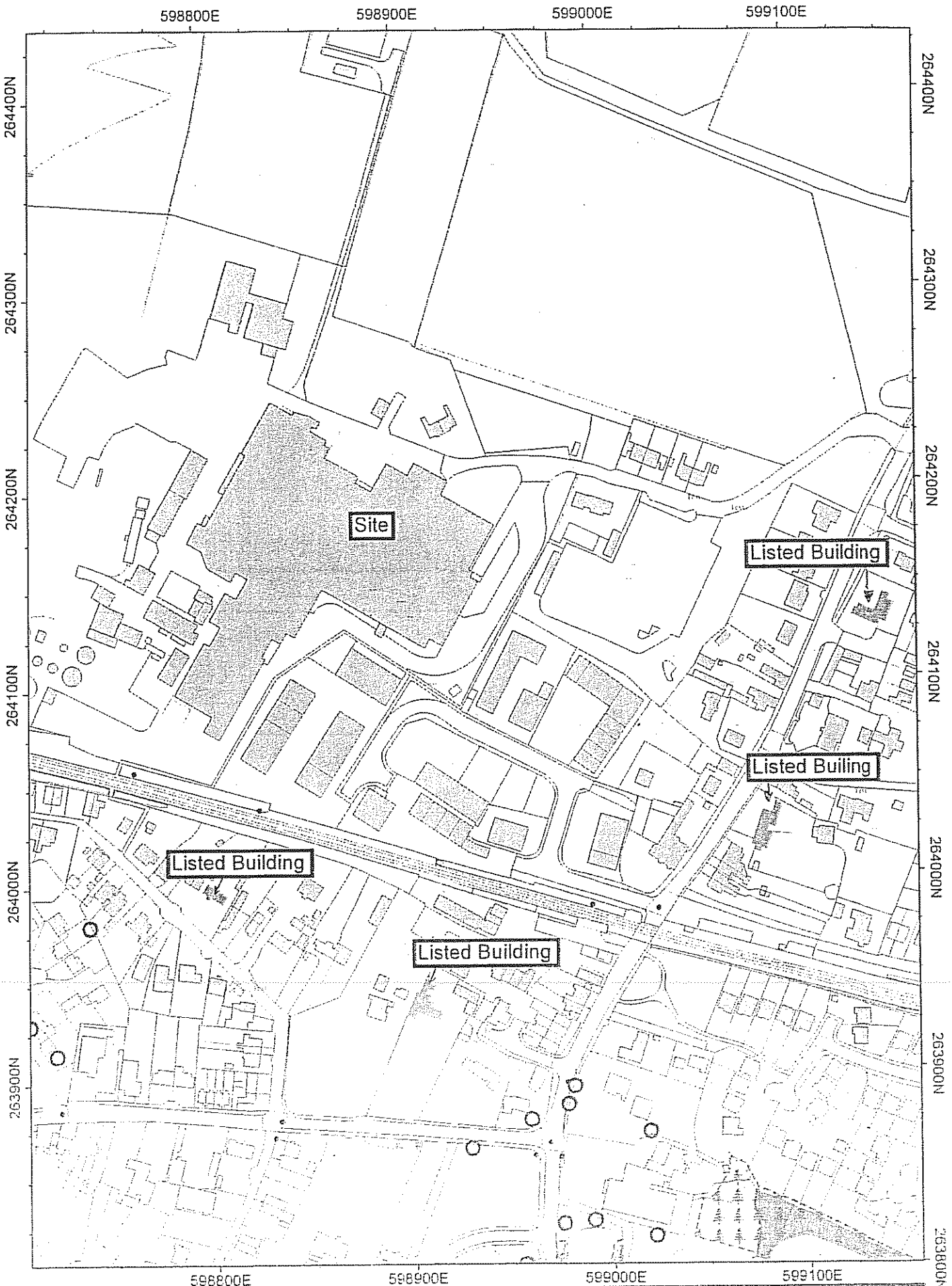


32
MSDC Committee Constraints 0846/13



- Site Area
- Land also in ownership



- Legend**
- Apartment Boundary
 - Land Use Control
 - Land reserved for L&P Road
 - Retained Use
 - Public Open Space
 - Public Open Space at First of Water Scheme
 - Buffer Planning
 - L&P Road
 - Avenue Use Planning
- 1 Primary Road
 - 2 Secondary Road
 - 3 Shared Surface
 - 4 Court Yard
 - 5 Private Drive
 - 6 Entry Driveway
 - 7 Proposed Driveway of Access (Proposed)
 - 8 Proposed Emergency Access/ Driveway
- Vent
 - Link to Open Space
 - Road of Proposed L&P Road
 - Proposed Driveway of Access (Proposed)
 - Retention of existing layout



Former Grampian Food Site , Elmswell



Note
 Visibility Sights shown are taken from Main Road for Streets

- Key
- Ownership Boundary
 - Highway Boundary
 - Visibility Sights



Large Refuse Vehicle (LRV)

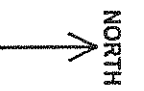
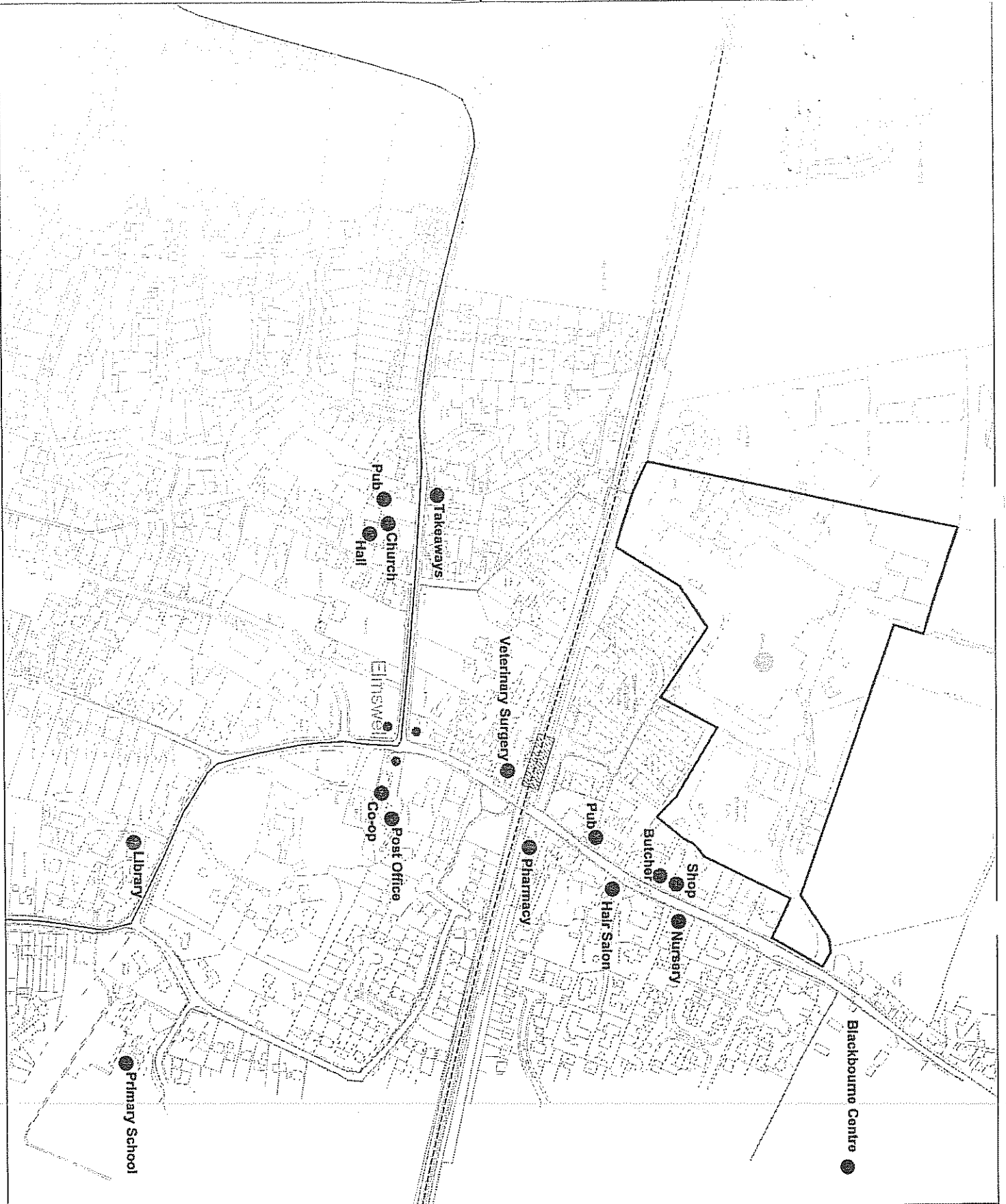
- Overall Length 14.0m
- Overall Width 3.1m
- Overall Body Height 2.9m
- Min Body Ground Clearance 0.4m
- Load to Lock Time 8.500m
- Ref to Kerb Turning Radius

Ref. L. 14.0x3.1
 Actual height for any overhanging structure
 Zone crossing marked
 Height 0.125x14
 Access (not fully) marked (both ways) Crossing point side
 Ref. D. 12.21x14 1.20m high, 1.20m wide from 1.10m
 Height 1.20x14
 Internal height above 1.20m high, 1.20m wide turning point
 Ref. C. 22.0x14
 Internal height above 1.20m high, 1.20m wide
 Ref. D. 22.0x14
 Overall height above 1.20m high, 1.20m wide
 Ref. C. 01.0x11
 Visibility sight beyond 0.15m (width) from 1.20m x 1.10m
 Ref. B. 10.0x11
 Minor features

PHIL JONES ASSOCIATES
 Planning & Design
 140-150 Tottenham Court Road, London W1P 0LP
 Tel: 01753 222 227 Fax: 01753 222 221
 www.philjonesassociates.com

Harrow Estates
 Former Grampian Country
 Foods Site, Elmwell
 Proposed Site Access

Drawn by **JK** Date: 28/11/13 Scale: 1:1000 (D.A.)
 Project No. **947-02** Revision **K**



Key:

- Site boundary
- Rail station
- Rail line
- Bus route
- Main footpaths
- Employment
- Bus stop
- Local facilities (specified on plan)
- Centre of site

PHIL JONES ASSOCIATES
 The London Dock, London, SE11 5JH
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 Fax: 020 7417 4401
 www.philjonesassociates.co.uk

Harrow Estates
 Former Gramplan County Foods Site, Elmswell

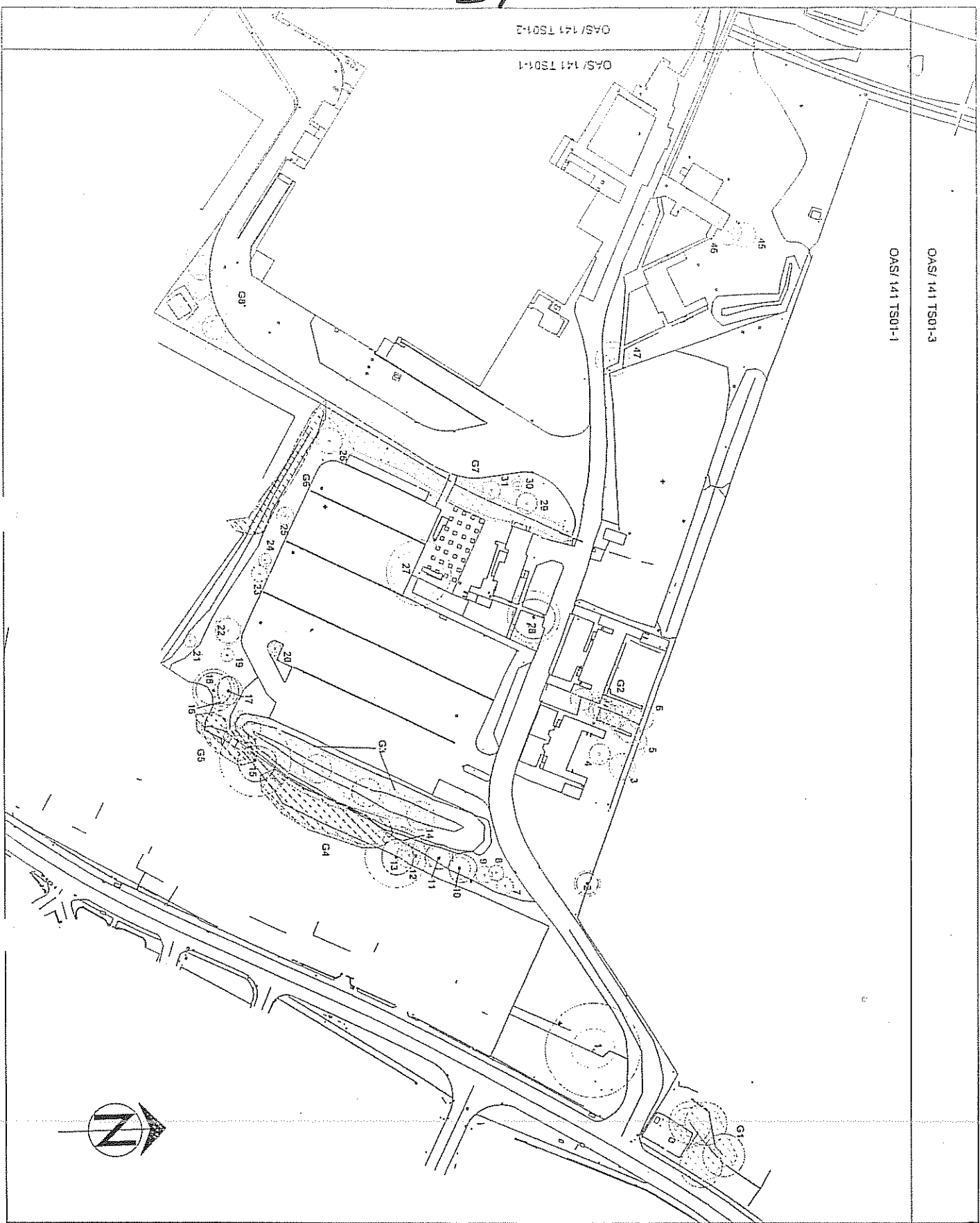
Local Facilities & Sustainable Transport

Scale: 1:500	Scale: 1:1000	Scale: 1:2000	Scale: 1:5000
Sheet No. 50	Sheet No. 51	Sheet No. 52	Sheet No. 53
Drawing No. TA Fig 2.1			B

OAS/141 TS01-3

OAS/141 TS01-1

OAS/141 TS01-1
OAS/141 TS01-2



KEY

- Existing Tree, either preserved in accordance with BS 5837 2005 or shown as new
- Green - Cat A trees of high quality and value
- Green - Cat B trees of moderate quality and value
- Green - Cat C trees of low quality and value
- Red - Cat U trees that are dead or showing signs of irreversible decline
- Red - Proposed Area of Retention in accordance with BS 5837 2005
- Existing line or group, approximate location as shown on part of representative land survey
- Existing hedge or group, approximate location as shown on part of representative land survey

Arboreal Notes

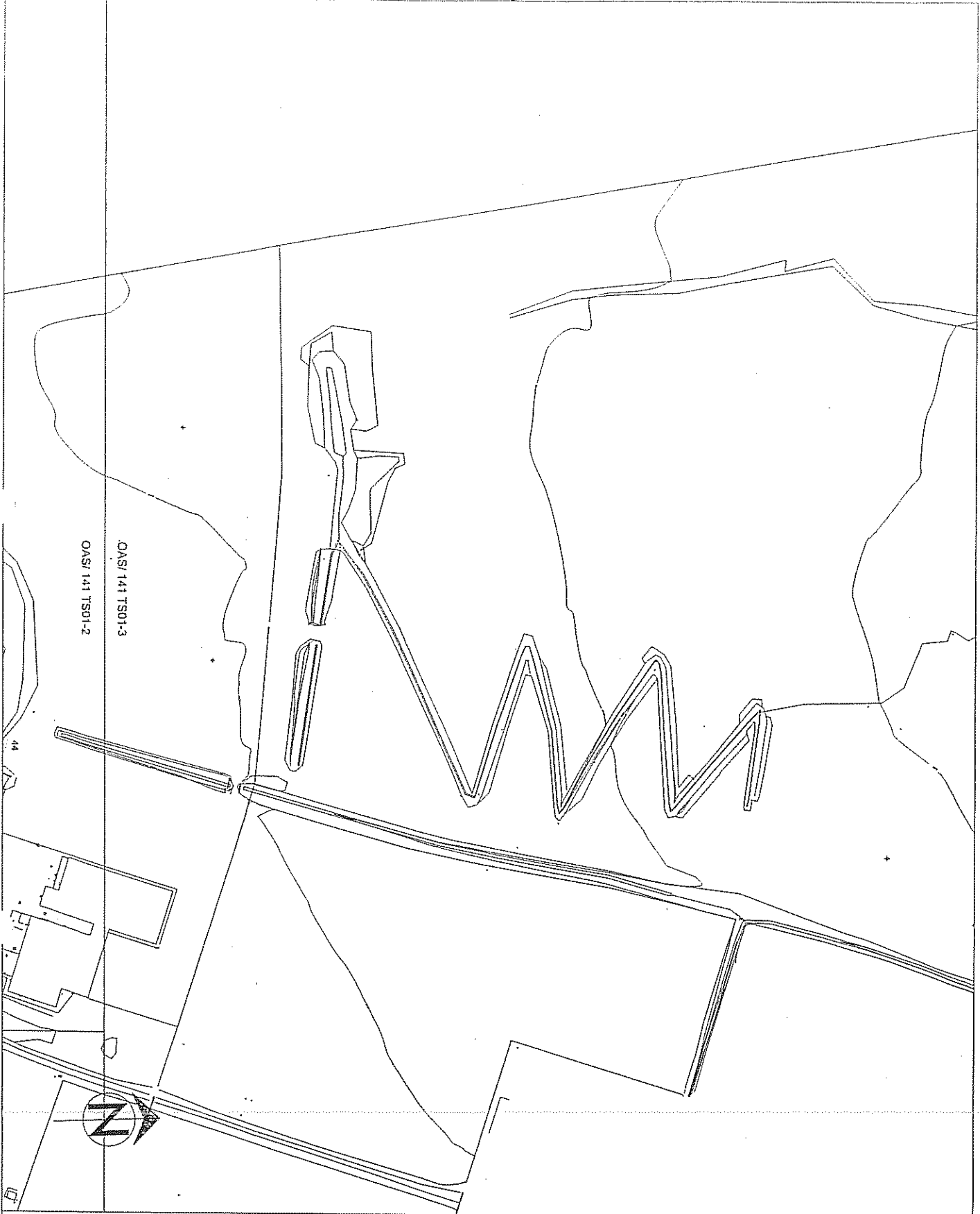
This plan has been prepared to assist in the design of development works. With reference to BS5837 2005 'Trees in relation to construction - Recommendations for BS', the plan and accompanying report identify the quality of trees and the proposed retention areas. The quality of trees should be assessed on the basis of their size, form, species, and the condition of their trunk and canopy. The condition of trees should be assessed on the basis of their size, form, species, and the condition of their trunk and canopy. The condition of trees should be assessed on the basis of their size, form, species, and the condition of their trunk and canopy.

The symbols provided in the plan are of 2011 but contain technical coding data to assist in the retention and should ideally be included on any construction drawings. The use of appropriate fencing, however, should be provided to the site to ensure that attention is drawn to the facility within the site that allows for the BS to be measured against a tree to a tolerance of 200mm. Where the BS is not indicated in relation to a tree, the BS should be indicated in relation to a tree. The BS should be indicated in relation to a tree. The BS should be indicated in relation to a tree.



Project Name:	Site Ref:
Client:	Scale:
Author:	Date:
Check:	Drawn:
Approved:	Issue:

Please do not trace off this drawing



KEY

- Existing Tree - Referenced in documents with 03 5837 2003 on sheet below
- Green - Call A Trees of high quality and value
- Blue - Call B Trees of moderate quality and value
- Grey - Call C Trees of low quality and value
- Red - Call D Trees that are dead or showing signs of irreversible decline
- Red - Best Protection Area as stipulated in documents with 03 5837 2003
- Yellow - Existing trees of good appearance located within the Best Protection Area
- Yellow - Existing trees of good appearance located outside the Best Protection Area
- Existing hedge or grass, colour coded as shown in documents with 03 5837

Arboreal Notes

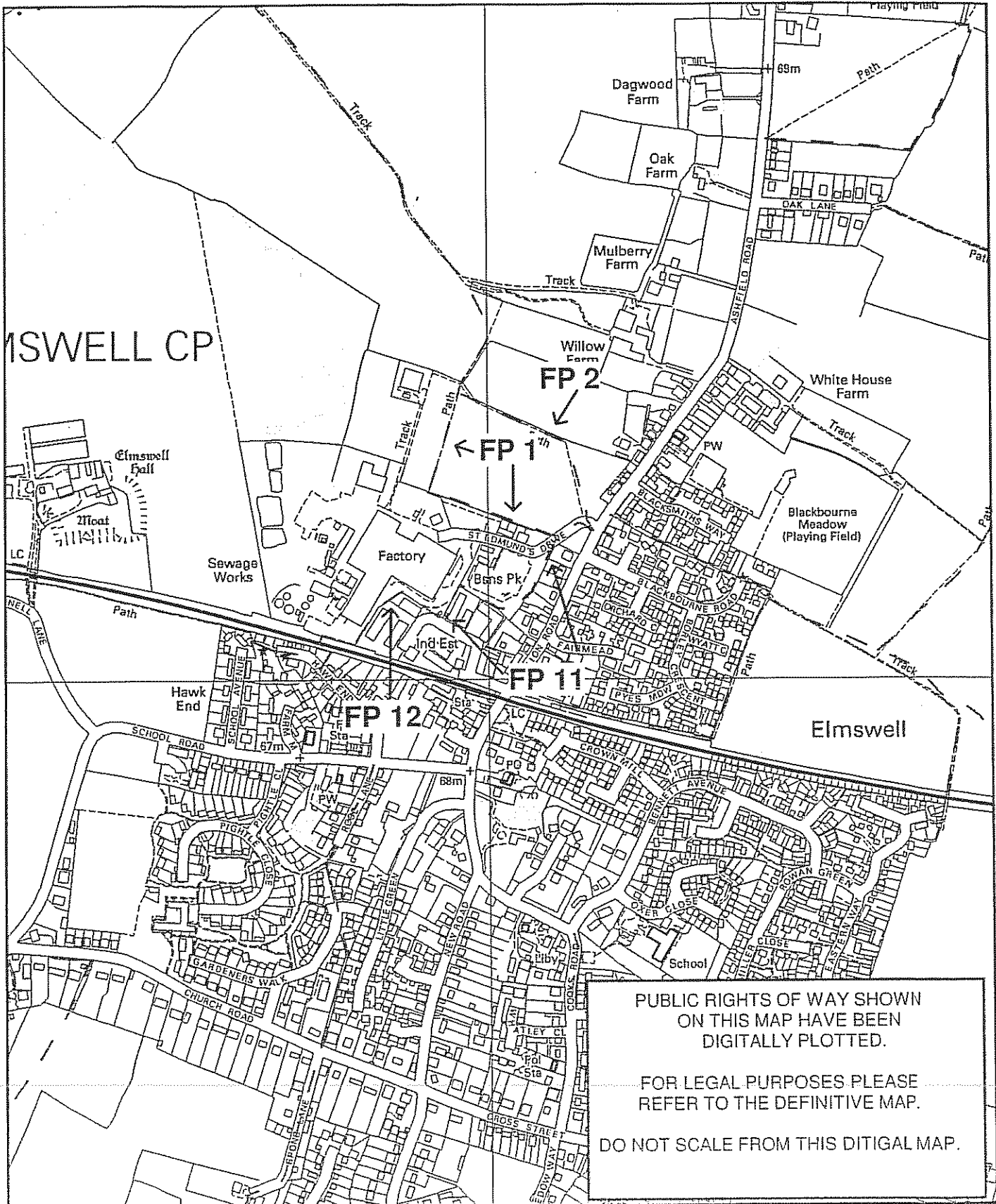
This plan has been prepared in accordance with the Arboricultural Act 1980 and the Arboricultural Code of Practice 2013. The plan and accompanying report identifies the quality of the site's significant vegetation, its contribution to public amenity and the constraints particular to any offer to the site in terms of proposed development.

With reference to the 11 existing trees and to Category 1 trees, the proposed development should be considered for removal irrespective of development potential. Category 2 trees are those which would not normally be considered a worthwhile constraint on proposed development. Category 3 and 4 trees are those which make a long-term and substantial contribution to the character and appearance of an area and should therefore usually be retained.

The specific mitigation measures in 2 of the values of soil that contain sufficient rooting trees to meet the removal of a tree. This is the area around trees to be retained that should ideally be enclosed completely from construction activities by the use of appropriate fencing. Wherever should trees of the BPA be accessible year-round attention is given to the facility within the BPA that allows for a tree to be removed around a tree to a minimum of 20m from the tree. The removal of a tree should be undertaken in a way that allows for the tree to be replaced. In addition attention is also made within the BPA for tree construction within the BPA but this will be subject to arboricultural assessment and implementation of specially engineered construction methods.

NO.	DATE	BY	REVISION
1	10/01/2024	J. Smith	Issue for approval
2	15/01/2024	J. Smith	Final design

Please do not scale off this drawing

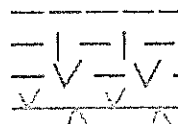


0846/13 Former Grampian Harris, St Edmunds Drive, Elmswell
 Public Footpaths No. 1, 2, 11 and 12



Suffolk
 County Council

Lucy Robinson,
 Director of Economy, Skills and Environment,
 Endeavour House, E Russell Road, Ipswich, Suffolk, IP1 2BX



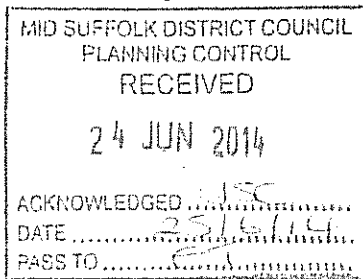
Ordnance Survey MasterMap

Public Footpath
 Bridleway
 Restricted Byway
 Byway
 Definitive Map Parish Boundary

Scale 1:7500



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Your ref: 0846/13
Our ref: SQ79000001
Tel: 01603 229407
Email: graham.bloomfield@bidwells.co.uk
Date: 24 June 2014

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

16 Upper King Street
Norwich NR3 1HA
t: 01603 763939
f: 01603 763859
bidwells.co.uk

Dear Elizabeth

Email and post

Application 0846/13: Former Grampian Harris, St Edmunds Drive, Elmwell - Development Viability and Opportunities for Employment Uses

I am writing on behalf of my client Harrow Estates further to our recent meeting on 17 June 2014, where we discussed the outstanding matters ahead of determination of the planning application at the committee meeting of 16 July. A particular issue requiring further attention was the request from Members at the Development Control Committee on 07 May for their Officers to take forward discussions on incorporating employment/commercial elements as part of a mixed use scheme.

As detailed at our recent meeting, our stance is that we do not wish to revise the submitted application for residential development. This is on the following grounds, which are set out further below:-

- There is no planning policy justification (including relevant material considerations);
The site has been redundant for some time;
There is limited demand for commercial units;
It would render the scheme unviable where this is finely balanced; and
Residential development generates significant employment opportunities.

Lack of planning policy justification

The submitted Planning Supporting Statement sets out the strong planning case for residential redevelopment of this site and it is not intended to repeat that information here. The Committee report for 07 May confirms the principle of residential development is fully acceptable in accordance with the Core Strategy (including focussed review) and the Framework. The Committee Report correctly confirms that limited weight can be applied to Local Plan policies that look to retain employment areas given their inconsistency with the Framework.

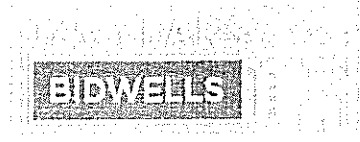
Subsequent to the submission of the planning application, there has been a continued emphasis from the Government on their support for housing as a key focus on improving the economy and generating jobs and employment. The most recent announcement from the Treasury in a speech by George Osborne on 12 June 2014, defined a pre-approval process on brownfield sites for housing so that the principle is confirmed as acceptable by default.



INVESTORS IN PEOPLE | Bronze



Application 0846/13: Former Grampian Harris, St Edmunds Drive,
Elmswell - Development Viability and Opportunities for
Employment Uses
24 June 2014
Page 2



Fundamentally there would be no grounds to refuse planning permission due to the lack of an employment/commercial element and a wholly residential scheme is acknowledged as being fully compliant with planning policy.

It should also be clarified that at no stage have the Harrow Estates proposals included a commercial or employment element.

Site has been redundant for some time

The food processing factory ceased production in June 2006 and, therefore, the site has remained vacant for the last 8 years. In that time, we are not aware of any proposals that have been brought forward for employment or commercial use, with all prospective development proposals being residential-led schemes. We would contend that there if there was a viable commercial/employment use then this would have been included within previous schemes and/or including re-use of the existing buildings.

There is limited demand for commercial units

We have spoken with the Bidwells commercial team and also other local agents given that Bidwells are not particularly active within Suffolk in general, and locations like Elmswell in particular, due to lack of demand.

The view from both Bidwells and local agents is that currently no-one is building speculative units without an end-occupier lined up and that it would be a significant gamble to do so. Certainly in more prime locations such as Bury St Edmunds and Norwich, this is not taking place and realistically within the region this can only be sustained within Cambridge, which currently operates within something of an economic bubble akin to London.

Local agents have advised of properties currently or recently marketed in Elmswell. A 10,000 sq ft unit on the Grove Land industrial estate has been on the market for 6 months with little interest and was vacant for a further 6 months prior. A neighbouring unit of a similar size took around 3 years to agree a deal on and this was very much at the lower end of the market in comparison to a more expensive new-build development.

A more general sweep of properties for rent within 10 miles of Elmswell brings up 61 commercial properties from a 100sq ft office to a 26,607 sq ft warehouse. There are also 11 commercial properties for sale within that distance. Further commercial/employment development is proposed at Eye Airfield (38.4ha), Thorney Park, Stowmarket and Stowmarket Business and Enterprise Centre (39.5ha).

Certainly the market view is that if/when there is a need for commercial development within the District, this would take place in a more of prime location than Elmswell.

It would render the scheme unviable

The economics of the development and S106 contributions have been agreed in discussions with your colleague Richard Larbi and the scheme's overall viability is finely balanced. It was agreed in the recent meeting on 17 June that the introduction of employment and commercial activity would see significant reductions in S106 contributions and effectively renders the whole scheme unviable. It was agreed in that meeting that employment and commercial use would be undesirable on that basis.

Residential development generates significant employment opportunities

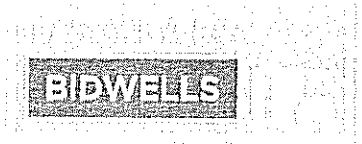
It is important to recognise the employment opportunities generated by development itself in the construction and manufacturing sectors. Research (The Labour Needs of Extra Housing Output) carried out

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Application 0846/13: Former Grampian Harris, St Edmunds Drive,
Elsmswell - Development Viability and Opportunities for
Employment Uses

24 June 2014

Page 3



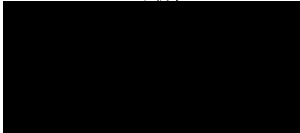
by Professor Michael Ball of the University of Reading on behalf of the HBF and CITB-Construction Skills for Kate Barker's review of housing supply concluded that 1.5 workers per dwelling were directly engaged in the housebuilding process, including office staff and wider professional support associated with development, plus up to 4 times that many people indirectly in the wider supply chain.

In referencing the employment opportunities relating to housing it should be noted that these are more definitive with a greater certainty to delivery than the speculative commercial/employment uses defined above.

In addition, we are prepared to consider diverting some of the funds from the S106 'pot' to improved broadband performance to support home-working and discussions are continuing / will continue if this is acceptable to Members.

I trust this sets out our position with regard to commercial/employment use and a strong justification as to why this can not be offered as part of the development proposals. However, please do not hesitate to contact me should you wish to discuss further.

Yours sincerely



Graham Bloomfield BA (Hons) MA MRTPI
Principal Planner

Copy Tim Booth - Harrow Estates

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Richard Larbi - viability officer

Viability – Impact of provision employment on site

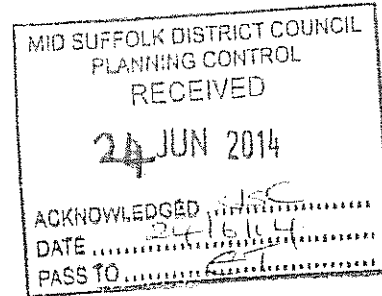
An acre of land which is approximately to 11 houses on site would be equivalent to the provision of employment facilities on site. A mixed use option renders the proposed development unviable with a deficit of £600,000 in the current viability.

An income, should there be a demand would be worth £150,000 to £175,000 per acre.

45

Your Ref: MS/0846/13
Our Ref: 570\CON\2497\13
Date: 24 June 2014
Enquiries to: PeterBlack
Tel: 01473 265191
Email: peter.black@suffolk.gov.uk

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



For the Attention of: Elizabeth Truscott

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/0846/13**

PROPOSAL: Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)

LOCATION: Former Grampian Food Site, St Edmunds Drive, Elmswell, Bury St Edmunds, Suffolk

ROAD CLASS:

This response is further to my email dated 13 May 2014 which listed my 2 outstanding concerns, the inclusion of freight trains in the level crossing survey and the proposed zebra crossing.

The survey undertaken in June 2012 did not specifically mention freight trains. A new level crossing survey was therefore conducted on 5 June 2014 which shows passenger and freight movements within the peak periods.

The new survey also shows a greatly reduced queuing figure. There was no explanation given for this reduction in queue lengths. Looking at the data it appears that the down time on the level crossing barriers has been reduced. A reduction in the down times would lead to lesser queues building up.

The new survey in June 2014 shows the passenger trains, corroborated from the time tables, and the freight train movements. It shows that the queues at the level crossing have also reduced in length.

The biggest impact at the level crossing will be southbound in the am peak and northbound in the pm peak. The development will generate a traffic flow of 99 vehicles in the am and 87 vehicles in

the pm peak. These flows will be staggered over the peak hour. The impact on the queues at the level crossing will therefore be minimal. The National Planning Policy Framework (NPPF) paragraph 27 states 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of a development are severe'. The increase in traffic that this development will cause cannot be classed as severe. Further developments that may come forward may cause a greater impact on the level crossing and its safety in operation and therefore may be refused.

The proposed zebra crossing on Station Road was in a position between two accesses where drivers could get distracted which could lead to collisions. For us to accept a zebra crossing at this location we would require a safety audit.

The applicant has removed this zebra crossing from the proposals. The removal of this crossing is acceptable provided it is replaced with an informal crossing point, with dropped kerbs and tactile paving, in the same location.

With the inclusion of the freight trains, the decrease in the queue lengths and the removal of the zebra crossing, the proposed development is acceptable.

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

1 AL 3

Condition: The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No. 947-02 Rev J and made available for use prior to Occupation. Thereafter the access shall be retained in the specified form.

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

2 V 1

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 947-02 Rev J and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

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

3

Condition: Before the development is first occupied the proposed footway link to the industrial estate shall be provided to details which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To provide a sustainable link to the development.

4 NOTE 02

Note 2: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

The County Council's Central Area Manager must be contacted on Telephone: 01473 341414.

Further information go to: www.suffolk.gov.uk/environment-and-transport/highways/dropped-kerbs-vehicular-accesses/

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

5 NOTE 15

Note: The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

This application is for the access only therefore no internal layout or details have been agreed and no comments made on the internal details.

Yours faithfully

Mr Peter Black
Development Management Engineer
Highway Network Improvement Services
Economy, Skills & Environment

Planning application Former Bacon Factory Elmswell ref 0846/13.

Corporate Manager Economic development and Tourism

This site has been the subject of debate for some considerable time.

It is clearly a brown field employment site which has stood empty for a number of years.

The main issue with it is the access from the A14 is via the village and level crossing which is increasingly causing congestion and delays.

Reinstating employment uses on this site would increase the problem at the crossing.

Early discussions with the parish and developers suggested that the best solution would be to concede employment on the site in exchange for the construction of a bridge and relief rd alleviating the level crossing. This would open up the access to, and create opportunities for employment further along Ashfield rd at Grove lane.

However, viability assessments have made it clear that the costs of the bypass are prohibitive and unlikely to be achievable in the foreseeable future.

The Economic development team accept this is not a viable option but do expect an enhancement to the employment in the location notwithstanding the proliferation of the crossing issue if employment generating uses were to be included on site.

We therefore as a minimum propose that the residential units are all constructed with the benefit of fibre (FTTP) connections for enhanced broadband speeds which would be attractive to buyers who could work from home.

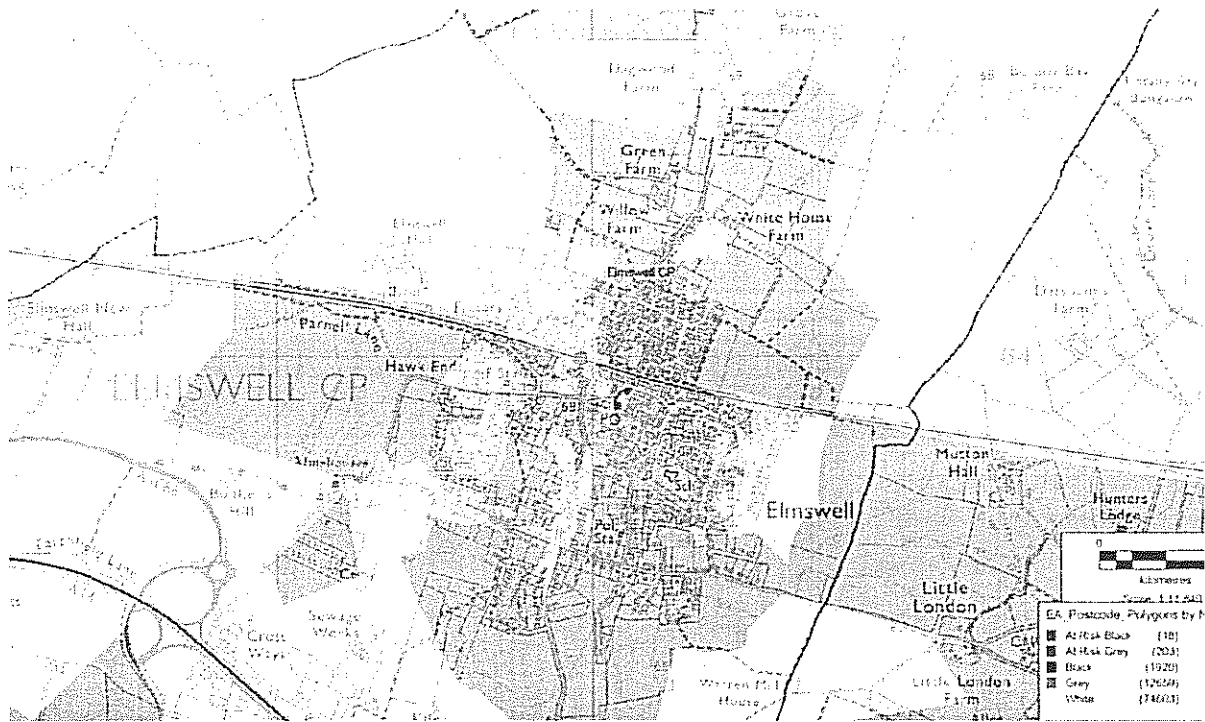
Likewise the adjacent station rd industrial estate is poorly connected with broadband and has not been included in the better broadband for Suffolk programme, given the connectivity within Elmswell itself has been mostly enhanced recently to 15Mbps.

There are 18 businesses located in Station rd and there is an average cost of £1,500 / unit + cabinet upgrade of £25-£50K. total approx. £50K-£70K.

The attached map for illustrative purposes shows the coverage in Elmswell.

The grey area shows current upgrade whilst the white has not.





MID SUFFOLK DISTRICT COUNCIL
 PLANNING DEPARTMENT
 RECEIVED
 20 JUN 2014
 ACKNOWLEDGED.....
 DATE.....
 PASSTO.....

50



Elizabeth Truscott
Senior Development Management Planning Officer
Babergh and Mid Suffolk District Councils

Network Rail
Elliot Stamp
Town Planning Technician
1 Eversholt Street
London, NW1 2DN

29/05/2014

Network Rail Consultation - 0846/13

Dear Elizabeth,

Following on from recent email and telephone discussions relating to planning application 0846/13, this letter presents Network Rail's position in relation to the application and responds to the outstanding questions put forward by Mid-Suffolk Council.

Network Rail has considered the Technical Note document prepared by the developer. The content of which has been taken into account when preparing the information below.

Hawk End Level crossing

Hawk End Level crossing is a public footpath crossing with stiles located approximately 400m from Elmswell station and Elmswell CCTV level crossing. The crossing traverses two lines and is 10m in length, equating to a user requirement of 9 seconds to traverse the crossing and a required sighting distance of 280m. There is currently sufficient sighting at this crossing.

Trains run frequently over the crossing with approximately 120 trains running at 75mph for 24 hours per day. The north side of the crossing leads to a disused factory and open fields whilst the south side leads to a residential area. Due to the location of the crossing and the poor accessibility north of the railway, there is currently low usage at the crossing, with one or two users per day.

Network Rail is committed to reducing the risk at our level crossings, please see attached Network Rail level crossing policy.

ALCRM

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model) which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which entails an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

The risk bands give an indication of where Network Rail's highest risk level crossings are, and provide a focus for the company. For example, a crossing with a score of A1 would have more focus for mitigation than a crossing with a D6.

Within the risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score of which Hawk End level crossing is currently 0.0000991535176 (C7). The last ALCRM assessment was undertaken in August 2013.

The proposed residential development of approximately 190 houses will see the risk score at this crossing to increase to an unacceptable level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

The development plans show that the path on the north side of the crossing will open up straight into the housing estate and provide an excellent link to the amenities on the southern side of the crossing which include the Co-op shop, Post office, Police station, Primary School and the main part of the village.

Although the developer acknowledges that the new development will increase pedestrian demand and have committed to providing an improved pedestrian link through to Station Road, it is anticipated that pedestrians who are accessing the amenities on the southern side of the crossing will use Hawk End crossing as a quicker route rather than being delayed at the CCTV crossing due to the barrier down time.

With estimated numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 6 to 9 Pedestrians users per day: C6 with a FWI of 0.000396614
- 20 Pedestrians users per day: C5 with a FWI of 0.000991535
- 50 Pedestrians users per day: C4 with a FWI of 0.002478838

In all of the above instances, there is an unacceptable increase in the risk profile at this level crossing and therefore unacceptable to Network Rail.

I appreciate that the council is looking for Network Rail to confirm the threshold (trigger) which determines when a footbridge would be required. Following advice from Network Rail's level crossing team, it is considered that any increase of usage at the crossing as a result of the development would require mitigation in the form of a footbridge to be introduced.

It should be noted that in determining the level of risk at a crossing, Network Rail uses ALCRM along with other resources such as experience and risk assessments. A number of different resources have been used to determine Network Rail's stance on this application.

Office for Rail Regulation (ORR)

The ORR regulates Network Rail in regards to its management of level crossings. Please see attached ORR level crossing guidance document.

I have extracted 3 paragraphs from page 5 of the attached document which outlines the ORR's level crossing policy and expectations.

2. ORR seeks to influence duty holders and others to reduce risk at Britain's level crossings. It does this through a variety of means ranging from advice to formal enforcement action. ORR checks that preventive and protective measures are implemented in accordance with the principles of prevention set out in the Management of Health and Safety at Work Regulations 1999. Risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges, underpasses or diversions. Where elimination is not possible, ORR aims to ensure that duty holders reduce risk so far as is reasonably practicable and in accordance with the principles of protection.

3. As the safety regulator for Britain's railways, ORR's role is to provide clear advice and enforce relevant legislation – including that which relates to level crossings. We also exercise the powers of the Secretary of State in making level crossing orders under the Level Crossings Act 1983. The Agency Agreement made between the Secretary of State for Transport and the Office of Rail Regulation relates to functions which ORR has agreed to perform on behalf of the Secretary of State. The Agreement is on ORR's website at http://www.rail-reg.gov.uk/upload/pdf/mou_ORR_DFT.pdf

4. ORR believes that it is neither effective nor efficient for only rail companies to be responsible for managing safety at level crossings. Decisions about level crossings should involve rail companies, traffic authorities and other relevant organisations as early on as possible. Relevant authorities should recognise the wider benefits that safety improvements at level crossings (for example, replacing them with bridges) can bring about, particularly for road users. If wider benefits can be achieved, the appropriate funding bodies should agree on how the costs of making safety improvements will be met.

Paragraph 4 explains that the ORR considers that decisions about level crossings should be made by all relevant parties.

In section 1.10 of the document the ORR states that there;

'Finally, there is a requirement in planning legislation for planning authorities to consult the Secretary of State and the operator of the network where a proposed development materially affects traffic over a level crossing. For example, a new housing development near a crossing may cause traffic levels over the crossing to increase greatly and mean that existing protection arrangements at the crossing are no longer adequate.'

It is evident that the ORR takes level crossings and Network Rail's management of the crossings extremely seriously.

There have been a number of cases where, due to safety issues with crossings, the ORR has taken formal enforcement action on Network Rail. This enforcement action can result in temporary speed restrictions being introduced along rail routes close to the crossings. Where crossings contain barriers, it is probable that the introduction of speed restrictions will result in an increase in barrier down time at the crossing, creating more issues including longer queues.

Although Hawk End crossing does not contain barriers, Elmswell CCTV level crossing does and therefore the length of time that the barriers would be down at this crossing could increase if a speed restriction was introduced.

Vulnerable Users and Sighting issues

The crossing will provide convenient access between the new and existing housing estates. It is anticipated that this will lead to an increase in usage of the crossing by vulnerable users such as children. Vulnerable users are more prone to distraction whilst using the crossing.

Vulnerable users include;

- People with physical and / or mental disabilities or other impairments
- Young children – unaccompanied or in groups
- Elderly people
- Dog walkers
- Cyclists
- People carrying heavy bags or large objects, with pushchairs etc.
- Non-English language speakers, e.g. migrant workers

The likelihood of a level crossing being used by vulnerable users can be influenced by its proximity to:

- Sheltered housing or care homes – residential and nursing
- Schools
- Stations
- Residential thoroughfares
- Busy high streets
- Parks, play areas, known walking areas
- Fixed local attractions, e.g. beaches, caravan sites

An increase in vulnerable users using the crossing would mean that Network Rail would need to conduct an additional risk assessment that focuses on vulnerable user's use of the crossing.

In order to take into account the distraction time of vulnerable users, the minimum required sighting distances at the crossing will increase. In this situation the distance will be increased from 280m to 418m. The available sighting distance from the south side of the crossing is 378m which is insufficient and fundamentally unsafe for any vulnerable user to cross.

Possible Mitigation Measures

The safest way to mitigate against the impact of the proposed development would be to close Hawk End level crossing, however, it is likely that this would not be feasible as it would require the extinguishment of the public right of way.

Therefore the construction of a new footbridge over the railway tracks, which would mean that the crossing could be closed, would be the safest option.

Network Rail's level crossing team has considered other mitigation measures such as Red/Green warning lights; however these have been discounted due to the close proximity to Elsmwell station. A red green warning light will give excessive warning of a red light to users of the crossing when trains stop at the station. This method of operation encourages misuse by users not willing to wait at a red light for extended periods of time and has resulted in a fatality at another location in the past year.

Delivery of Footbridge

Network Rail would seek to have the footbridge built and crossing closed before any increase in usage at the crossing from the development. To ensure that the development is not held back by the construction of the footbridge, the developer could apply for temporary closure of the crossing whilst the foot bridge is being completed.

The footbridge and related funding could be delivered through a Section 106 agreement.

To construct a footbridge at the site, Network Rail's level crossing team have estimated a cost of approximately £1m.

Conclusion

For the reasons detailed in this letter, Network Rail seeks the closure or bridging of Hawk End level crossing. If closure is not an option then Network Rail requests that the developer funds the construction of a new footbridge at the site.

Following this letter Network Rail would be open to meeting with the developer, council and all other interested parties to discuss any of this in more detail.

Please let me know your thoughts.

If you have any questions please contact me.

Kind regards,

Elliot Stamp

Town Planning Technician

Level crossing policy

Our policy for level crossings involves:

Reducing the number and types of level crossings

- We shall set and monitor annual targets for level crossing closures.
- We will rationalise the numbers and types of level crossings.
- If closure is not possible, we will seek to reduce risk and enhance safety - where reasonably practicable - at every opportunity.
- Closure will always be the priority consideration for any project or scheme that includes a level crossing or crossings within the scope.
- Only in exceptional circumstances shall we permit new crossings to be introduced onto the network.

Reducing level crossing risk

- We will consider all business risks when making level crossing enhancement and investment decisions.
- We will set and monitor annual targets for risk reduction.
- We will seek to modernise existing types of level crossings by designing out risk and introducing new technologies.
- Risk management practices will be revised to provide assurance that all risks identified are considered and actions taken are recorded.
- We will not seek to introduce any new Automatic Half Barrier crossings onto the network, where to do so would increase risk. Where a further technological improvement to reduce risk and improve safety is not available, we will rationalise this type of crossing at the point of renewal, or sooner, based on risk, opportunity and business benefit.
- We will continue to request and participate in research to reduce level crossing risk.
- We will continue to investigate, trial, and implement new technology, processes and techniques to improve safety.
- We will use tools such as the All Level Crossing Risk Model to inform and support us in our decision making.
- We will implement lessons learned from accidents and incidents.
- We will seek to present a consistent experience to the crossing user.
- We will prioritise those crossings with the greatest collective risk.
- The opportunity to improve safety and reduce or eliminate risk at level crossings should be included in all initial project remits, plans and development, irrespective of the projects predicted impact on level crossing risk.
- Our level crossing staff will be qualified risk practitioners with regular training and competence testing.

Ensuring level crossings are fit for purpose

- Level crossings will be well maintained in accordance with technical specifications.

Level crossing policy

- Level crossings will be risk assessed and inspected at specified regular intervals based on risk and usage.
- We will seek to reduce the number of multi disciplinary interfaces and create a system approach to management of the asset.
- If closure is not possible, life expired level crossings will be renewed incorporating the latest design and technology to reduce risk.
- At the point of renewal, or sooner, all Automatic Open Crossings locally monitored will be closed or replaced by a modern barrier type crossing.
- We will seek to introduce new technologies and utilise existing technology in alternative configurations to improve safety and create efficiencies based on risk, business benefit, whole life costs and asset condition.
- We will seek to increase automation in the operation of level crossings in order to enhance safety and reduce operating costs, providing high quality, consistent, information and guidance directly to users.
- Targeted renewal of component parts will be the preferred option until such time as the full renewal is required.
- Our technology strategy for level crossings will seek to introduce greater competition for lower cost commercially available products and expedite delivery timescales, approvals processes and standards development.
- We will seek to reduce costs and minimise; power, cables, lineside equipment and intrusive manual lineside maintenance, with the minimal interface with the existing signalling system.
- Our deliverability strategy will seek to standardise design and increase capabilities and competencies of internal and external contractors to install and test equipment.
- Technology solutions will focus on providing information to the crossing user directly.

Working with users and stakeholders

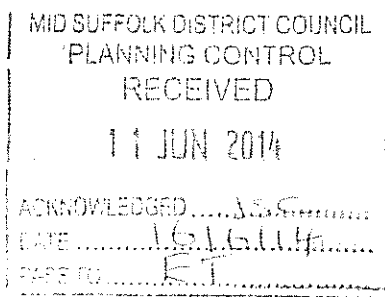
- We will educate users in the safe use of level crossings.
- We shall seek to involve users and stakeholders in risk assessments and developing controls to improve safety.
- We will regularly involve and inform our stakeholders of new technologies and developments in the management of level crossings.
- We will form partnerships and improve relationships with internal and external stakeholders to improve safety at level crossings.
- We will regularly communicate with our Authorised Users.
- We will work with corporate users to improve understanding and awareness of the safe use of level crossings.

Supporting enforcement initiatives

- We will help the BTP to develop strong Policing Plans and targets regarding level crossing risk.
- We will offer risk advice and intelligence to the BTP to help them to efficiently target level crossing misuse.

Level crossing policy

- We will support joint initiatives with BTP and other stakeholders to enforce level crossing and traffic laws and regulations.
- We will work with external agencies to maximise penalties and to introduce new sanctions for dangerous and deliberate acts of misuse at crossings.



58

0846113



PHIL JONES ASSOCIATES
transport planning consultants

Technical Note

Project: Former Grampian Country Foods Site, Elmswell

Subject: Further Transport Information

Client:	Harrow Estates	Version:	A
Code:	947	Author:	SP
Date:	10 June 2014	Approved:	ME

1 Introduction

1.1.1 Following discussions with Suffolk County Council (SCC), Phil Jones Associates (PJA) has been requested to provide further transport information in relation to the proposed redevelopment of the Former Grampian Country Foods Site, Elmswell. The note considers two areas:

- Updated highway assessment of level crossing on Station Road; and
- Provision of pedestrian crossing on Station Road.

2 Assessment of Level Crossing

2.1.1 It was agreed with SCC that a new survey of the Station Road level crossing would be undertaken in order to acquire more recent and detailed data. The survey was conducted on Thursday 5th June 2014 for the AM and PM peak periods. A report of the survey is appended to this note.

Table 2-1: Station Road Level Crossing Closures Survey Results

Barrier Down	Freight or Passenger	Direction	Stops at Station?	Barrier Up	Southbound Queues	Northbound Queues	Closure Time
07:32:50	Passenger	East	Yes	07:36:45	8	10	00:03:55
07:41:50	Freight	East	No	07:46:06	18	11	00:04:16
07:46:56	Freight	West	No	07:50:00	24	17	00:03:04
08:25:57	Passenger	West	No	08:27:52	14	5	00:01:55
08:32:43	Passenger	East	Yes	08:36:49	24	8	00:04:06
08:43:11	Passenger	West	Yes	08:45:28	5	9	00:02:17
09:04:51	Passenger	East	No	09:06:11	6	7	00:01:20
16:29:28	Passenger	West	No	16:31:28	12	5	00:02:00
16:35:53	Passenger	East	Yes	16:37:42	10	6	00:01:49
16:40:45	Passenger	West	Yes	16:42:55	6	12	00:02:10

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High Street, Longbridge
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TELEPHONE +44 (0) 121 475 0234
EMAIL admin@philjonesassociates.co.uk

WEBSITE philjonesassociates.co.uk

16:53:57	Freight	West	No	16:57:33	9	12	00:03:36
17:05:25	Passenger	East	No	17:06:55	12	16	00:01:30
17:33:53	Passenger	East	Yes	17:38:04	16	12	00:04:11
17:39:56	Passenger	West	Yes	Still down			
Still down	Freight	East	No	17:45:40	18	23	00:05:44
18:02:35	Freight	East	Yes	18:09:48	12	14	00:07:13
18:10:20	Passenger	West	Yes	18:13:12	12	6	00:02:52

2.1.2 PJA produced a Transport Assessment (January 2013) which considered the impact of the development proposals for the AM and PM peak hours (08:00 - 09:00 and 17:00 - 18:00). The remainder of this note therefore focuses on these time periods.

Table 2-2: Station Road Level Crossing Closures Peak Hour Survey Results

Barrier Down	Freight or Passenger	Direction	Stops at Station?	Barrier Up	Southbound Queues	Northbound Queues	Closure Time
08:25:57	Passenger	West	No	08:27:52	14	5	00:01:55
08:32:43	Passenger	East	Yes	08:36:49	24	8	00:04:06
08:43:11	Passenger	West	Yes	08:45:28	5	9	00:02:17
17:05:25	Passenger	East	No	17:06:55	12	16	00:01:30
17:33:53	Passenger	East	Yes	17:38:04	16	12	00:04:11
17:39:56	Passenger	West	Yes	Still down			
Still down	Freight	East	No	17:45:40	18	23	00:05:44

2.1.3 PJA produced an Addendum Transport Assessment (October 2013) in relation to the proposed development. This report estimated the traffic flows that will be generated by the development. From this, it can be seen how many development trips will pass through the level crossing during the peaks hours. These figures have been used to estimate the arrival rate of development vehicles at the crossing.

Table 2-3: Arrival Rate of Development Vehicles at the Level Crossing

Direction	AM		PM	
	Vehicles	Vehicle/Minute	Vehicles	Vehicle/Minute
Northbound	28	0.5	83	1.4
Southbound	94	1.6	38	0.6

2.1.4 The arrival rates in Table 2-3 have been applied to the observed level crossing barrier closure times to derive the additional queues likely to form at the level crossing as a result of the proposed development.

Table 2-4: Queues at Level Crossing - Proposed Use

Barrier Down	Closure Time	Additional Northbound Queue	Additional Southbound Queue
08:25:57	00:01:55	1	3
08:32:43	00:04:06	2	7
08:43:11	00:02:17	1	4
17:05:25	00:01:30	2	1
17:33:53	00:04:11	6	3
17:39:56	00:05:44	8	3

2.1.5 As set out in the original Transport Assessment prepared in 2008, the Station Road level crossing has an estimated capacity of 1,800 vehicles per hour (in accordance with TRL's RR67), equivalent to one vehicle every two seconds. Table 2-5 therefore summarises the additional delay likely to be incurred during each barrier operation.

Table 2-5: Delays at Level Crossing - Proposed Use

Barrier Down	Closure Time	Additional Northbound Queue	Additional Northbound Delay (s)	Additional Southbound Queue	Additional Southbound Delay (s)
08:25:57	00:01:55	1	2	3	6
08:32:43	00:04:06	2	4	7	14
08:43:11	00:02:17	1	2	4	8
17:05:25	00:01:30	2	4	1	2
17:33:53	00:04:11	6	12	3	6
17:39:56	00:05:44	8	16	3	6

2.1.6 The Addendum Transport Assessment also estimated the traffic flows that would be generated by the site's extant B2 use. From this, it can be seen how many of these development trips would pass through the level crossing during the peaks hours. These figures have been used to estimate the arrival rate of vehicles at the crossing.

Table 2-6: Arrival Rate of Vehicles at the Level Crossing

Direction	AM		PM	
	Vehicles	Vehicle/Minute	Vehicles	Vehicle/Minute
Northbound	38	0.6	9	0.2
Southbound	9	0.2	53	0.9

2.1.7 The arrival rates in Table 2-6 have been applied to the observed level crossing barrier closure times to derive the additional queues likely to form at the level crossing as a result of the site remaining in B2 use.

Table 2-7: Queues at Level Crossing - Extant Use

Barrier Down	Closure Time	Additional Northbound Queue	Additional Southbound Queue
08:25:57	00:01:55	1	0
08:32:43	00:04:06	2	1
08:43:11	00:02:17	1	0
17:05:25	00:01:30	0	1
17:33:53	00:04:11	1	4
17:39:56	00:05:44	1	5

2.1.8 Table 2-8 summarises the additional delay likely to be incurred during each barrier operation, using the methodology set out in paragraph 2.1.5.

Table 2-8: Delays at Level Crossing - Extant Use

Barrier Down	Closure Time	Additional Northbound Queue	Additional Northbound Delay (s)	Additional Southbound Queue	Additional Southbound Delay (s)
08:25:57	00:01:55	1	2	0	0
08:32:43	00:04:06	2	4	1	2
08:43:11	00:02:17	1	2	0	0
17:05:25	00:01:30	0	0	1	2
17:33:53	00:04:11	1	2	4	8
17:39:56	00:05:44	1	2	5	10

2.1.9 Table 2-9 sets out the net change in queuing and delay when considering the proposed development against the extant use.

Table 2-9: Additional delays at Level Crossing caused by proposed development rather than B2 use

Barrier Down	Closure Time	Additional Northbound Queue	Additional Northbound Delay (s)	Additional Southbound Queue	Additional Southbound Delay (s)
08:25:57	00:01:55	0	0	3	6
08:32:43	00:04:06	0	0	6	12
08:43:11	00:02:17	0	0	4	8
17:05:25	00:01:30	2	4	0	0
17:33:53	00:04:11	5	10	-1	-2
17:39:56	00:05:44	7	14	-2	-4

2.1.10 Table 2-9 demonstrates that there is no impact on the northbound carriageway during the AM peak period. On the southbound carriageway, the maximum additional delay likely to be incurred is approximately 12 seconds.

2.1.11 In the PM peak period, the maximum additional delay likely to be incurred on the northbound carriageway is approximately 14 seconds. It can be seen that the proposed residential development would result in up to a four second reduction in delay during the PM peak on the southbound carriageway.

2.1.12 It is likely that new residents of the proposed development would time their journeys to avoid these barrier operation times (as they are consistent every day). The additional queues and delays are therefore likely to be less than reported above, and the figures presented should be considered as a theoretical worst case. The net increase in queuing and delays at the level crossing are not significant, and in the context of NPPF the impact of the proposals is not considered to be severe.

3 Pedestrian Crossing

3.1.1 The previous highway proposals included a zebra crossing to the south of the site access on Station Road. SCC stated that as a Stage One Road Safety Audit had not been undertaken, this represented a potential reason for refusal.

3.1.2 Following further discussion with SCC, the rationale for providing such a crossing has been reconsidered and it is now proposed that a formal crossing facility is not required. The reasons for this are as follows:

- Low traffic flows on Station Road;
- Pedestrian link and footway upgrades to be made to the south-east of the site; and
- Limited demand for crossing Station Road at the proposed crossing location.

Low Traffic Flows on Station Road

3.1.3 Traffic surveys were conducted during the week commencing 16/06/12. It was found that over a 24 hour period, 1966 vehicles were reported travelling northbound and 1570 travelling southbound (based on a 5 day average). The maximum northbound hourly flow was recorded as 261 vehicles and the maximum southbound hourly flow was recorded as 178 vehicles. These are considered to be relatively low traffic flows which provide sufficient opportunity for pedestrians to cross Station Road.

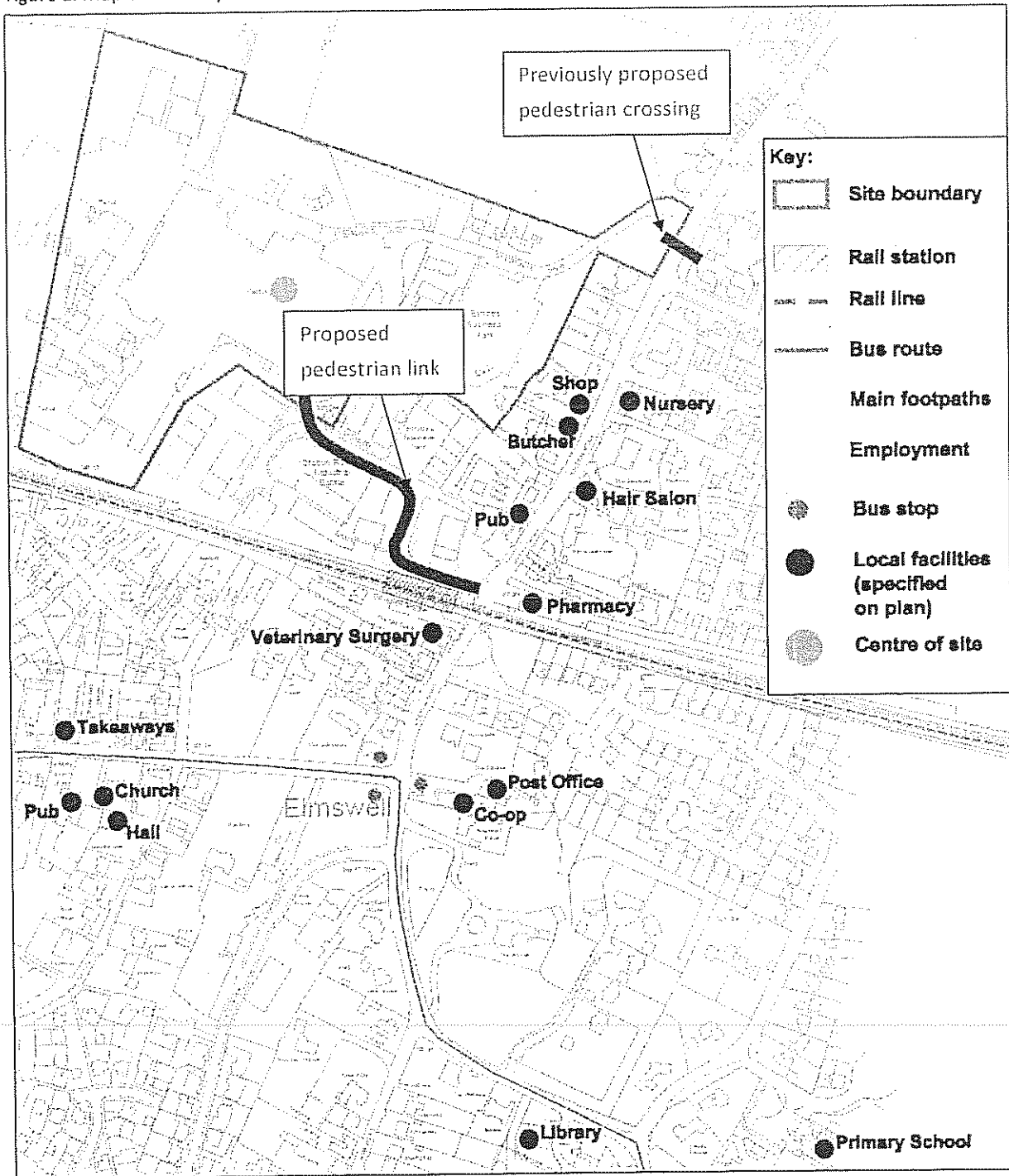
Pedestrian Link and Footway Upgrades

3.1.4 The development proposals include the provision of a pedestrian link and upgrading existing footways through Elmtree Business Park / Station Road Industrial Estate. Improvements will include:

- New surfacing from the boundary of the site to the edge of the existing carriageway;
- Two new lighting columns; and
- Dropped kerb with tactiles on each side of the carriageway in two locations.

3.1.5 These improvements would encourage pedestrians to leave the site via the south-east edge. From here, there is little reason for pedestrians to walk north along Station Road to the proposed location of the pedestrian crossing. The footways and previously proposed crossing location are illustrated in Figure 1.

Figure 1: Map of Footways and Local Amenities



Limited demand for crossing Station Road at the proposed crossing location

3.1.6 Figure 1 illustrates the locations of the local facilities and amenities. It can be seen that the majority (shop, butcher, pub, vets, takeaways, pub, church, hall) of these are located such that residents would not need to cross Station Road in order to access them by foot. Pedestrians wishing to access the Post Office, Co-op, library or primary school are able to do so safely via an existing pedestrian crossing on Station Road (adjacent to School Road) and continuous footways.

4 Summary

4.1.1 This Technical Note has re-assessed the highway impact of the level crossing on Station Road in Elmswell. A new survey was undertaken to obtain more recent and detailed data. This data also included both passenger and freight train movements. Analysis of the data has shown that the impact of the proposed development on highway delays is negligible and actually results in a reduction in delays on the southbound carriageway during the PM peak period, when compared to that generated by the site remaining in B2 use.

4.1.2 The requirement for the provision of a pedestrian crossing on Station Road has also been re-assessed. The location of the previously proposed pedestrian crossing has been shown to be unnecessary due to the locations of the local amenities in relation to the proposed development. The existing pedestrian facilities and proposed footway upgrades are considered to provide more than adequate connections to the local attractions. It is therefore proposed that a zebra crossing is not required and this has therefore been removed from the access drawing (Drawing No. 947-02.Revision J) appended to this note.

4.1.3 On the basis of this note it is therefore considered that the previous concerns raised with regard to the level crossing assessment and the location of the zebra crossing have now been addressed, thus there should be no reason for an objection on highway grounds.

PCC Job No: 2200 – Elmswell Level Crossing – 05/06/14 - 07.30-09.30 & 16.30-18.30

Road traffic incidents:

A bin lorry crew was carrying out house-to-house collections during part of the morning survey period, slowing traffic along the road that passes over the crossing. However this appeared to have little, if any, effect on the queue lengths when the barriers came down. Otherwise traffic appeared to flow normally.

Passenger train movements:

All passenger services were running within a minute or two of their scheduled times except that the barriers were down at the commencement of the afternoon session due to a late-running westbound (Ipswich to Peterborough) service. If all trains had been running according to their timetable, this barrier closure would not have been recorded.

Vehicles queuing twice:

The barriers lifted at 07:46:06 but came down again just 50 seconds later at 07:46:56. This meant that approximately half of the vehicles that had queued for the passage of the first train then had to wait again for the passage of the second, as they had not passed over the crossing when the barriers came down for the second time.

Successive trains:

The barriers closed at 17:39:56 to allow for the passage of a (stopping) westbound passenger service. After it had passed over the crossing, the barriers remained down for the passage of an eastbound freight train, lifting at 17:45:40. Hence the queue lengths shown represent an aggregate from the two services.

Stopping freight service:

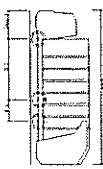
An eastbound freight train was held in the platform, by a red signal, for approximately 5 minutes prior to the barriers coming down at 18:02:35, so it was recorded as stopping at the station. However, unlike when eastbound passenger services were in the station (with a proceed aspect shown on the signal), the barriers remained up. Thus road traffic was not delayed while the train was in the station.



Notes
 Visibility Splays shown are taken from Manual for Streets

Key

- Ownership Boundary
- Highway Boundary
- Visibility Splays



Large Refuse Vehicle (LRV) (side)
 Overall Length 10.0m
 Overall Width 2.5m
 Wheelbase 4.0m
 Lock to Lock 3.0m
 Height 3.0m
 (From 1000mm kerb)

Proposed Site Access
 Former Grampian County
 Foods Site, Elmswell
 Harrow Estates

PHIL JONES ASSOCIATES
 100 High Street, Harrow, London HA1 1JH
 Tel: 0181 271 1111 Fax: 0181 271 1112
 Email: phil@philjones.co.uk
 www.philjones.co.uk

Project:
 Former Grampian County
 Foods Site, Elmswell

Proposed Site Access
 9A7-02

AMENDED PLANS CONSULTATION

PARISH COUNCIL

Comments from: Elmswell Parish Council

Planning Officer: Elizabeth Truscott
Application Number: 0846/13
Proposal: Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)
Location: Former Grampian Harris, St Edmunds Drive, Elmswell

Elmswell Parish Council objects to this application on the following grounds:

- The site has been dedicated to providing employment since the formation of the St Edmundsbury Co-operative Bacon Factory in 1912 providing, as late as the turn of the century, over 600 local jobs across a wide range of skill sets. Since the closure in 2006, there has been an unfortunate sequence of financial and related factors which have left the site in a commercial limbo and allowed the facility to atrophy as an unattractive development proposition. The market for industrial or commercial development has not been tested. The site is clearly identified in the Local Plan (Inset 29) as a 'factory', rendering its inclusion as 'an employment site' in any subsequent strategic plan unnecessary. Local Plan Policy E4 confirms that;

'the..Authority will refuse proposals for development...within existing industrial/business areas which would be likely to prejudice the continued use of those areas for primarily industrial or commercial purposes.'

Local Plan Policy E6 states that:

'The District Planning Authority recognises the importance of existing industrial and commercial sites as providing local employment opportunities. In considering applications for change of use or redevelopment of existing premises to non-employment generating activities , the District Planning Authority will expect a significant benefit for the surrounding environment, particularly in terms of improved residential amenity or traffic safety.'

Local Plan Policy E7 asserts that:

'The District Planning Authority will encourage the relocation of industrial and commercial activities that are, or have become, inappropriate to their surroundings...'

This site must, therefore, be developed within those policies and employment must be a key factor in any permission granted.

However, councillors are aware of the Applicant's wish to dedicate the site to residential development. This can only be countenanced if the provision of employment is addressed by this proposal acting as an enabling step towards employment provision elsewhere in Elmswell. The access road must, therefore, traverse the Northern boundary of the site as far as its Western edge so as to allow further development on adjacent sites to the railway and beyond so that this road can be rendered commercially feasible as a relief road over the railway line. The road should, furthermore, incorporate a spur to serve the existing Station Road industrial Estate so as to remove the need for access to and from this estate immediately adjacent to the railway level crossing. This element must form part of any Permission and cannot be left as a Reserved Matter for resolution later.

With a relief road established, the lost elements of business, commercial, industrial and employment can be found further north of this site without placing further pressure on the village's road infrastructure.

MSDC Core Strategy policy CS11 confirms the validity of these observations.

- 2 Contributions towards a relief road can legitimately come from s106 agreements. The complex nature of the site in Planning terms means that discussion can only be entered into in this regard following the submission of a properly resourced Viability Assessment. Until such an assessment is made available, this application should go no further.
- 3 The emerging Elmswell Neighbourhood Plan is identified by MSDC as a pilot following a formal request from EPC. Public consultation thus far, including public meetings, clearly identifies a relief road as the community priority, and this is inevitably to be reflected in the Neighbourhood Plan as a prime objective.
An application of this magnitude and strategic importance cannot be considered until the Neighbourhood Plan is adopted or, at least, until the relevant sections of that Plan are reliably fixed as representative of the community view so that the proposal can be tested against that view. The application is, similarly, premature in terms of the evolving MSDC Core Strategy document and should not be considered until the Strategy document is in place.
- 4 The Proposal seeks the diversion of Elmswell Footpath 12 through the housing estate. The Right of Way then traverses the railway line to emerge in Hawk End Lane. The inevitable increased use of this path and the access to the railway line afforded to an increased number of children poses an unacceptable risk. The path must be stopped at the railway and a diversion sought to allow use of the underpass at Parnell lane pending the possible installation of a relief road bridge which would then serve. Local Plan Policy RT12 refers.
- 5 The NPPF clearly puts 'sustainability' at the forefront of development criteria. The completion of the Ipswich Chord next year will see the beginning of a process of transferring freight from road to rail which anticipates 750,000 extra containers passing through Elmswell annually. More, longer trains means more and longer downtimes for the crossing gates and vastly increased delays for road traffic. There is already occasional gridlock as the backed-up queuing traffic fails to clear the crossing before the gates come down again.

The considerable increase in traffic since the closure of the Bacon Factory gives the lie to any suggestion that this proposal would simply impose like-for-like traffic flows when the factory traffic, as was, is taken into account. The situation is now far busier and far worse.

Of considerable and widespread concern is the position regarding emergency vehicles. Households north of the railway are currently at a severe and potentially fatal disadvantage as the crossing gate downtime increases. This will become dramatically worse and must be a substantive consideration when the relief road proposal is considered. This proposal is not currently sustainable. Regardless of the relief road proposal, a footbridge should be provided over the railway as per Planning permission previously granted. Similarly, support should come from this Application towards the community pedestrian / cycle path to Woolpit for which land has already been acquired. Failure to address these issues would clearly breach the strictures of Structure Plan Policies T2, T4, T10 & T11.

- 6 Representations from Anglian Water regarding problems in dealing with sewage disposal from this proposal and from HC Wilson on behalf of HGV operators with regard to the hazards created by the proposed junction with Ashfield Road are supported by Elmswell Parish Council. With regard to the junction, consideration must be given to the eventual need for a change of priorities at this junction as the relief road becomes the more important traffic route.

Support

Object

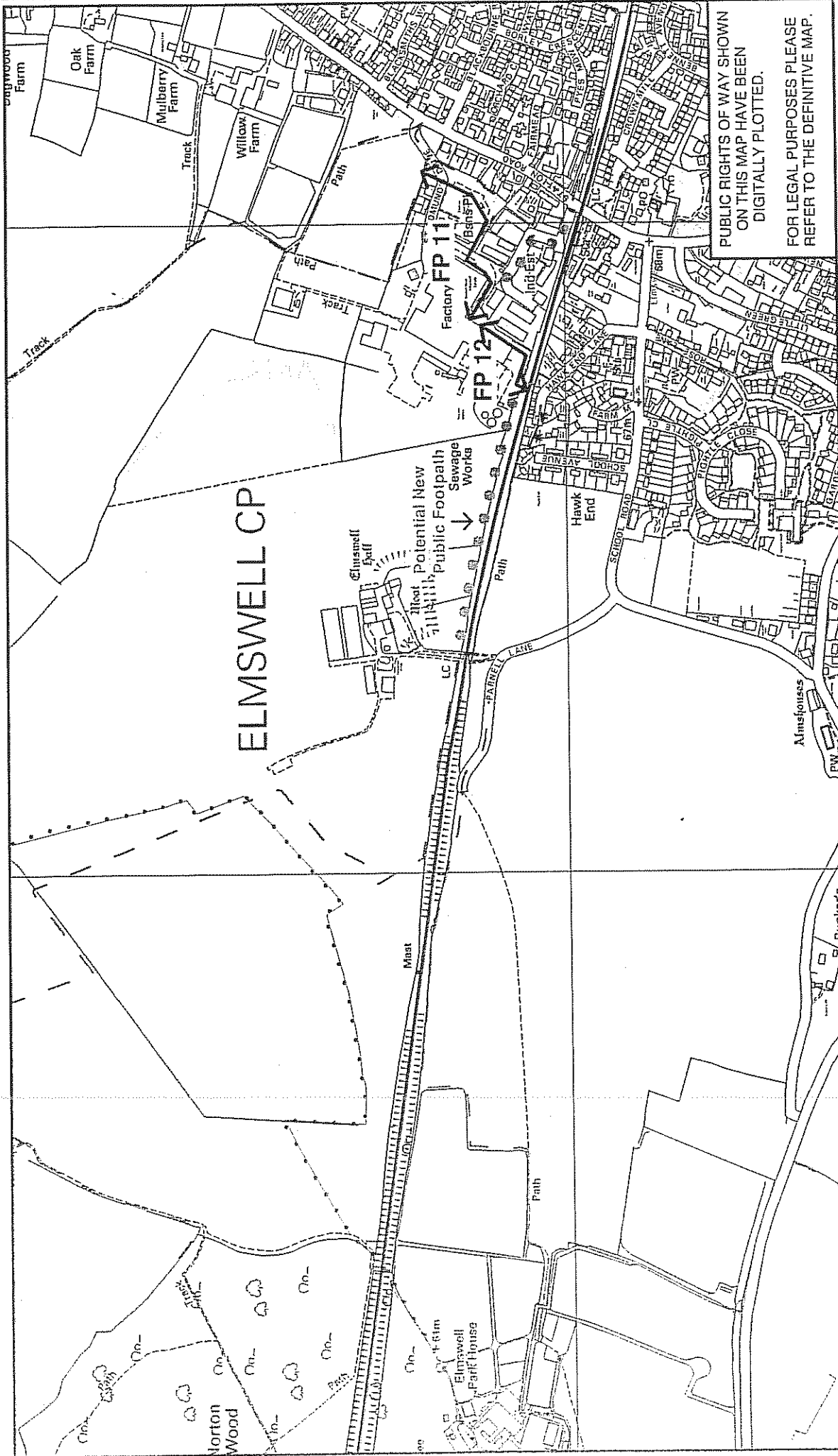


No Comment

Signed.....Peter Dow..... on behalf of Elmswell Parish Council

Dated

19th November 2013



PUBLIC RIGHTS OF WAY SHOWN ON THIS MAP HAVE BEEN DIGITALLY PLOTTED.
FOR LEGAL PURPOSES PLEASE REFER TO THE DEFINITIVE MAP.

Former Grampian Harris Factory, Elmswell
Alternative Safe Rail Crossing

- Public Footpath
- Bridleway
- Restricted Byway
- Byway
- Parish Boundary

Scale 1:8000
Ordnance Survey MasterMap
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Suffolk County Council
Licence No. 100023395 2013

Suffolk County Council
Lucy Robinson,
Director of Economy, Skills and Environment,
Endavour House, 6 Russell Road, Ipswich, Suffolk, IP1 2BX

A Quality Council

ELMSWELL PARISH COUNCIL

Clerk to the Council, Peter Dow

PARISH CLERK'S OFFICE, STATION ROAD, ELMSWELL,

BURY ST. EDMUNDS, SUFFOLK IP30 9HR

Telephone (01359) 244 134

email; clerk @elmswell.suffolk.gov.uk

www.elmswell.suffolk.gov.uk

Mr Philip Isbell
 Planning Development Manager
 Planning Services
 Mid Suffolk District Council
 131 High Street
 NEEDHAM MARKET
 IP6 8DL

MID SUFFOLK DISTRICT COUNCIL	
PLANNING CONTROL	
RECEIVED	
29 MAY 2013	
ACKNOWLEDGED	
DATE	
ISSUE TO	PK

24th May 2013

Dear Mr Isbell

Planning application 0846/13 at Former Grampian Harris bacon factory site, Elmswell

Further to your invitation dated 17th April to comment on the above application, I enclose the formal response of Elmswell Parish Council, as formulated at a meeting on 22.05.13.

Councillors have come to their conclusions following wide community consultation and with the very helpful and professional guidance of your colleague Peter Goodyear, to whom we extend our thanks.

Against a background of Government Circulars 05/05 and 11/95, Councillors feel that their objections are valid and that no further progress should be made with this application unless and until they are addressed.

In the wider context of community discussions which have informed these representations, the point has often been made that the weight restriction on A1088 channels considerable HGV traffic through Elmswell and past this site. Although tangential to this application, I have been asked to suggest that you and colleagues bear this in mind as a material consideration. It is suggested and widely supported, not least by both of our Ward Members, that this restriction should be lifted as part of the consideration given to representations and objections made in response to this application by HGV operators who must use Ashfield road daily.

Meanwhile, I have been asked to seek candidates for a formal advisory role to EPC by way of a professional individual with appropriate skills and experience to take forward the concept of a relief road, which concept runs throughout the formal representations. I anticipate the appointment of Councillors' choice of such an agent at a meeting on 17th June and would imagine that he or she will soon be in touch with your department on EPC's behalf. Councillors would

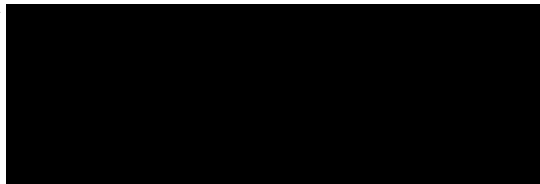
hope that you agree that, by bringing the various interested parties together there is a possibility of realising the relief road as the key to allowing expansion of our community to the general benefit.

As part of this process, the element of New Homes Bonus contribution will be an important factor. It would seem obvious that the proposal for financial input from the scheme towards a relief road is entirely in sympathy with the aims and objectives of the New Homes Bonus scheme. Councillors would appreciate your feedback on the practicalities of realising money from this initiative and our agent, when appointed, will no doubt be pursuing this with you and colleagues.

Would you, please, arrange for this covering letter to appear with and form part of my Council's formal response?

We look forward to continued cooperation and thank you again for your help thus far.

Yours sincerely



Peter Dow
Clerk to the Council

PARISH COUNCIL

Comments from: Elmswell Parish Clerk

Planning Officer: Peter Goodyear
Application Number: 0846 / 13
Proposal: Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)
Location: Former Grampian Harris, St Edmunds Drive, Elmswell

Elmswell Parish Council objects to this application on the following grounds:

- 1 The site has been dedicated to providing employment since the formation of the St Edmundsbury Co-operative Bacon Factory in 1912 providing, as late as the turn of the century, over 600 local jobs across a wide range of skill sets. Since the closure in 2006, there has been an unfortunate sequence of financial and related factors which have left the site in a commercial limbo and allowed the facility to atrophy as an unattractive development proposition. The market for industrial or commercial development has not been tested. The site is clearly identified in the Local Plan (Inset 29) as a, 'factory', rendering its inclusion as 'an employment site' in any subsequent strategic plan unnecessary.

Local Plan Policy E4 confirms that;

'the..Authority will refuse proposals for development...within existing industrial/business areas which would be likely to prejudice the continued use of those areas for primarily industrial or commercial purposes.'

Local Plan Policy E6 states that:

'The District Planning Authority recognises the importance of existing industrial and commercial sites as providing local employment opportunities. In considering applications for change of use or redevelopment of existing premises to non-employment generating activities, the District Planning Authority will expect a significant benefit for the surrounding environment, particularly in terms of improved residential amenity or traffic safety.'

Local Plan Policy E7 asserts that:

'The District Planning Authority will encourage the relocation of industrial and commercial activities that are, or have become, inappropriate to their surroundings...'

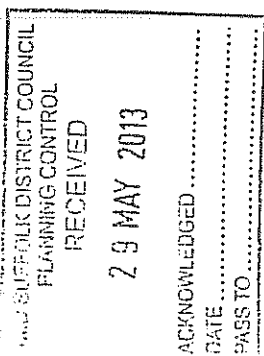
This site must, therefore, be developed within those policies and employment must be a key factor in any permission granted.

However, councillors are aware of the Applicant's wish to dedicate the site to residential development. This can only be countenanced if the provision of employment is addressed by this proposal acting as an enabling step towards employment provision elsewhere in Elmswell.

The access road must, therefore, traverse the Northern boundary of the site as far as its Western edge so as to allow further development on adjacent sites to the railway and beyond so that this road can be rendered commercially feasible as a relief road over the railway line. The road should, furthermore, incorporate a spur to serve the existing Station Road industrial Estate so as to remove the need for access to and from this estate immediately adjacent to the railway level crossing. This element must form part of any Permission and cannot be left as a Reserved Matter for resolution later.

With a relief road established, the lost elements of business, commercial, industrial and employment can be found further north of this site without placing further pressure on the village's road infrastructure.

MSDC Core Strategy policy CS11 confirms the validity of these observations.



- 2 Contributions towards a relief road can legitimately come from s106 agreements. The complex nature of the site in Planning terms means that discussion can only be entered into in this regard following the submission of a properly resourced Viability Assessment. Until such an assessment is made available, this application should go no further.
- 3 The emerging Elmswell Neighbourhood Plan is identified by MSDC as a pilot following a formal request from EPC. Public consultation thus far, including public meetings, clearly identifies a relief road as the community priority, and this is inevitably to be reflected in the Neighbourhood Plan as a prime objective. An application of this magnitude and strategic importance cannot be considered until the Neighbourhood Plan is adopted or, at least, until the relevant sections of that Plan are reliably fixed as representative of the community view so that the proposal can be tested against that view. The application is, similarly, premature in terms of the evolving MSDC Core Strategy document and should not be considered until the Strategy document is in place.
- 4 The Proposal seeks the diversion of Elmswell Footpath 12 through the housing estate. The Right of Way then traverses the railway line to emerge in Hawk End Lane. The inevitable increased use of this path and the access to the railway line afforded to an increased number of children poses an unacceptable risk. The path must be stopped at the railway and a diversion sought to allow use of the underpass at Parnell lane pending the possible installation of a relief road bridge which would then serve. Local Plan Policy RT12 refers.
- 5 The NPPF clearly puts 'sustainability' at the forefront of development criteria. The completion of the Ipswich Chord next year will see the beginning of a process of transferring freight from road to rail which anticipates 750,000 extra containers passing through Elmswell annually. More, longer trains means more and longer downtimes for the crossing gates and vastly increased delays for road traffic. There is already occasional gridlock as the backed-up queuing traffic fails to clear the crossing before the gates come down again. The considerable increase in traffic since the closure of the Bacon Factory gives the lie to any suggestion that this proposal would simply impose like-for-like traffic flows when the factory traffic, as was, is taken into account. The situation is now far busier and far worse.
Of considerable and widespread concern is the position regarding emergency vehicles. Households north of the railway are currently at a severe and potentially fatal disadvantage as the crossing gate downtime increases. This will become dramatically worse and must be a substantive consideration when the relief road proposal is considered.
This proposal is not currently sustainable. Regardless of the relief road proposal, a footbridge should be provided over the railway as per Planning permission previously granted. Similarly, support should come from this Application towards the community pedestrian / cycle path to Woolpit for which land has already been acquired. Failure to address these issues would clearly breach the strictures of Structure Plan Policies T2, T4, T10 & T11.

Application Number: 0846/13

Proposal: Outline planning application for demolition of all buildings on site (comprising redundant factory in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)

Location: Former Grampian Harris, St Edmunds Drive, Elmswell

Great Ashfield parish council discussed the application and unanimously objects on the following grounds:

1. Major concern is expressed at the amount of traffic accessing Station Road and its impact on an already busy and on many occasions congested road particularly when the train crossing barriers are down. With both the impact of extra traffic and the completion of the Ipswich Chord next year with possibly 750,000 extra containers passing through Elmswell. This will increase both longer downtime of the train barriers and vastly increased delays to traffic with the accompanying gridlock.
2. Due to possible increased gridlock within Elmswell this will have a substantial impact on Great Ashfield with both HGV's and unnecessary extra traffic using Great Ashfield's roads as an alternative route.
3. Concern is also expressed at the longer delays of emergency vehicles coming through Elmswell with longer downtimes for the train barriers as well as much increased traffic.
4. Concern at the stretching of local resources i.e. primary school, doctors and dentists.
5. This application should not be approved until there is a relief road.

Date: 3rd December 2013
Enquiries to: Chris Ward
Tel: 01473 264970
Email: chris.ward@suffolk.gov.uk

Peter Black
Development Control
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Dear Peter

Suffolk County Council response to the Former Grampian Country Foods Site

Thank you for providing me the interim residential travel plan for the former Grampian Country Foods Site in Elmswell. I have had a chance to review the travel plan and have noticed that there is quite a lot of information and structure missing in the document.

One of the main issues with the travel plan is the lack of strategy, considering the development proposal is for 190 dwellings and close to the level crossing, which is a known traffic black spot during peak periods. The site's Travel Plan Coordinator must be committed to delivering the travel plan's objectives as soon as the first dwelling is occupied, and for an additional five years after the occupation of the final dwelling. There must be measures to encourage residents to utilise the sustainable options that are available to them such as the railway station for example, such as providing taster tickets to use the train. One of the roles of the Travel Plan Coordinator would be to sell the benefits of using the train more frequently, and explain some of the benefits of using the train, such as saving the resident time and money from their commute to work.

No commitment to the timescales of the travel plan has been provided. It is normal practice for a travel plan to be implemented from first occupation, and then monitored from a trigger point (50% of occupation). This monitoring must continue for an additional five years after the final dwelling has been occupied. This detail should be provided within the travel plan.

I have listed some further comments regarding the content of the travel plan. As soon as I receive clarification on the comments I will be in a better position to consider approving the travel plan

If you require any clarification on the comments attached to this letter, please contact me to discuss.

I look forward to receiving the updated travel plan.

Yours sincerely

Chris Ward
Travel Planner
Economy, Skills and Environment

3 Existing Transport Opportunities:

Include a list of site specific barriers and issues towards using sustainable transport (e.g. times and frequency of public transport, perceived danger of cycling, etc)

Paragraph 3.2.1: Include details from the "Method of Travel to Work" from the 2011 Census data for the Elmswell and Norton Ward. The data from **Table 7-1** should be used in this section.

Paragraph 3.2.2: Are the existing bus stops on Station Road; covered, have timetables and are DDA compliant?

Table 3-1: Include the times of the first and last buses for each service.

To nearest route to the 384/385 bus services for the residents living in the west side of the development would need to cross the railway line and down a road without footways to access the nearest bus stop. This may cause an issue for these residents.

Include the Mulleys BINGO service in the table as it also uses the stop on Station Road.

Paragraph 3.2.3: Include the details of the first and last trains to Ipswich and Cambridge that serve Elmswell railway station.

Paragraph 3.3.1: Is there a safe walking and cycling route to the primary school?

4.1 Proposed Development:

Will there be any pedestrian footways on the site as the **Site Map** does not show any?

Will there be sufficient cycling storage for each dwelling?

Include the estimated date of completion of the development. If that is not available include the estimated time the whole site will take to construct from commencement.

Will the development be phased?

Paragraph 4.1.5: What type of crossing will be provided for pedestrians to cross the railway line? Will cyclists also be able to use the crossing?

Table 4-1: It is unclear how the multi-modal trip generation provided within Table 4-1 has been calculated. Evidence of how the multi-modal trip generation has been calculated should be provided.

Paragraph 5.2.1: The Travel Plan Coordinator must be appointed no later than six months prior to occupation of the first dwelling.

The Travel Plan Coordinator must remain in post for a minimum of five years after the final dwelling is occupied to continue promoting and monitoring the Travel Plan.

How many hours will the Travel Plan Coordinator work? What is the cost of employing them? Who will they report to?

The contact details of the Travel Plan Coordinator and the Developer must be provided to Suffolk County Council at the earliest possible opportunity and included in the full travel plan.

Paragraph 5.3.1: How often will the Travel Plan Steering Group meetings take place?

Paragraph 6.2.1: Will the following be included in the Welcome Pack:

- Bike vouchers or discounts
- Bus and train taster tickets
- Discounts on public transport
- Information on the site's Bicycle User Group (BUG)

Paragraph 6.4.1: Will the Travel Plan Coordinator negotiate discounts for residents with local public transport operators?

There is no information on the frequency for when the Travel Plan Steering Group (TPSG) will meet. It is suggested that the TPSG should meet at least twice per year for the duration of the travel plan.

Paragraph 6.5.1: Will the Travel Plan Coordinator negotiate discounts with local cycle retailers?

Will a Bicycle User Group (BUG) be set up to encourage more residents to cycle?

Include Walk to Work and National Bike Weeks as a measure to encourage residents to walk and cycle more.

Paragraph 6.7.1: Include National Liftshare Week as a measure to encourage residents to car share.

Paragraph 7.1.2: Provides an objective to reduce single occupancy vehicles by 11%. However, this is not a target and is not SMART (Specific, Measurable, Attainable, Relevant and Timebound). To accord with best practice guidance a SMART target should be provided. It is suggested that the travel plans objectives and targets should look to reduce single occupancy vehicle travel from when the first dwelling is occupied, and for an additional five years after the final (190th) dwelling is occupied.

Interim travel plan targets need to be made which mainly focus on reducing single occupancy vehicle travel to and from the site.

Paragraph 7.1.3: The targets must be reviewed and included in an updated travel plan as soon as the baseline surveys have been completed.

Paragraph 7.3.1: The annual travel surveys should be carried out at 50% trigger point of the total occupation (occupation of the 95th dwelling). If the development will be phased the trigger point may be changed. The surveys then must be undertaken annually by the site Travel Plan Coordinator until the five years after the final (190th) dwelling is occupied.

Will there be any other forms of monitoring, such as monitoring the uptake of discounts and taster tickets?

Will the surveys be electric or paper based? Will there be an incentive to complete the survey (e.g. entering a prize draw)

The completed annual monitoring reports must be submitted to Suffolk County Council at the earliest possible opportunity. The monitoring must commence as soon as the 95th dwelling is occupied, and finish no earlier than five years after the final dwelling has been occupied.

Paragraph 8.1.1: A commitment to providing a final travel plan to SCC for approval prior to occupation of the development is required. This should be secured by condition.

Appendices:

The following must be included in the travel plan:

Finance Plan – Include a budget for the costs of implementing the travel plan. The costs should include the cost of employing the Travel Plan Coordinator, the cost of the measures and the cost of monitoring the travel plan. This should be based on occupation of the first dwelling to the five years after occupation of the final dwelling.

Action Plan – This details the timescales and responsibilities for when each travel plan measure and action is implemented.

Bus and Rail Timetables

Walking, Cycling and Public Transport Maps

Example of the Travel Plan Survey



Safe roads, reliable journeys, informed travellers

Our ref: 0846/13
Your ref:

Lorraine O'Gorman

Peter Goodyear
Senior Planning Officer
Mid Suffolk District Council
Council Offices
131 High St
Needham Markets
Ipswich
IP6 8DL

Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: 01234 796162
Fax: 01234 796340

12 November 2013

Dear Peter,

OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT OF UP TO 190 DWELLINGS INCLUDING ACCESS ON FORMER GRAMPIAN COUNTRY FOODS SITE, ST EDMUNDS DRIVE, ELMSWELL

Following a discussion with Mike Edwards of Phil Jones Associates I am writing to ascertain the current programme/timetable for the above application. As you will be aware the Highways Agency was not included as Statutory Consultees despite providing pre-application advice.

In addition the Aecom technical report prepared on behalf of Suffolk County Council dated 20th May 2013 also made the following recommendation:

Strategic Road Network

2.71 The assessment of the impacts of the development on the Strategic Road Network has not been audited and it is recommended that the HA are consulted as part of the statutory consultation process.

It is imperative the Highways Agency provide technical comments on the Transport Assessment to understand the impact of the development on the strategic road network. As such we would like a response by Friday 22nd November 2013 to ascertain how best to take this forward without causing any undue delay.

Yours sincerely



Lorraine O'Gorman
Network Delivery & Development
Email: Lorraine.O'Gorman@highways.gsi.gov.uk

cc Mike Edwards, Phil Jones Associates





Safe roads, reliable journeys, informed travellers

Our ref: L989641
Your ref: 0846/13

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

Joseph Kennedy
Network Delivery & Development - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: 01234 796328

11 December 2013

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
ORDER 2010**

PLANNING APPLICATION: 0846/13

PROPOSAL: Demolition of all buildings on site and erection of up to 190 dwellings.

LOCATION: Former Grampian Foods, St Edmunds Drive, Elmswell, Suffolk

Thank you for your correspondence dated 22nd November 2013, notifying the Highways Agency of the above application.

The Highways Agency has instructed a technical review of the Transport Assessment accompanying the application. As this may take some time I have issued a Holding Direction which will be removed as soon as we have reviewed the information and discussed it with you.

Please find attached a Direction under Article 25 of the Town and Country Planning (Development Management Procedure) Order 2010 which shall be maintained until such time as the Secretary of State has assessed the traffic implications for the strategic trunk road network. The Direction shall be maintained until 17th January 2014.

Should you wish to discuss the matter further, please do not hesitate to contact me.

Joseph Kennedy
NDD EAST
Team Administrator
Email: PlanningEE@highways.gsi.gov.uk



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

08/05/2013

Dear Peter,

RE: 0846/13 Outline planning application for demolition of all buildings on site and erection of up to 190 residential dwellings and pumping station. Construction of a new access. Former Grampian Harris, St Edmunds Drive, Elmswell

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

We have read the ecological survey report (Naturally Wild, Dec 2012) and we note the findings of the consultant. A number of protected and Biodiversity Action Plan (BAP) species were recorded on the site during 2011 and 2012. It is understood that this application is for outline planning consent with details to be subject to future reserved matters application. Whilst the supplied ecological survey report adequately assesses the biodiversity value of the site and identifies the potential impacts that may result from the development, no specific mitigation or compensation measures have been identified. We therefore recommend that in advance of any reserved matters application, or any other works on site (including any demolition), a mitigation strategy for the impacts identified is produced. Such a strategy should also include ecological enhancements for the site. It should also be noted that, should there be a significant delay before the determination of any reserved matters application, updates of the ecological surveys so far undertaken may be required.

If you require any further information please do not hesitate to contact us.

Yours sincerely

James Meyer
 Conservation Planner

Suffolk Wildlife Trust,
 Brooke House, Ashbocking,
 Ipswich, IP6 2JY
 Tel: 01473 890089

www.suffolkwildlifetrust.org

info@suffolkwildlifetrust.org

Suffolk Wildlife Trust is a
 registered charity
 no. 262777



Ministry of Defence

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

Your Reference: **0846/13**
Our reference: DIO/SUT/43/2/89 (2013/351)

Dear Peter Goodyear

MOD Safeguarding – Wattisham Station

Proposal: Outline planning applicataion for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Co

Location: Former Grampian Harris, St Edmunds Drive, Elmswell

Grid Ref: 598854, 264186

Planning Ref: 0846/13

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 17/04/2013. I can confirm that the MOD has no safeguarding objections to this proposal.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely


Claire Duddy

Defence Infrastructure Organisation

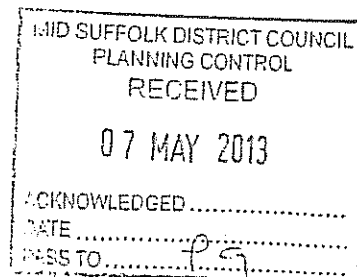
Safeguarding Department
Statutory & Offshore

Defence Infrastructure Organisation
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Tel: +44 (0)121 311 3714 Tel (MOD): 94421 3714
Fax: +44 (0)121 311 2218
E-mail: DIO-safeguarding-statutory@mod.uk

www.mod.uk/DIO

30 April 2013



NOT PROTECTIVELY MARKED

Your ref: 0846/13
Our ref: Elmswell – former Grampian Harris
site
Date: 19 June 2013
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk



Mr Peter Goodyear,
Senior Planning Officer,
Mid Suffolk District Council,
Council Offices,
131 High Street,
Needham Market,
Suffolk, IP6 8DL.

Dear Peter

Elmswell: former Grampian Harris site – 0846/13 – developer contributions

I refer to planning application reference 0846/13 to which I responded by way of letter dated 22 May 2013.

Since my letter dated 22 May 2013 was sent the catchment secondary school position has changed. At the end of May the Secretary of State made an announcement that an 11 - 16 Free School bid had been approved on the Ixworth Middle School site. Under School Organisation Review (SOR) the Middle School will close in July 2014. However, following the Secretary of State's announcement a new Free School will open in September 2014 on the Middle School site. The new school will be run by the Seckford Foundation. This Free School falls within the catchment area of Thurston Community College and has a building capacity for 540 pupils. In view of this changes at the local level we will therefore no longer be seeking secondary school contributions i.e. we can assume that surplus places will be available for the 41 pupils ages 11 -18 arising. This reduces the education contribution sought from £1,348,107 (2013/14 costs) to £584,688 (2013/14 costs).

We will still require funding for the 48 primary age pupils arising at a cost of £584,688 (2013/14 costs).

The above information is time-limited until 31 August 2014 after which time we reserve the right to reassess if the planning application is not determined by then.

I hope this is seen as very good news from a viability perspective.

Can you please update me with the anticipated timetable for taking this application to committee and also let me know what progress is being made with the viability work and S106 package in order to deliver sustainable development. I would like to be involved with any discussions regarding viability if they impact on county council infrastructure requests.


Developments Affecting Trunk Roads and Special Roads
Highways Agency Response to an Application for Planning Permission

From: Divisional Director, Network Delivery and Development, Eastern Region, Highways Agency.

To: Mid Suffolk District Council


Council's Reference: 0846/13

Referring to the notification of a planning application dated 21 November, your reference 0846/13, in connection with the A14, Demolition of all buildings on site and erection of up to 190 dwellings. Former Grampian County Foods, St Edmunds Drive, Elmswell, Suffolk. Notice is hereby given under the Town and Country Planning (Development Management Procedure) (England) Order 2010 that the Secretary of State for Transport:-

- a) offers no objection;
- ~~b) advises that planning permission should either be refused, or granted only subject to conditions~~
- ~~c) directs conditions to be attached to any planning permission which may be granted;~~
- ~~d) directs that planning permission is not granted for an indefinite period of time;~~
- ~~e) directs that planning permission not be granted for a specified period (see Annex A);~~

(delete as appropriate)

Signed by authority of the Secretary of State for Transport

Date: December 2013	Signature: 
Name: <i>HOLLAINÉ O'ADEMAN</i>	Position: <i>ASSET MANAGER SUFFOLK</i>
The Highways Agency: 2 nd Floor, Woodlands, Manton Lane, Bedford, MK41 7LW	

**Developments Affecting Trunk Roads and Special Roads
 Highways Agency Response to an Application for Planning Permission**

From: Divisional Director, Network Delivery and Development, Eastern Region, Highways Agency.

To: Mid Suffolk District Council

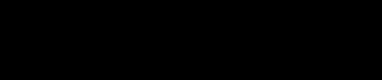
Council's Reference: 0846/13

Referring to the notification of a planning application dated 22 November, your reference 0846/13, in connection with the A14, Demolition of all buildings on site and erection of up to 190 dwellings. Former Grampian Foods, St Edmunds Drive, Elmswell, Suffolk. Notice is hereby given under the Town and Country Planning (Development Management Procedure) (England) Order 2010 that the Secretary of State for Transport:-

- a) ~~offers no objection;~~
- b) ~~advises that planning permission should either be refused, or granted only subject to conditions~~
- c) ~~directs conditions to be attached to any planning permission which may be granted;~~
- d) ~~directs that planning permission is not granted for an indefinite period of time;~~
- e) ~~directs that planning permission not be granted for a specified period (see Annex A).~~

(delete as appropriate)

Signed by authority of the Secretary of State for Transport

Date: 11 December 2013	Signature: 
Name: ALAN KIRKDALE	Position: Asset Development Manager
The Highways Agency: 2 nd Floor, Woodlands, Manton Lane, Bedford, MK41 7LW	

87



Safe roads, reliable journeys, informed travellers

Our ref: L989641
Your ref: 0846/13

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

Lorraine O'Gorman
Network Delivery & Development - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: 01234 796170

December 2013

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
ORDER 2010**

PLANNING APPLICATION: 0846/13

**PROPOSAL: Demolition of all buildings on site and erection of up to 190
dwellings**

**LOCATION: Former Grampian County Foods, St Edmunds Drive, Elmswell,
Suffolk**

Following our previous correspondence on the above application issuing a Holding Direction till the 17th January 2014, I can confirm the Highways Agency has carried out a technical review of the Transport Assessment and associated Travel Plan. The review concluded the following:

- The Highways agree that Arcady or Picady analysis of the junctions between the A14 slip roads and the local roads at Junction 47 was not required due to the small net increase in traffic using junction 47 of the A14.
- With respect of the priority junction on the south side of the Trunk Road, the junction appears to reach design capacity in the year 2023 however it is likely that an opening year assessment would show the junction remaining within capacity.
- The merge and diverge tapers at A14 J 47 will remain within their design capacity through to 2023.

As such we are issuing a TR110 offering No Objection to this application. This supersedes the previous Holding Direction.

Should you wish to discuss the matter further, please do not hesitate to contact me.

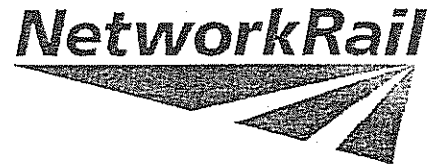
Yours faithfully



88



Lorraine O'Gorman
NDD EAST
Asset Manager
Email: PlanningEE@highways.gsi.gov.uk



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Network Rail
 Town Planning SE
 1 Eversholt Street
 London
 NW1 2DN
 Tel: 020 7904 7403

5th June 2013

RE: Application 0846/13

Dear Sir/Madam

Thank you for consulting Network Rail with regard to planning application 0846/13.

The extensive outline application proposes significant development that will alter the geographic and demographic of the village of Elmswell. Consequently the applicant has proposed a significant amount of infrastructure in the shape of new roads feeding from and utilising the existing road network. While the investment will help in accommodating the development the application does not propose investing in existing infrastructure in Elmswell. Network Rail, as owners and operators of track, signals, bridges, tunnels and level crossings has interest in Elmswekk formed of Elmswell railway station and 2 level crossings. After assessing the application Network Rail has concluded that there will be a material impact upon the following infrastructure and has the following comments to raise.

Hawk End Lane public footpath level crossing

The crossing can be accessed either from Hawk End Lane or from the north within the Former Grampian Harris, St Edmunds Drive. Pages 40-42 highlight the right of way through the development, illustrating the level crossing as an exit and entry point. Network Rail is concerned that the proposal will encourage increased use of the level of the crossing. As owner of the crossing, Network Rail has a responsibility to monitor, maintain and ensure that the crossing is safe for users to cross the railway, at present the crossing has a pair of styles and users are to ensure the crossing is clear before proceeding.

The application proposes 190 homes situated upon the north side of the railway, given that amenity in the shape of a primary school, post office, library and police station are located to the south of the railway there will be draw for residents to cross

the railway to reach these locations. In order to mitigate the impact of the increase in level crossing users the developer should provide at their expense infrastructure in the shape of either.

- infrastructure that removes the level crossing and is acceptable to Network Rail and the local authority can be provided by the developer.
- The footpath is diverted to the under pass to the west of the crossing with the level crossing subsequently closing

Planning Policy Assessment

The Mid Suffolk Core strategy adopted in 2008 is the most recent planning policy document upon which planning applications are determined therefore policies from this document should be referred when assessing the application.

Policy CS6

The policy states that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development.

NPPF

Paragraph 176 states development should not be approved if the measures required cannot be secured through appropriate conditions or agreements.

In conclusion, when presented with the proposal and the measures the applicant has proposed there is a lack of evidence that the existing level crossing infrastructure could support a development of this scale. Therefore on account of the above Network Rail objects to the planning application until the applicant provides at their own expense a mitigation measure acceptable to Network Rail and the local authority.

Kind regards,

Network Rail Town Planning South East

Your Ref: 0846/13
Date: 5th September 2013
Enquiries to: Robert Feakes
Tel: 01473 260454
Email: robert.feakes@suffolk.gov.uk

Ms Elizabeth Truscott
Mid Suffolk District Council
131 High Street
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Suffolk
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Dear Ms Truscott,

Former Grampian Harris, St Edmunds Drive, Elmswell

Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)

Further to my letter dated 1st May 2013, please consider this letter to be Suffolk County Council's formal response to consultation on the above proposal.

Suffolk County Council is not content with the transport arrangements of the proposal as set out, but is willing to work with the developer to resolve these issues. These concerns are covered in further detail below and in an attached review of the Transport Assessment accompanying proposal, but they can be summarised as:

- an inadequate transport assessment methodology,
- an unacceptable non-motorised access strategy and
- inadequate junction design.

The County Council recognises local ambitions for provision of a relief road for Elmswell, in order to relieve congestion associated with the railway crossing. Due to the inadequacies of the transport assessment, it is not possible to determine whether or not it is appropriate to require this development to fund a relief road.

In relation to this matter, and school provision, it is becoming increasingly apparent that greater clarity is needed around the distribution of growth in Suffolk Districts. The County Council is therefore keen to support Mid Suffolk District Council in moving quickly toward site allocations, in order that cumulative impacts of growth can be better understood.

Finally, the County Council notes the loss of employment land that this proposal would create, a matter which could be seen as causing conflict with Policy E4 of the 1998 Local Plan. Mid Suffolk District Council should carefully consider whether it is appropriate for this employment land to be lost in its entirety.

Highways and Transport

The County Council has extensive comments on the transport implications of this proposal, which are described in some detail in a report by consultants Aecom, appended to this letter. They are summarised as follows, and should be viewed as a demonstration that the proposal as it stands is not consistent with Core Strategy Policy CS6, and could cause harm to Core Strategy objective SO 13. The proposal also fares badly when considered against Local Plan policies T10 and T11

A key material consideration in determining this application is the assessment of impacts on the level crossing. As set out in the Aecom Report, the assessment of this key issue is insufficient.

If the concerns set out in the Aecom Report and summarised in this letter can be resolved, and dependent on the information in a revised and robust Transport Assessment, the County Council would be willing to reconsider its view.

Comment on the Transport Assessment Methodology

The transport assessment is considered inadequate as drafted, and this forms the grounds for an objection.

It does not make appropriate reference to national policy, specifically the National Planning Policy Framework, 'Level Crossing: a guide for managers, designers and operators' (Office of Rail Regulation) and 'Our Approach to Managing Level Crossing Safety' (Network Rail).

Consideration of accessibility routes is not sufficient, being based upon distances as the crow flies, rather than actual walking and cycling routes.

The Transport Assessment is not accompanied by a road safety audit, which is considered necessary in relation to concerns over the site access proposals. It also fails to include sufficient detail in relation to parking proposals. The approach to trip generation is not robust, given that it does not consider multiple modes of transport. As such, the Transport Assessment is not consistent with Department for Transport guidelines

A full analysis of the Transport Assessment can be found in the Aecom Report that accompanies this letter.

Comment on the non-motorised access strategy

The proposal encourages increased pedestrian access across the railway line at an uncontrolled crossing point, which is considered unacceptable. The route to the village centre, via Hawks End Lane, is not considered suitable for pedestrian access to this site.

Considering the Aecom report, and local interest in pedestrian crossing of the railway line, the County Council does support the principle of providing a pedestrian bridge across the railway line, though this would need to be balanced against viability and other transport considerations, and alternatives may prove acceptable. This is discussed in greater detail under the 'Public Rights of Way' heading.

Comment on road layout and junction design

Whilst the County Council is supportive of a junction design and road layout that doesn't preclude the future delivery of a relief road, the County Council requires a revision to the proposals as they stand. Revisions would be required in order to manage both the potential for a relief road and to ensure that development site traffic receives priority.

In addition, the visibility splays from the main access need to be reconsidered.

The Suffolk Design Guide states 'From the point of view of safety and the need to consider access in emergencies, not more than 150 dwellings will normally be served by a single means of access'. Given the number of dwellings to be accessed from (at present) a single point a secondary or emergency access would be recommended. Whilst this does not mean the development should be considered unacceptable, it is highly undesirable. Ways of mitigating this risk should be sought. For example, frontages should be designed so as to allow emergency service vehicles to bypass road blockages. Also, in the specific instances of this development, the Suffolk Fire and Rescue Service strongly recommends the provision of automated sprinkler systems as a measure for reducing risk. No further development will be supported with only the provision of a single access.

Comment on the travel plan

The proposed Travel Plan is considered inadequate in a number of ways. It should include a targets for reduction in car use and increases in sustainable transport modes, using robust baseline information. The County Council's Travel Plans officer would be pleased to discuss a number of detailed issues regarding the Travel Plan. He can be contacted by phone on 01473 264970 or by email via chris.ward@suffolk.gov.uk.

Public Rights of Way

The County Council notes the proposal to realign the existing footpaths through the site. Whilst maintaining the current alignment, along the edge of the site, is not acceptable, the County Council is not in favour of realigning the route along pavements through the site. This does not present an attractive walking route and represents a net loss of public footpaths. The site layout could be changed such that the existing public footpath would be realigned to travel through an attractive 'green corridor'. Officers from the Rights of Way service would be pleased to discuss options for this as the detailed site layout is developed; please contact david.falk@suffolk.gov.uk.

Regarding access across the railway line, the County Council's opposition to increasing pedestrian traffic across the existing uncontrolled crossing to Hawks End Lane has already been noted. If, against the recommendation of the County Council, this were to form a main pedestrian route to the village centre, the County Council would expect improvements to be funded by this development. They might include provision of gates to replace existing stiles and improving the surface of the existing footpaths as a minimum.

There is some ambition amongst the local community for a footbridge across the railway to replace the current uncontrolled crossing. The County Council would support the provision of such a structure, but notes that this may not be a viable, or indeed the only, option.

Another option that should be explored is for this development to provide improved pedestrian and cycle routes from the new development, through the existing Station Road Industrial Estate. In addition to this, to enable countryside access from the new site and to mitigate the loss of the aforementioned existing crossing, this development could support the provision of a new route. As set out in a map attached, the new footpath would run parallel to and north of the railway line, linking with the existing network via an existing underpass, approximately 430m west of the existing uncontrolled crossing.

Education, Early Years Facilities and Other County Council infrastructure

The County Council's requests for developer contributions are set out in the appendix to this letter. Requests have been calculated according to the methodology set out in the Section 106 Developer's Guide to Infrastructure Contributions in Suffolk, which has been agreed and adopted by Mid Suffolk District Council as supplementary planning guidance.

The County Council expects all requests to be fulfilled, unless site viability presents an obstacle. In that instance, the County Council would be pleased to be involved in open-book negotiations with the applicant and the Local Planning Authority.

Flooding and Surface Water Management

The principles of disposing the surface water to the North West and conveying the water at or near the surface are acceptable.

The proposal will need to identify the natural blue corridors and deal with the inflow into the site. County Council officers would be willing to work with the developer to integrate the SuDS drainage into the proposed layout.

The discharge rate has been limited to the 'greenfield rate of run-off' and storage provided at the acceptable level, which is acceptable.

It is noted that some of the surface water is proposed to be discharged by infiltration and there is no report on groundwater pollution. The site is located on a soil protection zone 1 and will need to provide a risk assessment on infiltration.

Archaeology

The following has already been submitted in a letter from Richard Hoggett, dated 15th May 2013.

The proposal affects a large area which has not been the subject of previous systematic investigation. It is located to the east of the site of a medieval moated enclosure, recorded in the County Historic Environment Record (HER no. EWL 002), which was the manor of the Abbot of Bury St Edmunds and, therefore, a site of high archaeological importance. In addition the site is located close to a number of Roman finds and features (EWL 003, 004 and 013) as well as an area of Saxon and medieval finds (EWL 010). Any works causing significant ground disturbance have the potential to damage any archaeological deposit that exists.

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.

The following archaeological condition is recommended:

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

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

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

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

The County Council would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological investigation.

In this case, an archaeological evaluation will 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.

Landscape

Comments on landscape considerations have already been submitted by a County Council officer under the terms of a service level agreement with Mid Suffolk District Council. They represented a technical view, rather than Suffolk County Council's policy view. The following represents Suffolk County Council's policy view.

There is a risk that the visual benefits offered by the removal of the derelict buildings and associated infrastructure may be outweighed by the detrimental visual impacts of the development. For example, the present lighting after dark is likely to be at a minimal level. However, lighting associated with new housing and roads is likely to create significant impacts on the wider landscape and public views over the site. It is noted that no landscape buffer or mitigation has been included in the Indicative Master Plan (IMP).

The development provides scope to create a new landscape edge to the settlement, with community green space being provided at the same time. However there appears to be no specific proposals for the land, currently described as "Greenfield" and partly occupied by former settlement lagoons. Provision of a semi-natural green space, such as community woodland for example, would provide enhancement and a buffer to the farmed landscape, and properties to the north.

Outline consent should require the submission of a suitable master plan and design code to cover both urban and landscape design matters. The proposal should contribute to the character of the village.

Alongside the application there is the consideration of the need or otherwise for a relief road. The road and route, landscape and visual impact, design and landscape mitigation are matters that will require further detailed consideration. Any proposals for a relief road will need to be accompanied by a landscape assessment, design and mitigation proposals. Landscaping will be required on both sides of the road, creating landscape buffer to the wider countryside.

The route indicated for a potential future relief road will have an impact on local landscape features and property including:

- The setting of Elmswell St John the Divine church, a Grade 2* listed building.
- The almshouses.
- The setting of Elmswell Hall Grade 2 listed building.

- The properties alongside the existing lane north of the church.
- The sloping valley side north of the church.

It is suggested that options for minimising or eliminating these issues are explored, if proposals are developed.

Ecology

Based on the information submitted (ecological survey report Naturally Wild, Dec 2012) and the assessment of likely impacts, the County Council is satisfied that there is sufficient survey and assessment information on this topic to validate this application.

However, it is noted that the details for mitigation are intended to be secured under a Reserved Matters application at a future stage and any impacts from lighting and SUDs design etc may not have yet been assessed.

As development licences from Natural England will be needed for demolition of the buildings with bat roosts and translocation of Great crested Newts, these will both need mitigation and possibly compensatory measures identified and delivered in advance of losses.

It is therefore strongly recommended that appropriate mitigation and compensatory measures be identified in advance of the determination of this application as Mid Suffolk DC needs to ensure that the populations of protected species will not be adversely affected by this development. This is ensure that the Local Planning Authority can meet its legal duty to demonstrate compliance with Habitats Regulations.

The County Council is also concerned that additional protected species issues include translocation of slow-worms and a comprehensive ecological mitigation and compensation strategy needs to be produced prior to development.

Should there be a delay of more than 2 seasons, then an update to survey data will also be required to ensure anyone associated with the development avoids committing a wildlife crime.

Please also note that there are only 3 confirmed sites for Palmate Newt in Suffolk (SBRC records since 1980) as this species is not known outside of introductions. The County Council would query the presence of this amphibian on the development site and recommend that checks are made to confirm the identification in case additional ponds contain Great Crested Newts. This could affect the impact assessment for the outline application.

Older and Vulnerable People

The County Council wishes to see all development recognise the needs of the ageing population which it will serve. This position is in line with the National Planning Policy Framework, which notes the importance of creating healthy and inclusive communities (paragraph 88) and the need for developments to function well in the longer term (paragraph 58).

Mid Suffolk district is projected to see a 28% increase in the number of people aged 65 and over between 2012 and 2020, meaning that older people will make up 25% of the total population rather than 21% in 2012.¹

As described in paragraph 3.58 of the Mid Suffolk Core Strategy and enforced through policy CS 9, new development needs to recognise the needs of different groups in terms of dwelling mix and types. The County Council would go further and suggest that the design and layout of new development is also very important.

¹ Source: Projecting Older People Information System (POPPI), www.poppo.org.uk

The Planning Statement, in paragraphs 5.31-5.32, notes the National Housing Strategy as a material consideration. The County Council would agree that this is appropriate, and would draw attention to paragraph 35 of that report which says that 'New housing developments also need to make suitable provision for our ageing population in the long term' and goes on to suggest some of the measures for achieving that.²

The County Council would suggest that relevant measures are summarised well in the Government's 'Lifetime Neighbourhoods' report³ and that a proportion of new development should be built to the Lifetime Homes standard. As such, the Design and Access statement which will accompany the reserved matters application should set out how the development meets the needs of the ageing population, and the proposal should be assessed with that matter in mind.

I hope that these comments are helpful.

Yours sincerely,

John Pitchford
Spatial Planning and Sub Regional Partnerships Manager
Economy, Skills and Environment Directorate

² See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf

³ See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf

Appendix 1- Suffolk County Council's Requested Infrastructure Contributions

Please note that the education position set out in this letter was updated on 19th June 2013, following the Department for Education's decision to approve the Seckford Foundation's proposal for a secondary school in Ixworth. The revised position is set out in Appendix 2.



Mr Peter Goodyear,
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Your ref: 0846/13
Our ref: Elmswell – former Grampian
Harris, St Edmunds Drive
Date: 22 May 2013

Dear Peter,

Elmswell – former Grampian Harris, St Edmunds Drive – 0846/13 - developer contributions

I refer to your consultation letter dated 17 April 2013 asking for observations on planning application reference 0846/13. A holding response was made by the County Council on the basis that more time was required to fully and properly consider the transport implications including the assessment of the delivery of a 'relief road' which would include a bridge over the railway line. However I understand that in advance of these transport considerations the applicants are keen to understand other infrastructure implications which need to be considered and addressed. This response is therefore sent on that basis and will be incorporated into the corporate spatial planning response to be sent at a later date.

I previously provided pre-application advice in a letter dated 26 September 2012 (copy attached), based on different housing scenarios ranging from 200 up to 300 dwellings.

We are very grateful that you have shared the applicant's viability assessment report. I would like to be involved in further discussions to fully understand the implications for

S106 contributions and seek to agree a joint approach before the matter is reported to the Development Control Committee.

I set out below Suffolk County Council's views, which provides our infrastructure requirements that will need consideration by Mid Suffolk if residential development is successfully promoted on the site. The County Council will need to be a party to any sealed Section 106 legal agreement if there are planning obligations secured which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

The Core Strategy Focused Review was adopted by Mid Suffolk on the 20 December 2012 and now forms part of the Mid Suffolk Core Strategy and the Mid Suffolk Development Plan, which includes the following:

- Strategic Objectives SO3. To respond to the possible harm caused by climate change Mid Suffolk will seek to minimise its carbon footprint, by encouraging a shift to more sustainable travel patterns. In particular the Council will address congestion and pollution and ensure that all new development minimises its carbon emissions and carbon consumption and is adapted to future climate change.
- Strategic Objectives SO6. Provision of housing, employment, retail, infrastructure and access to services will be coordinated to ensure that delivery of necessary infrastructure takes place to accommodate new development and to enable communities to be balanced, inclusive and prosperous.
- Policy FC1 'Presumption in favour of Sustainable Development'.
- Policy FC1.1 'Mid Suffolk approach to delivering Sustainable Development'.

In addition to the above, there is the 2012 adopted 'Developers Guide to Infrastructure Contributions in Suffolk', which sets out the agreed approach to planning obligations with further information on education and other infrastructure matters in the topic papers.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' which can be viewed via the following webpage link <http://www.suffolk.gov.uk/business/planning-and-design-advice/planning-obligations/>

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

It has been widely reported that births are at an all time high for over 40 years, with a 40% increase. See article link in the EADT from Friday 25 January.
http://www.eadt.co.uk/news/ipswich_suffolk_baby_boom_leads_to_40pc_rise_in_new_arrivals_in_the_last_decade_1_1804706

We would anticipate the following **minimum** pupil yields from a development of 190 dwellings, namely:

- a. Primary school age range, 5-11: 48 pupils. Cost per place is £12,181 (2013/14 costs).
- b. Secondary school age range, 11-16: 34 pupils. Cost per place is £18,355 (2013/14 costs).
- c. Secondary school age range, 16+: 7 pupils. Costs per place is £19,907 (2013/14 costs).

Whilst Elmswell is within the Stowupland High School catchment the vast majority of pupils from the primary school currently attend Beyton Middle School and then go on to Thurston Community College. Schools in the Thurston pyramid will be moving from 3 to 2 tiers, which will be in place by September 2014. Schools in the Stowmarket High and Stowupland High school pyramids will be moving from 3 to 2 tiers, which will be in place by September 2015. Thurston Community College and Stowupland High School post-SOR will have a combined capacity of 3,175 places against a forecast of 3,220 pupils, which demonstrates that there is no surplus capacity available for pupils arising from new development.

The attached spreadsheet contains information about catchment schools capacities and forecasts based on January 2012 data.

Based on the existing capacity of the Elmswell CP School we forecast to have no surplus places and will therefore require a capital contribution of £584,688 (2013/14 costs) towards providing additional primary school places i.e. classroom extensions at the catchment primary school. At the secondary level we currently forecast to have no surplus places at Thurston Community College and Stowupland High School and will therefore require a capital contribution of £763,419 (2013/14 costs) towards providing additional secondary school places i.e. classroom extensions at the catchment secondary schools.

In summary we are seeking education capital contributions of £1,348,107 (2013/14 costs).

The scale of contributions is based on cost multipliers for the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2013/14 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times. Once the Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the Section 106 agreement until such time as the education contribution is due. SCC has a 10 year period from completion of the development to spend the contribution on education provision (refer to paragraph 8.1.3 of the education topic paper).

Clearly, local circumstances may change over time and I would draw your attention to paragraph 12 where this information is time-limited to 6 months from the date of this letter.

- 2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds. From these development proposals we would anticipate up to 13 pre-school pupils arising at a cost of £6,091 per place. We therefore request a capital contribution of £79,183 (2013/14 costs). This contribution will be spent in Elmswell to increase places for early education for 2, 3 & 4 year olds.

Elmswell has two registered providers - one a pre-school and the other full day nursery. The Day Nursery doesn't have a waiting list and has space for up to 10 children at the moment but this is full day care not just 2, 3, and 4 year olds. The Pre-School has a waiting list of two year olds (not eligible for funding) of 12 and can take up to 26 in any one session.

- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.
- 4. Transport issues.** Refer to the NPPF 'Section 3 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a development brief and/or any 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. The 'relief road' issue requires careful consideration in terms of necessity, costs, funding & deliverability and is currently the subject of detailed consideration by the County Council. This will be coordinated by Suffolk County Council FAO Dave Watson/Peter Black.
- 5. Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. The capital contribution towards libraries arising from this scheme based on the

approach set out in the adopted Developers Guide library topic paper is £41,040. This contribution will be spent at the local catchment library after consultation with the IPS (who manage the service on behalf of the County Council) and the Parish Council. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

Attached is information about the Elmswell Library located in Cooks Road. The existing library space is 85 square metres. The population of Elmswell is about 3,300, which when using the 30 square metres of library space per 1,000 population gives a local library space requirement of 99 square metres. This demonstrates an existing deficiency of 14 square metres in library space and further population growth associated with these 190 dwellings will place this community infrastructure under greater strain.

6. **Waste.** A waste minimisation and recycling strategy needs to be agreed and implemented by planning conditions. Refer to the Waste Planning Policy Statement and the Suffolk Waste Plan.
7. **Supported Housing.** Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. We would also encourage all homes to be built to 'Lifetime Homes' standards. Mid Suffolk will liaise with SCC and coordinate this. Refer to the NPPF 'Section 6 Delivering a wide choice of high quality homes'.
8. **Sustainable Drainage Systems.** Refer to the NPPF 'Section 10 Meeting the challenges of climate change, flooding and coastal change' It is anticipated that in October 2013; the sustainable drainage provisions within the Flood and Water Management Act 2010 will be implemented, requiring most developments to seek drainage approval from the county council and/or its agent alongside planning consent. At this time, the county council and/or its agent will be expected to adopt and maintain Sustainable Approval Body approved systems for more than one property and a mechanism for funding this ongoing maintenance is expected to be introduced by the Government.

In the interim, developers are urged to utilise sustainable drainage systems (SuDS) wherever possible, with the aim of reducing flood risk to surrounding areas, improving water quality entering rivers and also providing biodiversity and amenity benefits. The National SuDS guidance will be used to determine whether drainage proposals are appropriate. Under certain circumstances the County Council may consider adopting SuDS ahead of October 2013 and if this is the case would expect the cost of ongoing maintenance to be part of the Section 106 negotiation.

9. **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. We would strongly recommend the installation of automatic fire sprinklers.

10. **High-speed 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. Direct access from a new development to the nearest BT exchange is required (not just tacking new provision on the end of the nearest line). This will bring the fibre optic closer to the home which will enable faster broadband speed. Refer to the NPPF paragraphs 42 – 43.

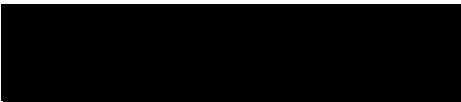
11. **Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

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

I consider that the contributions requested are justified, evidenced and satisfy the requirements of the NPPF and the CIL 122 Regulations. Please let me know if you require any further supporting information.

I would be grateful if this consultation response is reported to the Development Control Committee.

Yours sincerely,



Neil McManus
Planning Obligations Manager

cc Iain Maxwell, Suffolk County Council
Peter Black, Suffolk County Council
Dave Watson, Suffolk County Council
Jeff Horner, Suffolk County Council

Appendix 2- Suffolk County Council's Requested Infrastructure Contributions- Update

The following letter, dated 19th June 2013, updates Neil McManus' original letter.

Your ref: 0846/13
 Our ref: Elmswell – former Grampian Harris site
 Date: 19 June 2013
 Enquiries to: Neil McManus
 Tel: 01473 264121 or 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk



Mr Peter Goodyear,
 Senior Planning Officer,
 Mid Suffolk District Council,
 Council Offices,
 131 High Street,
 Needham Market,
 Suffolk, IP6 8DL.

Dear Peter

Elmswell: former Grampian Harris site – 0846/13 – developer contributions

I refer to planning application reference 0846/13 to which I responded by way of letter dated 22 May 2013.

Since my letter dated 22 May 2013 was sent the catchment secondary school position has changed. At the end of May the Secretary of State made an announcement that an 11 - 16 Free School bid had been approved on the Ixworth Middle School site. Under School Organisation Review (SOR) the Middle School will close in July 2014. However, following the Secretary of State's announcement a new Free School will open in September 2014 on the Middle School site. The new school will be run by the Seckford Foundation. This Free School falls within the catchment area of Thurston Community College and has a building capacity for 540 pupils. In view of this changes at the local level we will therefore no longer be seeking secondary school contributions i.e. we can assume that surplus places will be available for the 41 pupils ages 11 -18 arising. This reduces the education contribution sought from £1,348,107 (2013/14 costs) to £584,688 (2013/14 costs).

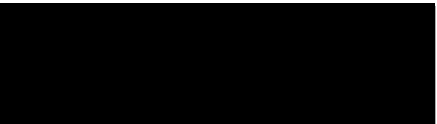
We will still require funding for the 48 primary age pupils arising at a cost of £584,688 (2013/14 costs).

The above information is time-limited until 31 August 2014 after which time we reserve the right to reassess if the planning application is not determined by then.

I hope this is seen as very good news from a viability perspective.

Can you please update me with the anticipated timetable for taking this application to committee and also let me know what progress is being made with the viability work and S106 package in order to deliver sustainable development. I would like to be involved with any discussions regarding viability if they impact on county council infrastructure requests.

Yours sincerely,



Neil McManus
Planning Obligations Manager
Economy Skills & Environment Directorate

cc Iain Maxwell, Suffolk County Council

Your Ref: MS/0846/13
 Our Ref: 570\CON\2497\13
 Date: 25 November 2013
 Enquiries to: PeterBlack
 Tel: 01473 265191
 Email: peter.black@suffolk.gov.uk

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

For the Attention of: Elizabeth Truscott

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990
 CONSULTATION RETURN MS/0846/13**

PROPOSAL: Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)

LOCATION: Former Grampian Food Site, St Edmunds Drive, Elmswell, Bury St Edmunds, Suffolk

ROAD CLASS:

Notice is hereby given that the County Council as Highway Authority make the following comments:

3.2

It is not the best route through the industrial estate for pedestrians but it will be a lot safer than the rail crossing. The disadvantage of this route is that pedestrians and cyclists will still have to wait at the crossing. The industrial estate roads will need to be upgraded to accommodate pedestrians and cyclists. This will include improving the footways and street lighting.

With the increase in pedestrian movement from this site the closure of the uncontrolled level crossing should be secured prior to granting permission and the provision of a footbridge should be a priority.

5.2.1

As there is no likely date for the bypass road to be built, the proposed layout is not acceptable. It will require all vehicles exiting the site to give way. This will lead to complacent driving and if there

is the rare time when a vehicle did use the road there is a danger of collision. There should be priority for the development until such time as the link road is built.

5.2.2

DMRB standards are appropriate as MfS does not show the details of a turn right lane. With the recorded speeds on Station Road the junction must be built to DMRB standards.

5.2.3

A visibility splay of 120m is required as MfS only gives distances for speeds up to 37mph and as the 85th %tile is 38.5 DMRB is appropriate.

5.2.4

Safety Audits will be required as part of the section 278 agreement.

5.2.5

The proposals are not acceptable. Over running islands do not make it safe for pedestrians. We should not be proposing something that could be a hazard. The design must cater for all highway users.

The island in the access road should be at least 2m wide to accommodate pedestrians. Also dropped kerbs are required on both side of the access. These are issues that would be raised by a Safety Audit if one had been undertaken.

If the developer does not wish to change this design and use a non-standard island then a stage 1 safety audit should be undertaken prior to decision.

6.2.1

Accepted

10.2.3

Where did the figures for the extant use come from? My understanding is that the old factory site worked shift patterns so there was minimal traffic during the rush hours.

Table 10-3

The pm peak gives me some concerns. If the trains are on time there is a window of just over a minute to clear 50 vehicles. I do not think this is realistic and there will be residual vehicle when the barriers go down again. The effect of this could be classed as severe.

There has been no attempt to obtain freight movements during the peak times. Freight trains do use this route and are not restricted to off peak times. The effect of these freight trains will have a big bearing on the queues. A more robust assessment is required to demonstrate how the increase in rail traffic and vehicular traffic associated with the proposed development will increase queuing and delay at the crossing.

Currently the access is not designed to a standard that is acceptable to the Highway Authority.

Yours faithfully

Mr Peter Black
Development Management Engineer
Highway Network Improvement Services
Economy, Skills & Environment

Mr Peter Goodyear
Mid Suffolk District Council
Planning Department
131, Council Offices High Street
Needham Market
Ipswich
IP6 8DL

Our ref: AE/2013/116025/01-L01
Your ref: 0846/13
Date: 10 May 2013

Dear Mr Goodyear

OUTLINE PLANNING APPLICATION FOR DEMOLITION OF ALL BUILDINGS ON SITE (COMPRISING REDUNDANT FACTORY BUILDINGS IN USE CLASS B2, SETTLEMENT TANKS AND 6 DERELICT RESIDENTIAL PROPERTIES) AND ERECTION OF UP TO 190 RESIDENTIAL DWELLINGS AND PUMPING STATION. CONSTRUCTION OF A NEW ACCESS ROAD TO STATION ROAD. (APPEARANCE, LAYOUT AND SCALE TO BE THE SUBJECT OF A FUTURE RESERVED MATTER APPLICATION). - FORMER GRAMPIAN HARRIS, ST EDMUNDS DRIVE, ELMSWELL.

Thank you for your consultation received on 17 April 2013. We have inspected the application, as submitted, and are raising a holding objection on both flood risk grounds and the risk to groundwater.

Surface Water Management

In the absence of an acceptable Flood Risk Assessment (FRA) we are raising a holding objection to the grant of planning permission for the following reasons:

- The applicant has not demonstrated that the discharge volume of surface water run-off from the proposed development will not exceed that of the existing site.
- Further information is required confirming that the current drainage network discharges to the northern ditch network.

This may increase the flood risk in surrounding areas.

To overcome our objection, the applicant must demonstrate through their surface water strategy that the proposed development will not create an increased risk of flooding from surface water.

The difference in runoff volume pre- and post-development (the additional runoff generated) should be disposed of by way of infiltration or, if this is not feasible because of the soil type, discharged from the site at flow rates below 2 l/s/ha. Where it is not

feasible, the limiting discharge for the 30- and 100-year return periods will be constrained to the mean annual peak runoff for the Greenfield site (referred to as QBAR in IoH Report 124).

The revised surface water strategy should clearly show that:

- Peak discharge rates from site will not increase as a result of the proposed development, up to a 1 in 100 year storm with a suitable allowance for climate change;
- Preferred option – the applicant should aim to achieve Greenfield runoff rates to reduce the impact of the development on the surface water drainage infrastructure.
- Discharge volumes from site will not increase as a result of the proposed development, up to a 1 in 100 year storm with a suitable allowance for climate change;
- Surface water for up to the 1 in 30 year storm event should be safely contained within the proposed drainage network. It is acceptable to partially flood the site in the 1 in 100 year plus suitable allowance for climate change storm event; however this water should be safely contained on site. Where this flooding will be within roads or pathways, the applicant must ensure that safe access and egress is still available.

Advice to LPA/Applicant

Perimeter Swales

It is indicated within the drainage plan that perimeter swales will be used to convey the surface water run off to the detention pond. Although we strongly support this technique, we would recommend that this be incorporated into the master plan to ensure sufficient space is identified within the development layout. Retrofitting the swales into the design at a later stage will be problematic. It should be noted that swales should not have a side gradient of more than 1 in 3 (preferably 1 in 4) and have wide bases. This will often result in wide swales where they have to convey flows from large catchments.

Consideration should also be given to the maintenance requirements of these swales. This mostly consists of litter picking and grass cutting. This will require access to be maintained at all times. This is generally easier if the swales are incorporated within the development rather along the edge. Swales can be incorporated into landscaped areas within the development to create a green corridor through the development. This will provide additional amenity value to the development.

It is indicated that this is the first phase of a larger development, including a future link road. The northern swale may be required to convey the future run off from this link road.

SuDS Measures

We would always strongly recommend that for outline applications, all types of SuDS are evaluated for their suitability within the context of the development's objectives. This will ensure that all feasible options are available to the master planner/drain engineer when producing the detail design of the development.

Source control measures such as bio-retention and permeable paving (tanked and under drained) can be utilised to provide additional attenuation within the development.

Risk to Groundwater

We are also raising a holding objection to the proposed development as submitted because there is insufficient information to demonstrate that the risk of pollution to the water environment is acceptable.

There are two strands to this objection. These are that:

- We consider the level of risk posed by this proposal to be unacceptable.
- The application fails to provide assurance that the risks of pollution are understood, as a preliminary risk assessment (including a desk study, conceptual model and initial assessment of risk) has not been provided. It requires a proper assessment whenever there might be a risk, not only where the risk is known.

Reason

The site overlies Crag and Cam and Ely Ouse Chalk (Principal Aquifers) and is adjacent to Secondary A aquifers (sand and gravel of the Lowestoft Formation). The site is also within a Source Protection Zone 1 (SPZ1) and EU Water Framework Directive drinking water protected area (DrWPA).

The SPZ1 means that contaminants entering groundwater at the site may contaminate the protected supply within 50 days. It is a zone that is designed to protect groundwater drinking supplies from becoming contaminated with toxic chemicals and water-borne diseases. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. The use of groundwater in the area makes the site vulnerable to pollution.

The water environment adjacent to and beneath the site (particularly the underlying SPZ1, Primary and adjacent Secondary aquifers, EU Water Framework Directive DrWPA and surface water features) are therefore vulnerable to potential pollutants associated with current and previous land uses (specifically, the former bacon factory) and we require land contamination information in line with the National Planning Policy Framework (NPPF; paragraphs 109, 121), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater Protection (GP3:2012) position statements A2 to A6 and J5 to J7.

The applicant should provide information to satisfactorily demonstrate to the Local Planning Authority that the risk to the water environment has been fully understood and can be addressed through appropriate measures. This information should include:

1. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
2. A scheme for surface water disposal submitted to and approved in writing by the local planning authority. Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality. The scheme shall be implemented as approved.

- (1)
3. Piling or any other foundation designs and investigation boreholes using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Advice to LPA

As mentioned above, the application is located on the site of a former bacon factory and is acknowledged to be contaminated in the application form. However, no desk study or site investigation was submitted with the application. According to the Bidwells Planning Statement, a Phase I and Phase II Geo-environmental Assessment, DQRA and Remediation Strategy have been undertaken by Wardell Armstrong. This should be submitted with the application.

SuDS (including swales) have been proposed, but no detailed drainage plans have been included.

Advice to Applicant

Land Contamination

Land contamination investigations should be carried out in accordance with BS 5930:1999-2010 'Code of Practice for site investigations' and BS 10175:2011 'Investigation of potentially contaminated sites - Code of Practice' as updated/amended. Site investigation works should be undertaken by a suitably qualified and experienced professional. Soil and water analysis should be fully MCERTS accredited. Any further site investigation, demolition, remediation or construction works on site must not create new pollutant pathways or pollutant linkages in to the underlying principal aquifer to avoid generating new contaminated land liabilities for the developer. Clean drilling techniques may be required where boreholes, piles etc penetrate through contaminated ground.

SuDS

The maximum acceptable depth for infiltration Suds is 2.0m below ground level, with a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels, which have yet to be ascertained. We consider that deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). Deep soakaways increase the risk of groundwater pollution. See our Groundwater Protection GP3 (2012) documents, particularly G9, for further information.

It should be noted that due to the anticipated geology underlying the site, poor infiltration rates should be anticipated and SuDS should be designed accordingly, and alternative methods of surface water disposal may be appropriate.

Sustainability and adapting to climate change

In October 2011 the Environment Agency took on a new role from Government to

... provide advice and support to businesses, public sector and other organisations on adapting to a changing climate. Please find attached Appendix 1 which gives information to yourselves and the applicant on sustainability and adapting to climate change.

We trust this advice is useful.

Yours sincerely

Miss Lizzie Griffiths
Planning Liaison Officer

Direct dial 01473 706820

Direct e-mail lizzie.griffiths@environment-agency.gov.uk

Sustainability and adapting to climate change

With new information becoming available on the impacts of climate change it is important that the proposed development is carried out in as sustainable manner as possible. With this in mind, the highest possible standards of sustainable construction and design must be incorporated. This would be in line with the objectives in the "Achieving sustainable development" chapter of the National Planning Policy Framework.

Construction

Development should seek to minimise the use of resources and the production of waste by incorporating, for example, passive systems using natural light, air movement and thermal mass. High levels of energy and water efficiency must also be ensured.

"Building a Greener Future: Towards Zero Carbon Development" sets out the Government's objectives in achieving zero carbon emission developments by 2016. This will be achieved in a three step process: by 2010 the Government would like to see a 25% improvement in the carbon/energy performance set by building regulations, this will increase to 44% by 2013 and the final target is zero carbon in 2016.

The recently published Code for Sustainable Homes ties in with the above objectives. It has been developed using the EcoHomes System and improves upon this system with the plan being to eventually replace the EcoHomes/BREEAM systems with the Code for Sustainable Homes during 2007.

This scheme has greater benefits because it has minimum requirements for both water and energy efficiency for every different rating, as well as minimum requirements for materials, surface water run-off and waste. We would therefore promote the use of the newer Code for Sustainable Homes, rather than EcoHomes/BREEAM.

It may be unreasonable at this time to expect all developments to be carbon neutral so we would suggest that, as a minimum at least a 3 star rating under the Code is achieved for this development. This will assist the Local Authority in achieving their renewable energy targets under the Home Energy Conservation Act 1996, as well as contributing towards other sustainability objectives.

Waste

Whilst it is no longer a legal requirement you should consider having a site waste management plan.

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable for any off-site movements of wastes. The developer as waste producer therefore has a duty of care to ensure all materials removed go to an appropriate permitted facility and all relevant documentation is completed and kept in line with regulations. Because you will need to record all waste movements in one document, having a SWMP will help you to ensure you comply with the duty of care.

The developer must apply the waste hierarchy in a priority order of prevention, re-use, recycling before considering other recovery or disposal options.

If any waste is to be used on site, the applicant will be required to obtain the appropriate waste exemption or permit from us. We are unable to specify what exactly would be required if anything, due to the limited amount of information provided. The applicant is advised refer to guidance on our website www.environment-agency.gov.uk/subjects/waste.

The management of waste should be considered as early as possible during the design phase to ensure that minimal volumes of waste arise during the construction of the development, and the demolition at the end of its life. This can include measures such as preventing the over-ordering of materials, reducing damage to materials before use by careful handling and segregating waste on site into separate skips. The developer should consider how they will incorporate recycled/recovered materials into the building programme, including the use of secondary and recycled aggregates, and re-use of any on-site demolition waste.

The design of the development can also influence the ability of residents to be able to recycle their waste and we would suggest that designs incorporate facilities to aid in this, especially in multiple-occupancy buildings. We would also suggest that consideration is given to the provision for recycling within public areas. We recommend the following websites which provide ideas and further information: <http://www.wrap.org.uk> and <http://www.tcpa.org.uk/pages/towards-zero-waste.html>.

Biodiversity

This NPPF paragraph 109 recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity

Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

Water resources

We endorse the efficient use of water, especially in new developments. Our Water Demand Management Team can provide information and advice on any aspect of water conservation including water saving technologies. New developments could take economic advantage of these technologies and should be considered. Wide spread use of these and other technologies ensure efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area.

Further advice can be obtained from our website at [Environment Agency - Save Water](#), and from [Code for Sustainable Homes](#).

Further information on adapting to climate change can be found here
<http://www.environment-agency.gov.uk/research/137557.aspx>

Economy, Skills and Environment
9-10 The Churchyard, Shire Hall
Bury St Edmunds
Suffolk
IP33 1RX

Philip Isbell
Professional Lead Officer
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Richard Hoggett
Direct Line: 01284 741226
Email: richard.hoggett@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2013_0846
Date: 15 May 2013

For the Attention of Peter Goodyear

Dear Mr Isbell

Planning Application 0846/13: Former Grampian Harris, St Edmund's Drive, Elmswell: Archaeology

The proposal affects a large area which has not been the subject of previous systematic investigation. It is located to the east of the site of a medieval moated enclosure, recorded in the County Historic Environment Record (HER no. EWL 002), which was the manor of the Abbot of Bury St Edmunds and, therefore, a site of high archaeological importance. In addition the site is located close to a number of Roman finds and features (EWL 003, 004 and 013) as well as an area of Saxon and medieval finds (EWL 010). Any works causing significant ground disturbance have the potential to damage any archaeological deposit that exists.

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.

The following archaeological condition is recommended:

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

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

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording

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

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological investigation.

In this case, an archaeological evaluation will 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.

Yours sincerely



Richard Hoggett

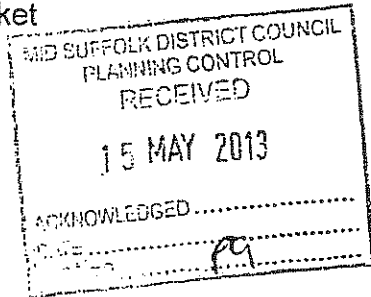
Archaeological Officer
Conservation Team



Suffolk Fire and Rescue Service

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

Mid Suffolk District Council
Environment and Planning
131 High Street
Needham Market
IP6 8DL



Your Ref:
Our Ref: FS/F31/0666/AK
Enquiries to: Angela Kempen
Telephone: 01473 260588
E-mail: fire.admin@suffolk.gov.uk
Fax: 01473 216847
Web Address: http://www.suffolk.gov.uk
Date:

Dear Sirs

Former Grampian Country Foods, St Edmunds Drive, Elmswell IP30 9HF
Planning Application No: 0846/13

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations 2000 Approved Document B, Volume 2, 2006 Edition Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses, and, similarly, Volume 1, Part B5, Section 11, in the case of 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.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/18 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition.

Water Supplies

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

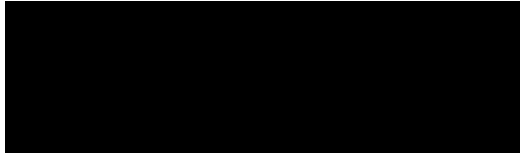
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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and 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.

Yours faithfully



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr G Bloomfield, Bidwells, 16 Upper King Street, Norwich, NR3 1HA

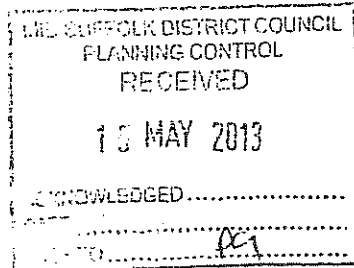
Enc (agent only): Sprinkler information



Suffolk Fire and Rescue Service

Mid Suffolk District Council
 Environment and Planning
 131 High Street
 Needham Market
 IP6 8DL

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



Your Ref:
 Our Ref: ENG/AK
 Enquiries to: Mrs A Kempen
 Direct Line: 01473 260486
 Fax: 01473 216847
 E-mail: Angela.Kempen@fire.suffolkcc.gov.uk
 Web Address: <http://www.suffolk.gov.uk>
 Date: 14 May 2013

Planning Ref: 0846/13

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING

ADDRESS: Former Grampian Country Foods, St Edmunds Drive, Elmswell IP30 9HF

DESCRIPTION: Residential development of up to 190 dwellings

NO: HYDRANTS POSSIBLY REQUIRED: Required

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

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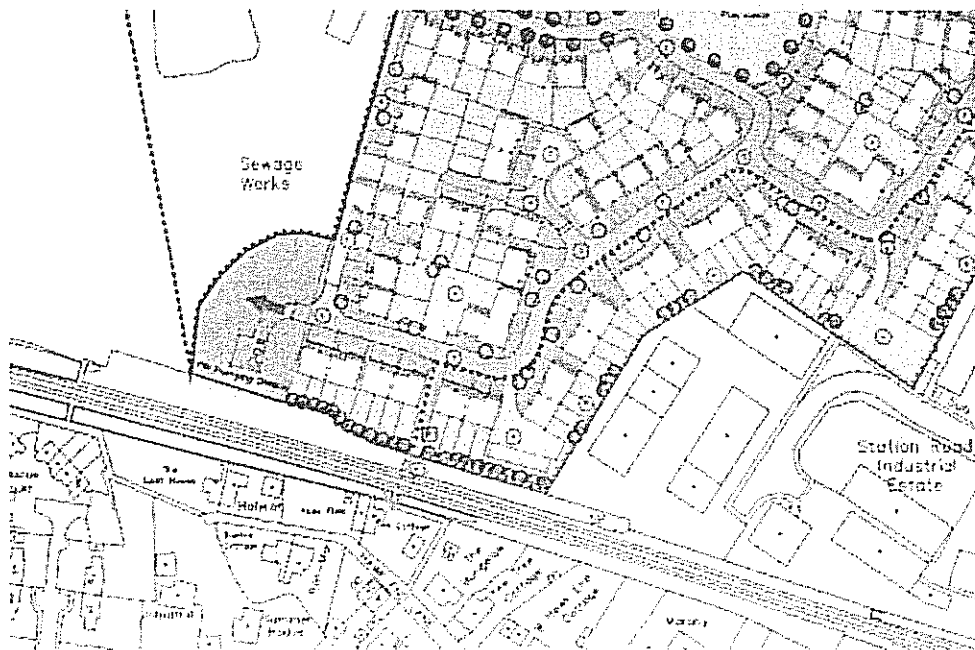
Should you require any further information or assistance I will be pleased to help.

Yours faithfully



Mrs A Kempen
Water Officer

The 'Bacon Factory' planning application.
 Railway line crossing
 Mike Friend – Sol Indurain.



Introduction

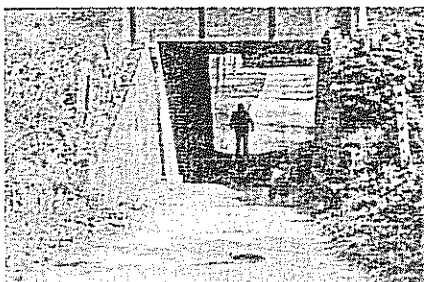
During the last planning meeting a resident identified the fact that an unprotected pedestrian railway line crossing was highlighted on the proposal plans with the result that, this very little known or used crossing would suddenly become a major pathway for residents of the new homes to the services available on the south side of the railway line rather than using the access into Station Road through the planned link road section. The resident also informed us that he had informally spoken to the rail authorities who allegedly expressed their lack of concern until there is a fatal accident. However, it is evident that facilitating the crossing as currently proposed will encourage a large section of the residents to access the south side of the village at that site and, therefore, increase the risk of accidents/fatalities to an unacceptable level.

Background and findings

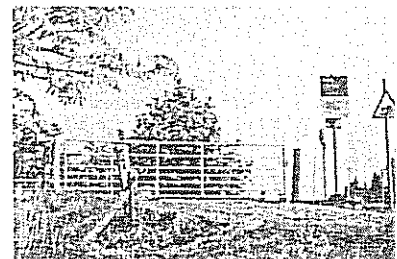
As we were not familiar with the footpath and crossing we visited the location where we again spoke to the resident and examined all aspects of the line between Penny Lane (off School Rd bend) and the level crossing.

In Penny Lane we found the junction of various footpaths where the road goes under the railway so it can be crossed safely.

Above it there is a farm crossing controlled by the farmer and of no consequence to the footpaths.

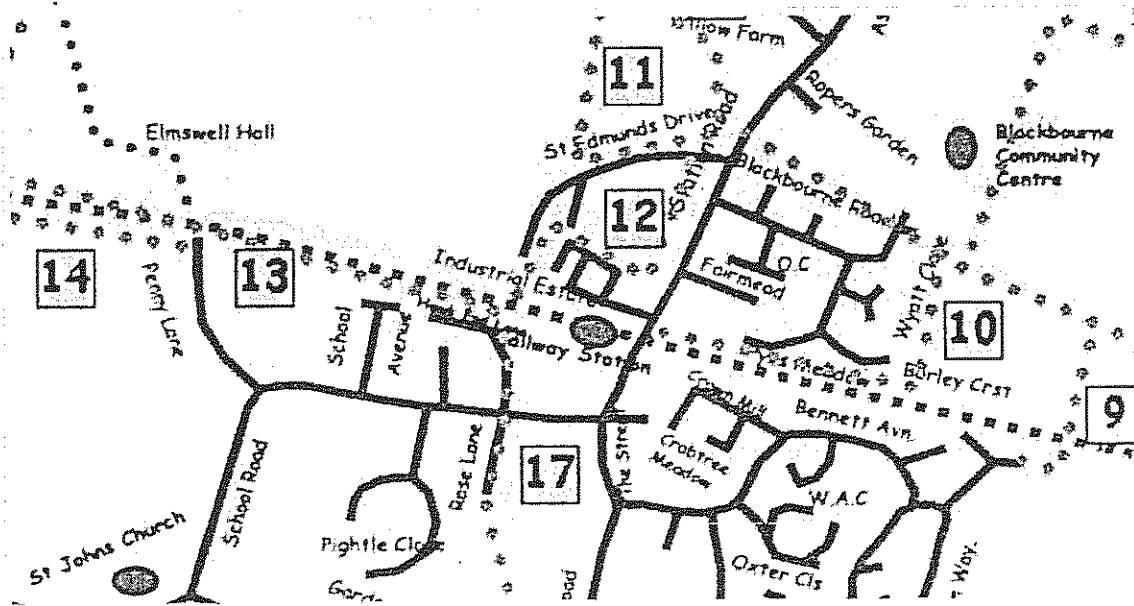


Tunnel under line in Penny Lane

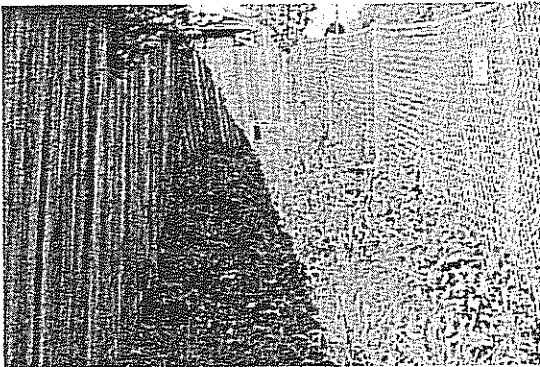


Farm Crossing

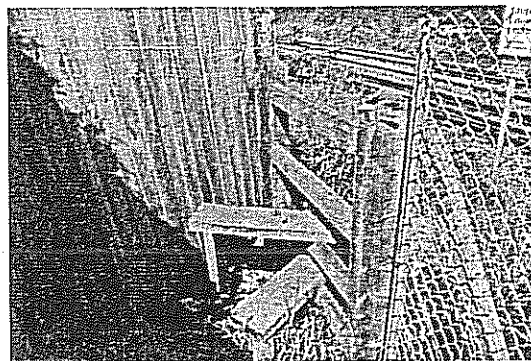
Path 13 then runs parallel to the railway line on the south side towards the station until it reaches the west end of Hawk End Lane where it continues south (path 17) and north (path 12) crossing the railway



The entry to the line crossing is through a narrow alleyway between houses and access to the crossing is via a style. The steps have lichen growing on them indicating that the path is not commonly/widely used (residents cut the weeds back on a regular basis)



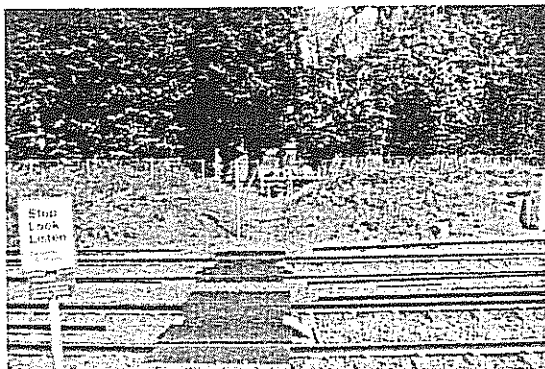
Hawk End Lane footpath



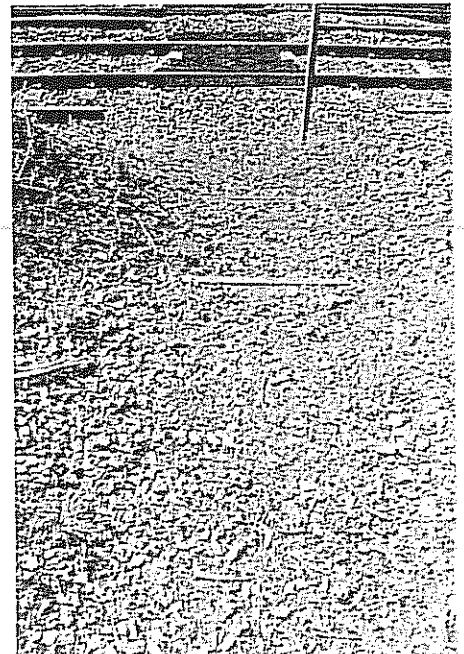
Style

There are steps cut into the embankment and timber step edges keep back shingle to form steps although they appear to need some attention

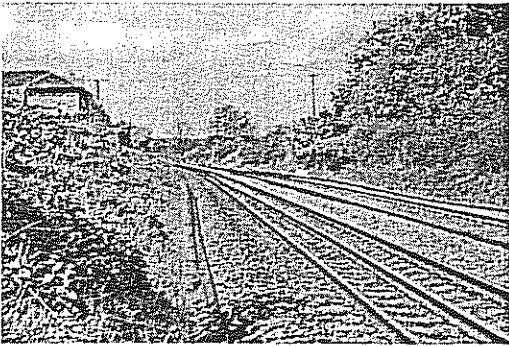
The line crossing from side to side is a properly constituted line crossing with pedestrian plates and large clear warning signs.



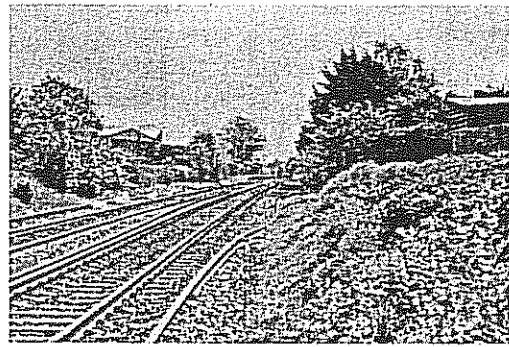
View from Hawk End Lane



Westwards there is a bend in the line that could obscure a fast moving train from those with poor site or impaired ability and it was noted that, when hearing a train approaching us from the Bury direction it took about 4 seconds to reach our position.

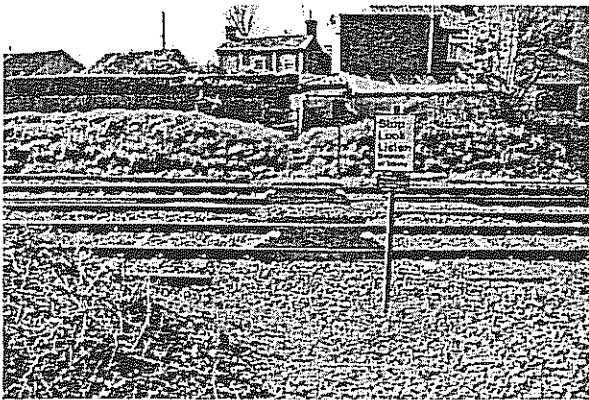


Westwards (BSE)

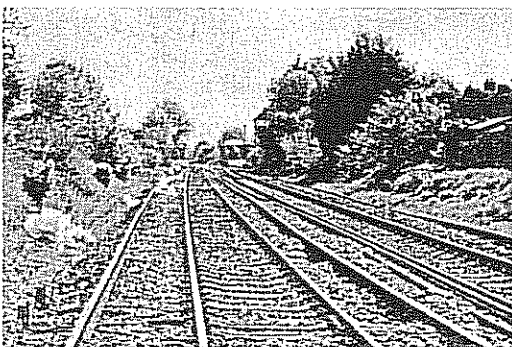
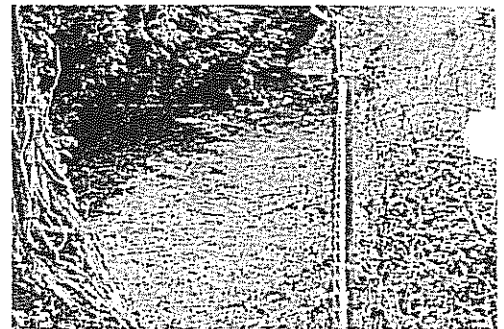


Eastwards (station)

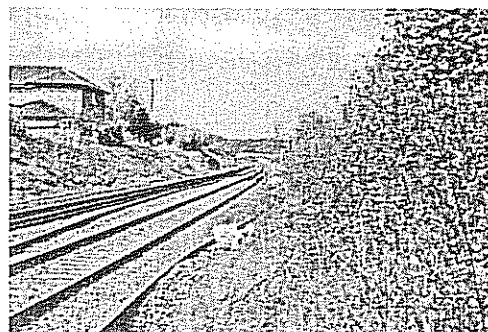
Having crossed the line it was evident that the footpath is not widely used as mature trees block part of the path alongside the line and it becomes very narrow and overgrown when turning north behind the industrial estate.



The line crossing from the north side



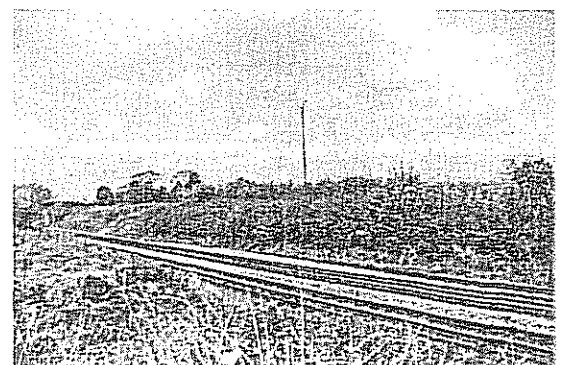
Eastwards (station)



Westwards (BSE)

We understand that there was a previous pedestrian crossing a bit further to the west which was closed some time ago. Looking at the old site the embankment cutaway can be clearly seen and just beyond this point the embankments are quite wide and quite high.

Old crossing point. note dip



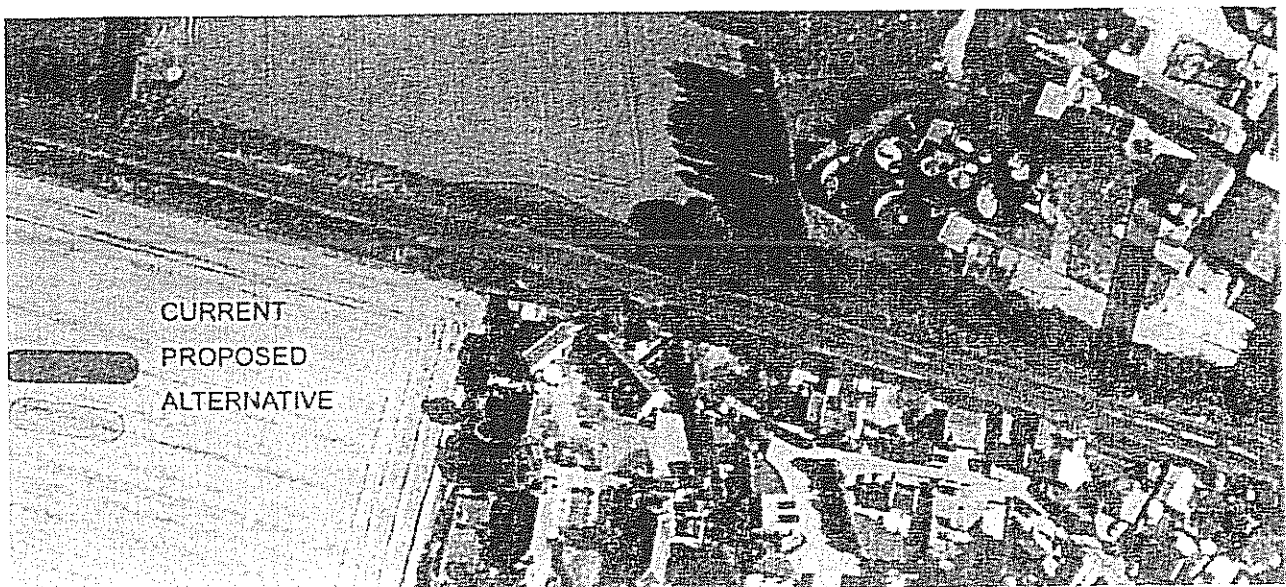
Conclusions.

1. The line is getting busier with freight traffic
2. People are not good at estimating the speed of things moving towards them – Hence level crossing accidents at 'T' Junction Car crashes
3. People impaired by sight, medication, age or disability would be at great risk
4. Poor weather will reduce visibility of train traffic, icy surface may add slipping to the dangers on the actual walkway across the line
5. The crossing is little used and it was noted that the driver of a train leaving the station appeared surprised/concern of our presence in the area
6. 190 new properties (with the potential of many more at a later date in the adjacent site) will greatly increase the risk day on day of an accident, as this crossing is used to 'nip and get a bags of chips' 'Have a quick pint before they close' etc
7. Children will be at great risk due to their poor speed/time appreciation, especially when dragging toys or stopping to pick up a toy.
8. We do not believe the speed of the through trains is such that one could stop even if the driver saw someone on the line – at night trains do not have forward floodlighting
9. There is the risk of people waiting for a train to pass then stepping out in front of another in the opposite direction
10. We do not believe we can accept the risks

Suggestions.

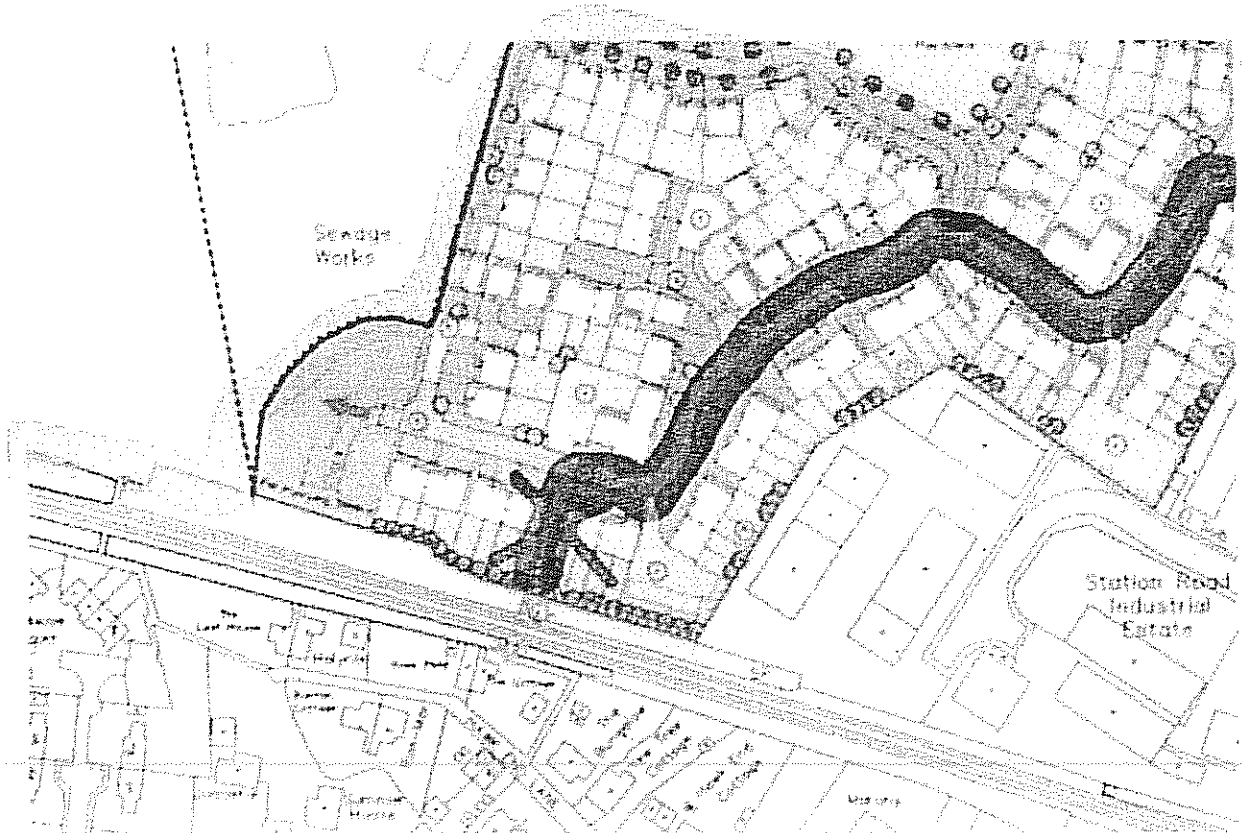
Whilst we are aware that the following suggestions may impact on the allocation of capital towards a bypass the risk factors must be assessed and dealt with as by facilitating its access will attract its use on a regular basis by the occupants of the new homes, using it as a shortcut to take away food, pub, chemist, station, bus route and other services on the south side of the station.

The fact that the site will be expanded westwards in the future would allow for the footpath to move west for about 200 metres and still be accessible to the new estate



Having taken the above factors into consideration we have the following options which, during the forthcoming village meeting, can be reviewed, commented and additional suggestions added/noted:

1. The crossing should be relocated about 200 meters west, ideally after the last house to minimise disturbance, overview of private gardens etc.
2. A footbridge to be established on that site; the embankments are higher allowing a footbridge of a shorter construction, the feed onto the bridge could be by ramp to allow mobility scooters, wheelchairs or cyclists to access.
3. If a footbridge is not possible then move the current crossing site to the new proposed site with electronic gates fitted that operate with the level crossing
4. The proposed alteration to the footpath through the new estate to be altered so there is no gap between the houses that allows access to the current crossing but continues westwards to join the suggested new north side of the crossing; it can be routed through the green spaces in the current and future planning applications
5. Whilst the new crossing is established the current path and crossing to remain unaltered until it can be permanently closed and sealed



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Economy, Skills and Environment

Mr Peter Goodyear,
Planning Services,
Senior Planning Officer,
Planning Services,
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Suffolk, IP6 8DL.

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Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk
Web: www.suffolk.gov.uk

Your ref: 0846/13
Our ref: Elmswell – former Grampian
Harris, St Edmunds Drive
Date: 22 May 2013

Dear Peter,

Elmswell – former Grampian Harris, St Edmunds Drive – 0846/13 - developer contributions

I refer to your consultation letter dated 17 April 2013 asking for observations on planning application reference 0846/13. A holding response was made by the County Council on the basis that more time was required to fully and properly consider the transport implications including the assessment of the delivery of a 'relief road' which would include a bridge over the railway line. However I understand that in advance of these transport considerations the applicants are keen to understand other infrastructure implications which need to be considered and addressed. This response is therefore sent on that basis and will be incorporated into the corporate spatial planning response to be sent at a later date.

I previously provided pre-application advice in a letter dated 26 September 2012 (copy attached), based on different housing scenarios ranging from 200 up to 300 dwellings.

We are very grateful that you have shared the applicant's viability assessment report. I would like to be involved in further discussions to fully understand the implications for S106 contributions and seek to agree a joint approach before the matter is reported to the Development Control Committee.

I set out below Suffolk County Council's views, which provides our infrastructure requirements that will need consideration by Mid Suffolk if residential development is successfully promoted on the site. The County Council will need to be a party to any sealed Section 106 legal agreement if there are planning obligations secured which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

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The Core Strategy Focused Review was adopted by Mid Suffolk on the 20 December 2012 and now forms part of the Mid Suffolk Core Strategy and the Mid Suffolk Development Plan, which includes the following:

- Strategic Objectives SO3. To respond to the possible harm caused by climate change Mid Suffolk will seek to minimise its carbon footprint, by encouraging a shift to more sustainable travel patterns. In particular the Council will address congestion and pollution and ensure that all new development minimises its carbon emissions and carbon consumption and is adapted to future climate change.
- Strategic Objectives SO6. Provision of housing, employment, retail, infrastructure and access to services will be coordinated to ensure that delivery of necessary infrastructure takes place to accommodate new development and to enable communities to be balanced, inclusive and prosperous.
- Policy FC1 'Presumption in favour of Sustainable Development'.
- Policy FC1.1 'Mid Suffolk approach to delivering Sustainable Development'.

In addition to the above, there is the 2012 adopted 'Developers Guide to Infrastructure Contributions in Suffolk', which sets out the agreed approach to planning obligations with further information on education and other infrastructure matters in the topic papers.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' which can be viewed via the following webpage link <http://www.suffolk.gov.uk/business/planning-and-design-advice/planning-obligations/>

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

It has been widely reported that births are at an all time high for over 40 years, with a 40% increase. See article link in the EADT from Friday 25 January.
http://www.eadt.co.uk/news/ipswich_suffolk_baby_boom_leads_to_40pc_rise_in_new_arrivals_in_the_last_decade_1_1804706

We would anticipate the following **minimum** pupil yields from a development of 190 dwellings, namely:

- a. Primary school age range, 5-11: 48 pupils. Cost per place is £12,181 (2013/14 costs).
- b. Secondary school age range, 11-16: 34 pupils. Cost per place is £18,355 (2013/14 costs).
- c. Secondary school age range, 16+: 7 pupils. Costs per place is £19,907 (2013/14 costs).

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Whilst Elmswell is within the Stowupland High School catchment the vast majority of pupils from the primary school currently attend Beyton Middle School and then go on to Thurston Community College. Schools in the Thurston pyramid will be moving from 3 to 2 tiers, which will be in place by September 2014. Schools in the Stowmarket High and Stowupland High school pyramids will be moving from 3 to 2 tiers, which will be in place by September 2015. Thurston Community College and Stowupland High School post-SOR will have a combined capacity of 3,175 places against a forecast of 3,220 pupils, which demonstrates that there is no surplus capacity available for pupils arising from new development.

The attached spreadsheet contains information about catchment schools capacities and forecasts based on January 2012 data.

Based on the existing capacity of the Elmswell CP School we forecast to have no surplus places and will therefore require a capital contribution of £584,688 (2013/14 costs) towards providing additional primary school places i.e. classroom extensions at the catchment primary school. At the secondary level we currently forecast to have no surplus places at Thurston Community College and Stowupland High School and will therefore require a capital contribution of £763,419 (2013/14 costs) towards providing additional secondary school places i.e. classroom extensions at the catchment secondary schools.

In summary we are seeking education capital contributions of £1,348,107 (2013/14 costs).

The scale of contributions is based on cost multipliers for the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2013/14 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times. Once the Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the Section 106 agreement until such time as the education contribution is due. SCC has a 10 year period from completion of the development to spend the contribution on education provision (refer to paragraph 8.1.3 of the education topic paper).

Clearly, local circumstances may change over time and I would draw your attention to paragraph 12 where this information is time-limited to 6 months from the date of this letter.

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

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would anticipate up to 13 pre-school pupils arising at a cost of £6,091 per place. We therefore request a capital contribution of £79,183 (2013/14 costs). This contribution will be spent in Elmswell to increase places for early education for 2, 3 & 4 year olds.

Elmswell has two registered providers - one a pre-school and the other full day nursery. The Day Nursery doesn't have a waiting list and has space for up to 10 children at the moment but this is full day care not just 2, 3, and 4 year olds. The Pre-School has a waiting list of two year olds (not eligible for funding) of 12 and can take up to 26 in any one session.

3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
 - a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** Refer to the NPPF 'Section 3 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a development brief and/or any 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. The 'relief road' issue requires careful consideration in terms of necessity, costs, funding & deliverability and is currently the subject of detailed consideration by the County Council. This will be coordinated by Suffolk County Council FAO Dave Watson/Peter Black.

5. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. The capital contribution towards libraries arising from this scheme based on the approach set out in the adopted Developers Guide library topic paper is £41,040. This contribution will be spent at the local catchment library after consultation with the IPS (who manage the service on behalf of the County Council) and the Parish Council. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

Attached is information about the Elmswell Library located in Cooks Road. The existing library space is 85 square metres. The population of Elmswell is about

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3,300, which when using the 30 square metres of library space per 1,000 population gives a local library space requirement of 99 square metres. This demonstrates an existing deficiency of 14 square metres in library space and further population growth associated with these 190 dwellings will place this community infrastructure under greater strain.

6. **Waste.** A waste minimisation and recycling strategy needs to be agreed and implemented by planning conditions. Refer to the Waste Planning Policy Statement and the Suffolk Waste Plan.
7. **Supported Housing.** Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. We would also encourage all homes to be built to 'Lifetime Homes' standards. Mid Suffolk will liaise with SCC and coordinate this. Refer to the NPPF 'Section 6 Delivering a wide choice of high quality homes'.
8. **Sustainable Drainage Systems.** Refer to the NPPF 'Section 10 Meeting the challenges of climate change, flooding and coastal change' It is anticipated that in October 2013; the sustainable drainage provisions within the Flood and Water Management Act 2010 will be implemented, requiring most developments to seek drainage approval from the county council and/or its agent alongside planning consent. At this time, the county council and/or its agent will be expected to adopt and maintain Sustainable Approval Body approved systems for more than one property and a mechanism for funding this ongoing maintenance is expected to be introduced by the Government.

In the interim, developers are urged to utilise sustainable drainage systems (SuDS) wherever possible, with the aim of reducing flood risk to surrounding areas, improving water quality entering rivers and also providing biodiversity and amenity benefits. The National SuDS guidance will be used to determine whether drainage proposals are appropriate. Under certain circumstances the County Council may consider adopting SuDS ahead of October 2013 and if this is the case would expect the cost of ongoing maintenance to be part of the Section 106 negotiation.

9. **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. We would strongly recommend the installation of automatic fire sprinklers.
10. **High-speed 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. Direct access from a new development to the nearest BT exchange is required (not just tacking new provision on the end of the nearest line). This will bring the fibre optic closer to the home which will enable faster broadband speed. Refer to the NPPF paragraphs 42 – 43.
11. **Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

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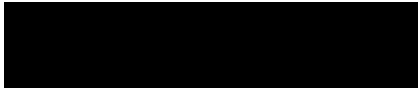
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12. The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified, evidenced and satisfy the requirements of the NPPF and the CIL 122 Regulations. Please let me know if you require any further supporting information.

I would be grateful if this consultation response is reported to the Development Control Committee.

Yours sincerely,



Neil McManus
Planning Obligations Manager

cc Iain Maxwell, Suffolk County Council
 Peter Black, Suffolk County Council
 Dave Watson, Suffolk County Council
 Jeff Horner, Suffolk County Council



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

AW Reference: 1404/SP57(003)
Local Planning Authority: Mid Suffolk District Council
Site: Grampian Country Foods, ELMSWELL
Proposal: Demolition of all buildings on site and erection of
up to 190 residential dwellings and a pumping
station
Planning Application: 0846 / 13

Prepared by Carly Summers

Date 01 May 2013

If you would like to discuss any of the points in this document please contact me
on 01733 414619 or email planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 2.1 The foul drainage from this development is in the catchment of Elmswell STW that at present has available capacity for these flows.

Section 3 – Foul Sewerage Network

- 3.1 The proposed development of 190 dwellings will lead to an unacceptable risk of flooding and pollution downstream. A foul drainage strategy will need to be prepared in consultation with Anglian Water. The drainage strategy should encompass proposed connection points and mitigation measures.

We will request a condition requiring the drainage strategy covering the issue(s) to be agreed.

Section 4 – Surface Water Disposal

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application is not relevant to Anglian Water and therefore this is outside our jurisdiction for comment and the Planning Authority will need to consider which the appropriate body to comment is.

We request that the agreed strategy is conditioned in the planning approval.

Section 5 – Trade Effluent

- 5.1 Not applicable

Section 6 – Suggested Planning Conditions

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

Foul Sewerage Network (Section 3)

CONDITION

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

accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

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Date: 7 May 2013
Our ref: 84412
Your ref: 0846/13



Peter Goodyear
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

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

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Goodyear

Planning consultation: Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application).

Location: Former Grampian Harris, St Edmunds Drive, Elmswell

Thank you for your consultation dated and received on 17 April 2013.

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.

This proposal does not appear to affect any statutorily protected sites or landscapes, or have significant impacts on the conservation of soils, nor is the proposal EIA development. It appears that Natural England has been consulted on this proposal to offer advice on the impact on a protected species.

Natural England's advice is as follows:

We have adopted national standing advice for protected species. As standing advice, it is a material consideration in the determination of the proposed development in this application in the same way as any individual response received from Natural England following consultation and should therefore be fully considered before a formal decision on the planning application is made.

The protected species survey has identified that the following European protected species may be affected by this application: Bats and Great crested newts.

Our standing advice sheets for individual species provide advice to planners on deciding if there is a 'reasonable likelihood' of these species being present. They also provide advice on survey and mitigation requirements.

The standing advice has been designed to enable planning officers to assess protected species surveys and mitigation strategies without needing to consult us on each individual application. The standing advice was issued in February 2011 and we recognise that it will take a little while for planners to become more comfortable with using it and so in the short-term will consider species surveys that affect European protected species against the standing advice ourselves, when asked for support by planners.

We have not assessed the survey for badgers, barn owls and breeding birds¹, water voles, widespread reptiles or white-clawed crayfish. These are all species protected by domestic legislation and you should use our standing advice to assess the impact on these species.

How we used our standing advice to assess this survey and mitigation strategy

We used the flowchart on page 10 of our Standing Advice Species Sheet: Bats beginning at box (i). Working through the flowchart we reached Box (XIV) Prior to the commencement of any works which may affect bats or their roost, a detailed mitigation and monitoring strategy should be submitted to, and approved in writing by the local planning authority. All works should then proceed in accordance with the approved strategy with any amendments agreed in writing.

We used the flowchart on page 8 of our Standing Advice Species Sheet: Great crested newts beginning at box (i). Working through the flowchart we reached Box (X) We advise that further clarification on the impacts this application may have upon great crested newts, is required in accordance with the Great crested newt mitigation guidelines, with further information to be requested from the applicant before determination of the application.

For future applications, or if further survey information is supplied, you should use our standing advice to decide if there is a 'reasonable likelihood' of protected species being present and whether survey and mitigation requirements have been met.

If you would like any advice or guidance on how to use our standing advice, or how we used the standing advice to reach a conclusion in this case, please contact us on the number above.

Yours sincerely

Annmarie Williams
Customer Service Consultation Team

¹ Unless protected by Schedule 1 of the Wildlife & Countryside Act 1981 (as amended).

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

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Natural Environment Team
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Mr P Goodyear
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk IP6 8DL

Your Ref: 0846/13
Our Ref: Landscape/MSDC/Elmswell
Date: 8th May 2013

Dear Peter,

Proposal: Outline planning application for demolition of all buildings on site (comprising redundant factory buildings in Use Class B2, settlement tanks and 6 derelict residential properties) and erection of up to 190 residential dwellings and pumping station. Construction of a new access road to Station Road. (Appearance, landscaping, layout and scale to be the subject of a future reserved matters application)

Location: Former Grampian Harris, St Edmunds Drive, Elmswell

Application Number: 0846/13

Based on the information provided on the MSDC web site and a site visit (public areas only) carried out on 24th April 2013, I offer the following comments on this application.

I have referred to the Design and Access Statement as the D/A and the Indicative Master plan as the IMP.

The application is in Outline form with the IMP providing an indication of the form of the proposed development of 190 dwellings. The access point to the site is shown but all other matters are reserved. The proposals also include reference to a village relief road but this is not part of the application.

I understand there is likely to be an overall policy objection to the development of this site due to local plan policies and the employment designation of the site. The use of the whole site for housing would appear to prevent any future expansion of the existing employment site. This could be needed to allow existing business' to expand and to serve an increasing population at Elmswell.

In the event that housing is supported on all or part of the Grampian site the following comments offer guidance on landscape design matters. Other officers are likely to address some of these matters where there is an overlap in interest.

LANDSCAPE IMPACT

There will be a significant impact on the wider landscape and character of the settlement of Elmswell from a development of this size and scale. The site lies on the edge of the village where the countryside is open, relatively level and has a strong agricultural character. There are no other estate scale housing areas within this part of the village. The character is of older scattered houses, farmhouses and some small groups/rows such as the adjacent bungalows.

The former Grampian Harris food/meat processing facility buildings have an impact on the setting of the village but they are set well back from residential properties and do not appear to overly oppress these existing dwellings.

The existing buildings, in their semi derelict state create an eyesore from some closer vantage points particularly the public footpaths close and adjacent to the site. However the significant amount of space and landscape around the large buildings, along with their subdued colours mitigates their wider landscape impact to a large degree.

The visual benefits afforded by the removal of the derelict buildings and associated infrastructure is likely to be outweighed by an inappropriate scale of development unless this contributes significantly to the character of the village and provides substantial community benefits.

The site also has strong employment associations with the village with meat processing activities being operational for some 100 years. The current scheme does not appear to reflect any elements of this historical employment use.

At present lighting after darkness is likely to be at a minimal level (possible security lights). Lighting associated with new housing and roads will result in a large degree of change and impact on the wider landscape and properties with views over the site. No landscape buffer or mitigation has been indicated in the IMP to offset light spillage into the countryside.

The historic map progression provided in the D/A page 7 and 8 shows how development to the north of the railway line traditionally incorporated various gaps and spaces along the frontage to Station Road. Historically the scale of development fronting the street has been on a smaller scale. More recent developments off Blackbourne Road and Blacksmiths Way have created estates on a smaller scale and have also 'filled' some of the gaps and spaces that once existed along the road frontage.

Some of these spaces still exist with one being at the current site entrance to Grampian Harris. These are crucially important in helping to ensure that the village retains some breaks in the built frontage giving relief and views of green space and in some cases views out to the countryside beyond.

See later section 'Frontage to Station Road'.

The IMP presented with the application shows a uniform approach to the development across the site with the exception of the central green space. This design approach is likely to create a sense of a new estate without the variations and changes to character that could be provided by a more varied approach to the design and scale of housing. In this respect the layout will be somewhat out of character with the village and surrounding landscape.

VISUAL IMPACT AND LANDSCAPE CHARACTER

There are clear views of the site from the north and north west from public rights of way. The site is elevated above the small valley, located to the north, by some ten metres maximum (60m lower and 70m upper) enabling views of the buildings to be viewed from the footpath. Residential properties are proposed to be sited closer to the site boundary than the current factory buildings. Storey heights are not currently indicated but it is possible that these could be up to three storey. At present three-storey housing in Elmswell is clustered around the station close to the heart of the village where closer densities may be expected. The location of any three-storey units (flats or houses) on this site will need to be carefully planned with adequate space around them to provide a sense of space and suitable scale.

The IMP does not show any boundary landscape mitigation. This could be partly due to the unknown matter of a relief road, the possible route of which has been indicated on the IMP. However with or without this road the development should be accompanied by suitable perimeter planting to ensure that a new village edge is designed to incorporate landscape. This will be needed to soften and partially / wholly screen the development from the wider landscape.

The development provides scope to create a significant new landscape edge to the settlement with community green space being provided at the same time. Provision of a natural green space in the form of community woodland would help to provide enhancement and a buffer to the farmed landscape, paddocks and properties to the north.

FRONTAGE TO STATION ROAD

The D/A page 42 states that two detached dwellings on the road frontage will create a gateway entrance to the development. However this space creates character and allows views to the countryside beyond. The space characterises the form of the street with its gaps defining different phases of and age of development. Such gaps and spaces help to prevent a feeling of continuous development and suburban spread.

A veteran/ mature ash tree (with decay) sits within the space. Along with the willow growing (beyond the site) around a dry pond to the north the trees lend a more rural character, separation and variety to the street scene.

The submitted tree survey states that the ash should be retained as an 'eco' tree (clearly the need to make it safe is necessary) with further planting to ensure long term replacement. This space could become a small village green ensuring a sense of place is created on Station Road. This will become increasingly important if the access becomes the relief road.

The space with trees will help define the development entrance and could be in keeping with the character of other treed spaces along the street south of the railway line.

I would recommend that this space remains open so an element of open/green landscape can be retained.

PROPOSED RELIEF ROAD

The proposal for a relief road is at early stage, no doubt comments have been or will be provided by SCC planning and highway officers. If it is decided that such a road is needed to support the development of this land then the implications for the landscape are significant.

Along with the relief road the wider vision outlined in the D/A page 39 states that additional areas of housing (B and C) could be provided. The text also states that this could help to provide a larger

area of open space for the community but it is not clear where this will be located or in what form it will be. Area B is within the 'blue line' but not within the application red line area.

An indicative route for a proposed bypass is shown in the D/A Figure 22 page 23. This shows the route emerging very close to the church and almshouses and near to the allotments and cemetery. This route will need to be carefully assessed and other options for a less intrusive route considered.

The route indicated for a relief road will have an impact on certain features and property as follows:

- ❖ The setting of Elmswell St John the Divine church, a Grade 2* listed building.
- ❖ The setting of the almshouses.
- ❖ The setting of Elmswell Hall Grade 2 listed building.
- ❖ The properties alongside the existing lane north of the church.
- ❖ The sloping valley side north of the church.
- ❖ The habitat value of the 'blue land', in particular the indicative route passes close to pond OS3 described in the habitat report and highlighted in the D/A.

The relief road will separate the land (within the blue line) to the north of the proposed development land potentially making this land less beneficial and accessible as natural green space. Links by way of safe road crossings would need to be accommodated.

Any proposals for a relief road will need to be accompanied by a suitable assessment, design and landscape mitigation. Landscape will be required on both sides of the road, giving softening and screening to new development and a landscape buffer to the wider countryside.

TREE REPORT OAKFIELD MAY 2012

The tree report is fairly comprehensive but has not positively fed into the design approach shown for the development in the IMP. The D/A refers to the need to protect trees and the General Design principles outlined on page 49 are sound. However the successful translation of these principles into the IMP is not apparent.

There are several groups and individual trees that are worthy of retention and these should form the basis of further planting and green space areas. Broadly these are the groups of trees in the areas along the boundary footpath around the trees numbered as T1, T17, T33. These trees appear to be the more historic tree groups and comprise species such as ash, beech, lime and sycamore.

There are some single trees scattered through the site with value in particular the copper beech T28 and the Weeping willow T27. I would class the latter as a 'B' category tree with a higher value than stated. Both trees are visible beyond the site boundary and should be retained.

Other smaller trees have more limited value and some will decline without positive management e.g. T26 horse chestnut is now partially collapsed.

There is scope to enhance the landscape and tree planting throughout the site. In particular some of the boundary conifer hedges should be removed and replaced with more appropriate planting. The latter will dominate new homes and create long-term management issues. The removal of the conifer hedge along the south boundary with the railway line will allow the natural boundary hedging to thrive. Although this hedge line is widely visible and removal would open up views of the site other species of hedge would be more sustainable in the long-term

Planting to mitigate against the noise impact of the adjacent industrial land uses and the railway (with its increasing freight traffic) should be provided beyond private garden areas. Other measures may also need to be provided such as mounding and/or fencing.

OPEN SPACE PROVISION

The MSDC SPD titled Supplementary Planning Document for Social Infrastructure Including Open Space, Sport and Recreation requires certain standards of open space provision to be provided on housing developments.

The SPD states that the standard for local play areas is 0.2 hectares per 1,000 population, and should comprise TOPS, JOPS and YOPS. Depending on the provision of facilities within the village and the accessibility of existing sites it would seem that the Grampian Harris site should largely make provision for play on site.

The IMP shows one area, 2150 sq m/0.2 hectares of open space, set within the housing area and accessed by roadways. This space is referred to as a central 'village green', or pocket green at the heart of the development. This is welcome and is likely to primarily serve the residents of the development itself due to its location within the new homes.

The space will need to specifically provide for TOPS (toddlers), JOPS (Juniors) and possibly YOPS (youth) with sufficient buffer zones and safe access. There is likely to be a need for open space to NEAP standard i.e. with kickabout space to be provided. This may depend on whether an area of natural green space can be provided and provision elsewhere in the village.

Natural green space and allotment land are also important uses that should be accommodated within or adjacent to the development. If sufficient space exists within the village and is safely accessible then offsite provision may be acceptable.

The central space will not be of sufficient size to provide for all elements of green space needed. Additional green spaces will be needed to allow for wider play provision, natural green space, tree retention, footpath spaces, open space on the street frontage, and wider landscape mitigation.

PUBLIC RIGHTS OF WAY AND VISUAL AMENITY

There could be some benefits in diverting the existing footpath away from the site's south and east boundaries where the path is currently sandwiched between fences and is not an attractive route.

However there are also benefits in retaining and improving this perimeter route as there is the potential to incorporate attractive spaces where significant trees exist. The retention of boundary trees is an aspiration stated in the D/A Page 34, para 4.3.

However the practicality of retention of these boundary trees is unclear especially as the IMP shows gardens or parking courts backing onto all the developed site boundaries. These uses are not compatible with large mature tree retention.

There are two particular areas where the IMP shows parking courtyards (IMP key 4). These are both located on existing rights of way. One space is located next to the railway line in the southeast corner of the site. Here large beech, sycamore, holly and lime create an attractive feature next to the railway line. These trees, although requiring some safety management work should be largely retained, supplemented and kept within public space. Retention and enhancement of the existing footpath route could enable this to happen.

A second space where trees and green space provide an attractive setting to an older cottage is to the rear of Walnut Tree Cottage on Station Road. Here mixed trees, some sycamore and

hawthorn provide an attractive albeit neglected space but could provide a good incidental green space, again located on a public right of way.

Retention of these small green spaces will help improve the visual amenity afforded to existing residents who border directly onto the site area.

The proposal to divert the footpath alongside estate roads as shown on the IMP creates an urban route. A route taking in incidental green space, open spaces/village green would provide a more attractive experience for the walker especially for those linking into other wider routes.

Links to footpaths to the north out to Harding's Farm and west to Elmswell New Hall would be beneficial. There will be a need to design walking routes that will link to existing paths with provision for crossing a relief road if built in the future. Cycle routes may also need to be considered with more direct links provided to the village and possibly to the employment site, station and other villages to the north.

THE 'BLUE' LAND BEYOND THE APPLICATION SITE BOUNDARY

There appears to be no specific proposals for this land, currently described as Greenfield and partly occupied by former settlement lagoons. The wider vision shows the land occupied by settlement lagoons as 'B' and indicated for possible future development.

The land to the north forms an attractive area of rough grass and thick boundary blackthorn hedges. These hedges lend an element of wider landscape screening due to their unmanaged natural state. Habitat value will also be high especially as accompanying ditches exist along most of the field boundaries.

The land falls to the north with a fall of 8.5 metres as stated in the D/A page 30. There are drainage ditches and a pond OS3 within the 'greenfield' and shown as an area with ecological value in the D/A.

The proposed relief road cuts through this land potentially inhibiting its value as open space serving the development. However there is scope as stated earlier for use of the land as natural green space possibly in the form of community woodland.

The west boundary of the 'blue land' is highlighted by a very visible row of lombardy poplars. These trees could form the basis of a new planting belt to screen the housing development from views from the west and southwest. The use of this land (Area B) for housing although not part of the current application would appear to be unsuitable in terms of its past use and high visibility in the wider countryside.

RECOMMENDATION

I recommend that if the proposed use of the former Grampian Harris land for housing is supported then the following matters need to be further considered with negotiation relating to further detail and provision for green space and landscape. If/when approved the Outline application can be suitably controlled by reserved matters with aspects of landscape and open space provision and long-term management also controlled by legal agreement/s.

Matters to negotiate further and prior to consent include:

- ❖ Open space provision to include natural green space, provision for TOPS, JOPS, YOPS.
- ❖ Clarification on the use of the 'blue land'.
- ❖ Allotment provision.
- ❖ Footpath and possible cycle links through and beyond the site.

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- ❖ Green space links to the wider countryside.
- ❖ Landscape mitigation and creation of a new village edge.
- ❖ Tree retention and new planting principles.
- ❖ Station Road frontage treatment and retention of open land to create a long-term green space.

Outline consent should require the submission of a **suitable master plan** and **design code** to cover both urban and landscape design matters.

Alongside the application is the consideration of the need for a relief road. The road and route, landscape and visual impact, design and landscape mitigation are matters that will need further detailed consideration.

Please let me know if you need clarification on any matters I have raised or input into negotiations with the planning agents or landscape consultants.

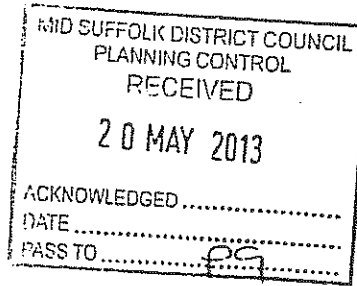
Yours sincerely

Anne Westover BA Dip LA CMLI
Landscape Planning Officer

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0846113

17 May 2013
CAPL/32240/A3/GH/MW



savills

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Dear Sir

OUTLINE PLANNING APPLICATION FOR DEMOLITION OF ALL BUILDINGS ON SITE (COMPRISING REDUNDANT FACTORY BUILDINGS IN USE CLASS B2, SETTLEMENT TANKS AND 6 DERELICT RESIDENTIAL PROPERTIES) AND ERECTION OF UP TO 190 RESIDENTIAL DWELLINGS AND PUMPING STATION. CONSTRUCTION OF A NEW ACCESS ROAD TO STATION ROAD. (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE TO BE THE SUBJECT OF A FUTURE RESERVED MATTERS APPLICATION) - LAND AT THE FORMER GRAMPIAN HARRIS SITE, ST EDMUNDS DRIVE, ELMSWELL (APPLICATION REFERENCE 0846/13)

Savills (UK) Ltd has been instructed to make comments to the above planning application submitted by Harrow Estates on the Bacon Factory site in Elmswell. Savills act for landowners on the eastern side of Ashfield Road and welcome the opportunity to make representations to this application.

Our comments follow representations we made to the public consultation on the Bacon Factory site held in July 2012 and our recent attendance at the Annual Parish Council Meeting on the 15 May 2013 where the development proposals were discussed.

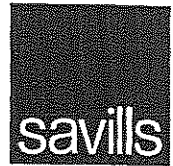
Our first issue to acknowledge is that the Bacon Factory site is previously developed in planning terms and as a site within the existing settlement envelope of Elmswell it is generally accepted that the Council as a Local Planning Authority should consider this site positively in light of National Planning Policy Framework (NPPF) guidance where the "golden thread" of sustainable development runs through its contents.

The second issue relating to the development proposals is of course the contribution, or not, of this site to any relief road for the settlement. In this context we note Harrow Estate's Design and Access Statement which points out on page 23 that:

"There is currently no policy justification for a relief road in the Adopted Local Plan, Core Strategy or Local Transport Plan. However development on this site could be a catalyst for its delivery."

The issue of the relief road is of course a long running saga for the village but it is clear that the increase in residential development in Elmswell as well as the anticipated use of the railway line and the consequent closures during the day causing queuing and congestion and resultant safety concerns are such that a new relief road continues to be high on the agenda.

The debate and discussion at the Annual Parish Meeting confirms this position in our view. To that end, we would support proposals within Harrow Estate's application to make provision for the first "stub" of the relief road whilst fully appreciating the need for the rest of the relief road to come forward as a result of an agreement of other relevant landowners working in conjunction with other stakeholders.



Not to include provision for a relief road and effectively close off its future provision in our view is an opportunity lost since once the physical alignment is closed off, it will be very unlikely indeed that a relief road can ever be delivered on that side of the Village.

We fully accept that there are costs associated with any new relief road and that it is highly likely that new commensurate residential development will need to come forward where legal agreements will require payments into a "collecting pot" to fund any new road.

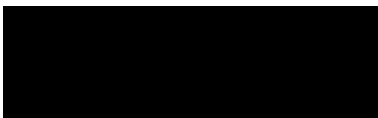
Our clients east of Ashfield Road continue to promote residential development and associated community benefits (e.g. new primary school, new doctor's surgery and recreation extensions) on land north of Blackbourne Meadow Playing Field. We have continued to make the necessary and relevant representations over the years to the Local Development Framework process and held a public meeting in Elmswell concerning our site back in early 2012.

Our client's land east of Ashfield Road could bring forward some 150 dwellings on a 10 acre site and therefore the site, if approved, could provide funding for the bypass in the event that viability issues are satisfactorily addressed whilst at the same time offering the village an enhancement of its existing services and facilities.

In summary, we support the need for a relief road in Elmswell and the opportunity that this planning application submitted by Harrow Estates makes for its future. In supporting such an approach, the District Council as Local Planning Authority will also need to accept that further development in the village will have to come forward and consequently our client's land east of Ashfield Road presents such an opportunity.

We look forward to being kept informed of progress of the Harrow Estates application.

Yours faithfully



Garth Hanlon BSc (Hons) MRTPI
Director

cc. Peter Dow (Elmswell Parish Council)

Comments on Former Grampian Foods Site Transport Assessment

Background Information/Baseline Travel Information

Whilst the site is a former bacon factory, Grampian Foods ceased trading at the site in 2006. Since then, traffic to and from the site has been negligible.

Station Road is subject to a 30 mph limit, however this is regularly exceeded as evidenced by the ATC. The 85th percentile figure should be less than 30 mph for this value to be used in an assessment.

Station Road is 7 m wide to cater for the wide loads that H.C. Wilson Transport Ltd. specialise in. Other businesses that currently use Station Road and require articulated vehicle movements are Hudson Haulage and Groupbridge Civil Engineering.

Whilst the site can theoretically be brought back into B2 use immediately, without the need for planning permission, there is no current commercial demand. Any alterations to buildings or structures to make them suitable for alternative tenants would need planning permission(s). Trip generation from this use cannot be considered as part of the baseline but should, if necessary, be considered as an alternative use.

The Ashfield Road ATC shows:

- A mean southbound AM peak hour flow of 159 vehicles between Monday and Friday.
- A mean northbound PM peak hour flow of 189 vehicles between Monday and Friday.

Development Proposals/Trip generation

It is accepted that this is an outline application for 190 residential dwellings and therefore the development proposals are not fixed.

It is accepted that the trip rates should be calculated using the local data gathered from the existing Blackbourne Road development. However, the total number of two way trips does not equal the sum of the arrivals and departures. Additionally, this data was gathered in 2008. Using TEMPRO, a figure of 1.0267 in the AM peak hour and 1.0352 in the PM peak hour should be applied to these values to bring them up to 2013.

Residential (171 Units)	AM Peak Hour			PM Peak Hour		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Trips 2008	34	89	123	130	53	183
Trips 2013	35	92	127	135	55	190
Trip Rate	0.205	0.538	0.743	0.789	0.322	1.111

Applying these trip rates to the proposed 190 units implies the following number of trips.

Residential (190 Units)	AM Peak Hour			PM Peak Hour		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Trips Rate	0.205	0.538	0.743	0.789	0.322	1.111
Trips 2014	39	102	141	150	61	211

The trips that should be factored into the junction / level crossing / road capacity assessments should be based on a "plus 5" scenario which is the 2013 trips factored by a TEMPRO rate of 1.0307 in the AM peak hour and 1.0357 in the PM peak hour. The trips on Station Road / Ashfield Road are as follows:

	AM Peak Hour			PM Peak Hour		
	northbound	southbound	Total	northbound	southbound	Total
Trips 2013	127	159	286	189	141	330
Trips 2014	166	261	427	339	202	541
Trips 2019	171	269	440	351	209	560
Increase in Trips	+35%	+69%	+54%	+85%	+48%	+69%

These figures are significantly more than those proposed in the TA submitted on behalf of Harrow Estates.

Impact

The level crossing was surveyed on Tuesday 19th June 2012. Assuming each vehicle queuing takes up 6m of road space, the potential lengths of the queues in either direction are:

Queues	AM Peak Hour			PM Peak Hour		
	northbound	southbound		northbound	southbound	
No. Vehicles Queuing 2012	20	21		44	42	
Potential Increase	+35%	+69%		+85%	+48%	
No. Vehicles Queuing 2019	27	36		82	63	
Distance (m)	162	216		492	378	

In the 2019 PM peak hour, this takes queuing traffic in the southbound direction along Station Road / Ashfield Road past the proposed access. In the northbound direction, queuing traffic will regularly be down both School Road and New Road/Station Road.

Conclusion

I am of the opinion that this level of queuing is unsatisfactory, not just the impact to residents but also to the commercial premises in the area. The Harrow Estates TA makes mention to on street parking in the vicinity of the level crossing, this is not always the case as is evidenced by a quick search on Google Streetview (which also shows the current level of northbound queuing at the level crossing). Parking along Station Road / Ashfield Road acts as traffic calming measures (which are required on the evidence of the ATC speed counts). Any further waiting restrictions proposed on Station Road / Ashfield Road will have a commercial impact on the Mace shop, new Butchers and hair salon.

Obviously, if SCC and MSDC currently have aspirations for a relief road to alleviate the bottleneck caused by the level crossing, and further development is only going to adversely impact upon the bottleneck. Whilst smaller developments could potentially be accommodated without justifying improvement to the local highway network, 190 residential dwellings is a substantial development and will impact on the local community.

Joshua Brown, M.Eng (Hons)



Property Services

Peter Goodyear
Planning Services
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131 High Street
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Rushbrook House
Paper Mill Lane
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25th April 2013

Dear Mr Goodyear

Planning Application for Residential Development (190 Dwellings) at the Former Grampian Harris Site, St Edmunds Drive, Elmswell (Reference 0846/13) – Consultation Response of NHS Property Services Ltd: Suffolk

I refer to your consultation on the above planning application, dated 18th April 2013, and advise that following a review of the applicant's submission, including the Planning Statement, NHS Property Services Ltd: Suffolk wishes to raise a 'Holding Objection' to the application for the reasons outlined below.

Please note that NHS Property Services Ltd: Suffolk was formerly NHS Suffolk, which ceased operating on 31st March 2013.

The proposal is for a residential development comprising 190 dwellings, which is likely to have a significant impact on the NHS funding programme for the delivery of healthcare provision within the local area and specifically within the health catchment area of the development. The NHS would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through a Section 106 planning obligation.

Review of Planning Application

The applicant identifies in the Planning Statement that "*the site has good access to primary health care facilities in either Bury St Edmunds or the nearby village of Woolpit*" (paragraph 2.3). However, the application does not include a Healthcare Impact Assessment (HIA) or propose any mitigation of the healthcare impacts arising from the proposed development.

In the absence of an assessment of healthcare impact and proposed mitigation by the applicant, an HIA has been prepared by the NHS to provide the basis for a developer contribution towards capital funding to increase capacity within the GP catchment area.

Healthcare Impact Assessment

The Capital Funding Implications of the Proposed Development

The HIA methodology for assessing the healthcare impacts arising from the proposed development includes a capacity calculation for the GP Practices within a 2km catchment of the application site. This is considered to be a reasonable distance to travel to access such services, in line with policy and guidance, which encourages the protection and promotion of local services that are within easy walking distance of housing, replacing short car trips where possible.

However, in this instance, there are no surgeries within this catchment. Therefore, the HIA is based on the nearest GP surgery to the proposed development site.

Table 1 provides a summary of the capacity position for the nearest GP Practice once the additional staffing and floorspace requirements arising from the development proposal are factored in, including an estimate of the costs for providing new floorspace. The costs for additional car parking capacity are not addressed in the table, as the NHS has yet to undertake a detailed audit of the transportation position.

A GP Catchment Plan to identify the location of the GP Practice serving the development proposal is *attached* to this letter.

Table 1: Capital Cost Calculation for the Provision of Additional Health Services Arising From the Development Proposal & Developer Contribution

Premises	List Size (01.01.13)	No. GPs (WTE)	Capacity ¹	Spare Capacity ²	Additional Population Growth (190 homes) ³	Additional GPs Required to Meet Growth ⁴	Additional Floorspace Required to Meet Growth ⁵	Capital Required to Create Additional Floorspace ⁶
Woolpit Health Centre, Heath Rd, IP30 9QU	13,368	7.3	13,140	-228	456	0.25	32.5	£65,000
Total	13,368	7.3	12,140	-228	456	0.25	32.5	£65,000

Notes:

1. Based on optimum list size of 1,800 patients per GP.
2. Based on list size as at 1st January 2013.
3. Based on Census 2011 Table "Rooms, bedrooms and central heating, local authorities in England and Wales".
4. Additional growth divided by optimum list size.
5. Based on 130m² floorspace per GP x additional GPs required to meet growth.
6. Based on standard m² cost multiplier for primary healthcare facilities in the East Anglia Region from the BCIS Q1 2013 Price Index, adjusted for professional fees, fit out and contingency budget (£2,000/ m²), rounded to nearest £.

As shown in Table 1 there is a capacity deficit in the nearest GP surgery and a developer contribution of **£65,000** is required to mitigate the 'capital cost' to the NHS for the provision of additional healthcare services arising directly as a result of the development proposals.

The NHS therefore requests that this sum be secured through a planning obligation linked to any grant of planning permission in the form of a Section 106 Agreement.

Developer Contribution Required to Meet the Cost of Additional Capital Funding for Health Service Provision Arising

In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework (NPPF) and the CIL Regulations, which provide for developer contributions to be secured to mitigate a development's impact, a financial contribution of £65,000 is required, which would be payable prior to occupation of the development. This would be used to build further capacity into the catchment surgery.

The NHS is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF and Section 122 of the CIL Regulations, which require the obligation to be a) necessary to make the development



Property Services

acceptable in planning terms, b) directly related to the development, and c) fairly and reasonably related in scale and kind to the development.

Conclusion

In conclusion, the NHS raises a 'holding objection' on the ground that the applicant has not assessed the likely healthcare impacts of the development or provided for appropriate mitigation of those impacts.

On this basis, the application is considered to conflict with the provisions of the Development Plan, which seek to achieve sustainable development and provide for the necessary physical and social infrastructure (and funding) to support residential led development. Specifically, it is considered to be inconsistent with Objective SO5 and Policy CS6 of the Mid Suffolk Core Strategy (2008).

The application is also considered to conflict with the intentions and objectives of national guidance set out in the NPPF (with its presumption on favour of sustainable development). Specifically, it is considered to be inconsistent with paragraphs 17, 69, 70, 156, 162 and 196 of the NPPF.

Notwithstanding the above, the NHS would be content to lift its objection in the event that an appropriate level of mitigation is proposed by the applicant and secured through a Section 106 Agreement. In this respect, it is considered that a developer contribution of £65,000 would fairly and reasonably address the identified healthcare impacts.

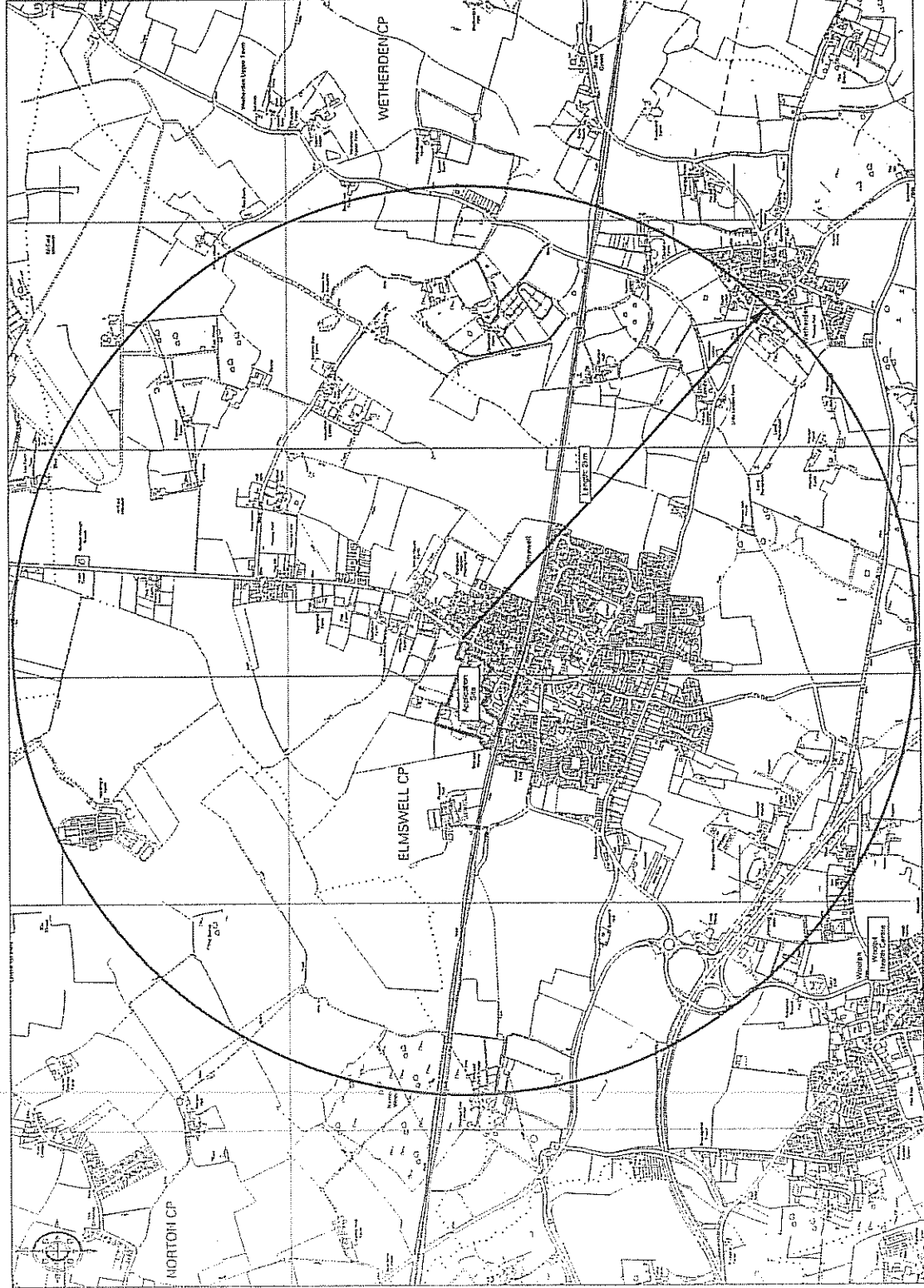
The NHS looks forward to working with the applicant and District Council to satisfactorily address the issues raised in this letter and would appreciate acknowledgment of its safe receipt.

Yours sincerely

For and on behalf of:

Mark Marshall
Head of Corporate Development and Infrastructure

Proposed Residential Development of Former Grampian Harris Site, Elmswell (Application Ref: 0846/13)
Consultation Response of NHS Property Services Ltd: Suffolk
GP Catchment Area Plan (April 2013)



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