefore should the LPA be minded to support the proposal I suggest the following conditions are required.

1. A detailed scheme of planting and landscaping should be agreed in writing with the LPA and implemented in the first available planting season following construction. The landscape master plan, subject to amendments, should form the basis of a detailed scheme which should include a of soil preparation planting and aftercare, including watering and weed control covering a period of not less than 10 years. Failed plants should be replaced on a one for one basis for the first 5 years.

Given the scale of the landscape change and the visual impacts created by the proposal, it would be reasonable and proportionate for the landscaping scheme to be controlled by a condition for a period of 10 years, (in accordance with the *Ebdens Farm* appeal decision, APP/W3520/A/10/2128648). This should ensure that the planting scheme is effectively

delivered and maintained and that any significant issues with the planting can be rectified during the condition period.

2. I note the following issues in relation to the landscape master plan which will require clarification or revision
 - i. Some of the proposed planting is outside the red line; the LPA should be satisfied that the applicant has control of this land so that delivery of this mitigation planting can be controlled by condition. Furthermore, both the red line and the extent of the proposed planting is not consistent when the Landscape Master plan and the site layout plan are compared.
 - ii. The applicant needs to ensure that the new woodland areas are adequately protected from deer by appropriate fencing and should provide these details to the LPA as part of the detailed scheme of planting and aftercare. Furthermore, in the proposals as currently presented, it is not clear that adequate methods of protection are being proposed, particularly for the Scots Pine trees.
 - iii. The planting scheme includes species that are unlikely to thrive in this location, for example holly, or are inappropriate, for example beech. After discussions with the County Ecologist, I suggest the following locally appropriate replacements are made for the planting proposals: replace all Holly with Common Dogwood, all Beech with Hornbeam and all Rowan *Sorbus aucuparia* with Wild Service Tree *Sorbus torminalis*.
 - iv. The proposed planting of standard trees along the road frontage adjacent to or within the existing hedge line carries a significant risk of failure. While the applicant is clearly hoping to achieve an instant effect the landscaping scheme will need to demonstrate that this can be achieved give the requirement for watering and the competition from the hedging to be retained along the road frontage.
3. The landscaping scheme should include specific details of soil handling and separation to ensure that topsoil is retained for planting and the location and size of any temporary storage bunds should be included in this scheme of work. This will ensure that the topsoil is retained and conserved and that movement and storage of soils does not conflict with tree protection requirements (BS5837).
4. Details of colour and cladding should be controlled by condition. The colour and cladding should be in accordance with the submitted scheme as shown on the drawings NK017563-1300, ~1305, ~1310 and ~1315. Any modifications to this scheme of colour and cladding should be agreed in writing with the LPA.
5. A detailed scheme of external lighting should be agreed in writing with the LPA prior to commencement of the development. The use of LED and/or full cut of lighting are likely to be effective approaches, which should reasonably minimise the impact of light on the surrounding environment.
6. A detailed scheme of measures to minimise the impact of the internal lighting of the glasshouses, should be agreed in writing with the LPA prior to commencement of the development.

In order to control the impact of lighting on wildlife, in particular bats, it may be necessary for the applicant to provide lux level plans. However, this is a matter for the relevant consultees.

7. The LPA should be satisfied that the arboricultural impacts of the development have been reasonably minimised and can be adequately controlled by condition. In particular the potential impact of the construction of the northern glasshouse and the diversion of the footpath on the surrounding tree belts.

There is also a risk of damage to the line of mature elm trees because of the route of the pipeline connecting the EfW plant to the glasshouses. I suggest it would be appropriate for a supervising arborist should be appointed to oversee this part of the works and that this is should be controlled by a condition.

However these are matters for Mr David Pizzey the MSDC/BDC Arboricultural Officer.

8. There appears to be an opportunity for offsite planting to contribute to the mitigation of visual impacts in views of the site from the south, by the planting of roadside trees along the southern side of Somersham Rd, (part of a section between Rutters Farm and Sycamore House), I suggest that this option should be explored by the applicant in consultation with the Highways Authority. However, I recognise this may be constrained by the overhead services.

Reasons

1. I have made these recommendations in order to reasonably minimise the impacts of the proposal on the character of the landscape and public visual amenity.
2. It is a well-established planning principle that there is no right to retain an unchanged view from a private property. Only if a proposal would have such a severe adverse impact on the outlook from a property, in terms of being intrusive, overbearing or oppressive, such that it would make it a significantly less attractive place to live, then protecting the amenities of a dwelling *may* be a legitimate and material planning consideration.
3. These recommendations have been made without consideration of potential impacts on listed buildings, which are a matter for other consultees.
4. I have made these recommendations having due regard for the NPPF and policy CS5 as well as saved policy CL2.

Yours sincerely

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Landscape Development Officer

Sue Hooton Senior Ecologist
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Your Ref: 3655/13
Our Ref:
Date: 05/02/2014

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Ms Elizabeth Truscott
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Dear Ms Truscott,

Proposal: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy from Waste Plant and the diversion of a Public Right of Way.

Location: Lower Dairy Farm, Bramford (Also part in the Parishes of Great & Little Blakenham)

Based on the information provided by the applicant and a site visit carried out on the 15th January, I offer the following comments:

The application

The ecological assessment (RPS December 20134) has considered most of the impacts from the proposal on both designated sites/ priority (BAP) habitats and protected/priority (BAP) species and provided appropriate mitigation as well as enhancement measures. However there is a deficiency regarding the likely impacts on farmland species and possible impacts on water birds.

The proposed enhancements for biodiversity such as the creation of habitats are reasonable and should provide opportunities for local wildlife to thrive.

The sensitive nature of some of the species records would also have been better served by the production of separate confidential appendices. I will submit my comments relating to this under separate confidential email.

Likely Ecological Impacts

The main direct impacts of the proposal identified are on bats (with the hedgerow along Pound Lane being an important commuting route), Gt crested newts and badgers.

I consider that the following potential impacts have not been adequately covered by the ecological assessment:

- Farmland specialists such as skylarks and hares (both priority (BAP) species
- Given the proximity of Bramford Water Park CWS, water birds may confuse large areas of grass with water.
- It is also likely that there will be indirect and cumulative impacts eg disturbance from the installation of the East Anglia ONE cable route, which should be assessed before determination. It should be possible to rectify these omissions without additional detailed ecological surveys as long as the likely impacts are assessed.

Summary

In conclusion, pending assessment of impacts identified above as missing, the proposal is not considered likely to result in any significant impacts on biodiversity.

The delivery of all the ecological mitigation measures and enhancements should be secured by planning conditions so that the proposal is likely to result in an overall gain for biodiversity.

There are opportunities to minimise the impacts and measures are likely to be needed to offset impacts on farmland species, which will be outside the application boundary and require a section106 agreement.

It appears that, subject to robust and effective conditions, the proposal can therefore be made acceptable in terms of ecological impacts and the proposed enhancements for biodiversity are reasonable.

There is however a need for a significant number of detailed changes to be made to the landscaping & ecological proposals, in order to deliver the appropriate ecological mitigation and enhancements.

Recommendations

Should the LPA be minded to support the proposal, I suggest that the following conditions are required;

1. To deliver the master plan, the preparation of a Construction and Environmental Management Plan (CEMP), as defined in BS42020:2013 Biodiversity – Code of practice for planning and development, should be a **pre-commencement** condition. A detailed scheme of ecological mitigation/enhancement should be included in the CEMP, which will cover other issues such as soil management and arboricultural issues etc, and implemented in the first available season.

However I note the following issues in relation to the master plan which will require clarification or revision:

- i. As there is a discrepancy between the Proposed Site Layout (NK017563 B) and the Landscape Masterplan (2208/100 D) regarding the creation of grassland within the development, this must be resolved. One plan indicates acid grassland and the other neutral grassland, however chalk grassland would be more appropriate for this habitat creation proposal as it would provide connectivity with adjacent chalk grassland. Further details are needed on the creation and management of these areas, particularly as there seems to be an indication that scrub will be allowed to develop and must be provided as part of the CEMP.

- ii. The applicant needs to ensure that the new woodland areas are adequately protected from deer by fencing and should provide these details to the LPA as part of the CEMP. Given the need for this planting to thrive, it is not clear that adequate methods of protection are being proposed, particularly for the Scots Pine trees.
 - iii. The planting scheme includes species that are unlikely to thrive in this location, for example holly, or are inappropriate, for example beech. After discussions with the Landscape Officer, I suggest the following locally appropriate replacements are made for the planting proposals: replace all Holly with Common Dogwood, all Beech with Hornbeam and all Rowan *Sorbus aucuparia* with Wild Service Tree *Sorbus torminalis*.
2. A detailed scheme of external lighting should be agreed in writing with the LPA as a **pre commencement condition**, which should include a lux plan to demonstrate compliance is deliverable. The use of LED and/or full cut of lighting are likely to be an effective approach, to reasonably minimise the impacts on bats.
 3. A detailed scheme of measures should be agreed in writing with the LPA as a **pre commencement condition** to minimise the impact of the internal lighting of the glasshouses for the same reasons as 3 above.
 4. I note that cutting a footpath through the existing woodland belt adjacent to northern greenhouses; this will require control of the ecological and arboricultural risks associated with this proposal, particularly protected species. This must be provided as part of the CEMP.
 5. I have made a confidential recommendation regarding mitigation and site management a sensitive protected species, which must be provided as part of the CEMP under a confidential appendix. I have sent these comments by separate email cover which must not be placed in the public domain.

Reasons

I have made these recommendations in order to reasonably minimise the impacts of the proposal on the ecology and having due regard for the NPPF and policy CS5.

Yours sincerely

Sue Hooton
Senior Ecologist

Your Ref: 3655/13
Date: 7th February 2014
Enquiries to: Robert Feakes
Tel: 01473 260454
Email: robert.feakes@suffolk.gov.uk

Elizabeth Truscott
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Dear Ms Truscott,

Application 3655/13: Erection of two greenhouses, associated ancillary infrastructure, provision of a pipeline to the Great Blakenham Energy From Waste Plant and the diversion of a Public Right of Way, Land at Dairy Farm, Loraine Way, Bramford

Thank you for consulting Suffolk County Council on the above proposal.

The District Council should be aware that the County Council has an indirect financial interest in this proposal, because of the link to the Energy from Waste Plant. The County Council is very mindful of its responsibilities as a statutory consultee and the need for it to act in an objective and impartial manner.

Notwithstanding this indirect interest, in line with our Creating the Greenest County objective and given the potential for growth in the food sector described by the Suffolk Growth Strategy, the County Council would normally support proposals of this kind in principle.

The following comments are provided as objective and independent comment in relation to Suffolk County Council service responsibilities, to ensure that this proposal represents sustainable development in line with Mid Suffolk's local plan policies.

Air Quality and Noise

For both noise and air quality, the only concern specific to the County Council's responsibilities would relate to traffic movements, including HGVs during construction and operation. Additional operational HGV movements at 20 two way movements (10 in and 10 out) per day are below the thresholds for assessment for both noise and air quality and the overall additional numbers of vehicle movements, including light vehicles, are not considered to be significant. The same also applies during the construction period. The County Council therefore has no concern or requirements for mitigation.

Mid Suffolk District Council's Environmental Protection Team will address any other noise and air quality matters arising.

Archaeology

This major development lies in an area of high archaeological interest recorded in the County Historic Environment Record. However, the whole area has not been subject to systematic archaeological survey or assessment.

At least one ring ditch, probably the remains of a Bronze Age barrow, is recorded by air photography within the proposed development area (HER no. BLL 001). Bronze Age features have been defined by trenched evaluation adjacent to the south-west corner of the site (BRF 068). In addition, various Roman metal-detected finds have been recovered within the area.

There is high potential for the discovery of important unknown heritage assets of archaeological interest in view of its proximity to known remains and also given the landscape setting within the valley of the River Gipping. This location is topographically favourable for early occupation of all periods.

In order to establish the full archaeological implications of this area, the applicant should be also required to provide for an archaeological field evaluation of the site, *prior to determination of the application*. The area cannot be properly assessed, and outline consent approved, until a preliminary archaeological evaluation has been undertaken, in accordance with paragraphs 128 and 129 of the National Planning Policy Framework (2012) and Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008). The results of the pre-determination evaluation should inform the development to ensure preservation *in situ* of any previously unknown nationally important archaeological remains within the development area.

In terms of predetermination field evaluation, a geophysical survey should be required followed by (again, predetermination) a limited (1% sample) trial-trenched evaluation to test the results of the geophysical survey. Further trenched evaluation is then likely to be required if consent is forthcoming. Suffolk County Council's Archaeological Service has provided a specification for this field evaluation (dated 8/11/13), although the work has not been undertaken nor has the Written Scheme for the work been approved.

Developers need to be aware that, should consent be granted, they will be required to fund the archaeological investigations (further evaluation, excavation, post-excavation assessment, analysis and reporting, archiving and display, and appropriate community activities).

Ecology and Biodiversity

The information presented by the applicant

The applicant appears to have carried out a reasonable assessment of the likely ecological impacts of the proposal. The ecological assessment has addressed the impacts on both designated sites/ priority (BAP) habitats and protected/priority (BAP) species and most have been thoroughly considered with mitigation & enhancement measures identified. However there are gaps in its coverage regarding farmland and water birds that need assessing to identify the likelihood of impacts. The sensitive nature of some of the species records would also have been better served by the production of separate confidential appendices.

The site and its ecology

The site is mainly arable, with small areas of other habitats supporting protected species. The connectivity of and between habitats is important for biodiversity, and so the impact of this development on connectivity with designated sites nearby is an important consideration. The farmland nature of the site may support priority (BAP) species such as skylarks & hares and the adjacent Bramford Water Park County Wildlife Site is designated for its value to waterbirds.

The impacts on biodiversity

The main direct impacts of the proposal identified are on Bats (with the hedgerow along Pound Lane being an important commuting route), Great Crested Newts and Badgers.

However, given the nature of the land involved and the proximity to the Bramford Water Park County Wildlife Site, the County Council is concerned that the potential impacts on farmland specialists has been underplayed and potential impacts on water birds (possibly confusing large areas of grass with water) are not covered by the ecological assessment. It is also likely that there will be indirect and cumulative impacts (such as disturbance from the installation of the East Anglia One cable route) which should be assessed before determination. It should be possible to rectify these omissions without additional detailed ecological surveys, as long as the likely impacts are assessed.

The proposed ecological mitigation and enhancements

Depending if mitigation is required or enhancements are considered appropriate, measures such as skylark plots could be provided with this application. If considered necessary, any mitigation for waterbirds using Bramford Water Park County Wildlife Site should be deliverable.

Although the proposed ecological mitigation measures have been broadly translated in the *Landscape Master Plan fig 7*, details for the proposed habitat creation (hedgerows, grassland & ponds) and management require further thought. These are some significant aspects which will need to be amended to ensure that local character is maintained and appropriate management is provided.

The proposed enhancements for biodiversity such as the creation of habitats are reasonable and should provide opportunities for local wildlife to thrive.

The delivery of all the ecological mitigation measures and enhancements should be secured by planning conditions so that the proposal is likely to result in a net gain for biodiversity, in line with the National Planning Policy Framework.

Summary - ecology and biodiversity

The proposal is not, pending assessment of impacts identified above as missing, considered likely to result in any significant impacts on biodiversity. However, full and comprehensive implementation of all mitigation measures identified will be necessary to achieve this outcome. A detailed review of the proposal may reveal further opportunities to minimise the impacts. It appears that, subject to robust and effective conditions, the proposal can therefore be made acceptable in terms of ecological impacts and the proposed enhancements for biodiversity are reasonable.

There is a need for a significant number of detailed changes to be made to the landscaping proposals, in order to deliver the appropriate ecological mitigation and enhancements. It is likely that most of these issues can be resolved at the condition stage although it may also be appropriate, in some instances, for the local planning authority to establish revised principles of the landscaping, with the applicant, prior to determination.

Fire and Rescue

The Suffolk Fire and Rescue Service has already responded under a separate cover (dated 9th January 2014), and has not raised an objection to this proposal, provided that standard conditions are applied.

Landscape Assessment

Based on the information provided by the applicant and in discussion with and following site visits by relevant staff from the County Council's Natural Environment team, the County Council offers the following comments.

The information presented by the applicant