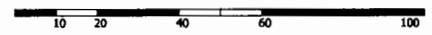
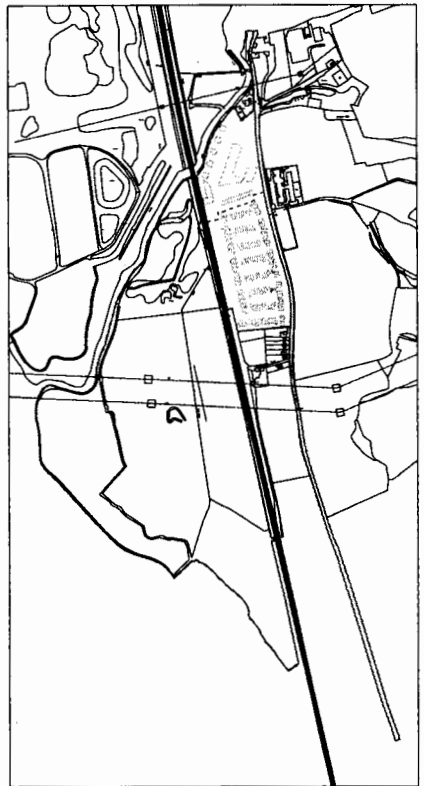


The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
	08/05/14	PM	PJ



Note: The layout of the houses in the south residential area are illustrative.

### Key

- South Residential Area 44.5 dph
- Outline Application Boundary

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Figure 4.4.1 Outline Application Parameter Plan  
 Residential Density**

Date	Scale	Drawn by	Check by
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Project No	Drawing No	Revision	
18449	4.4.1	B	

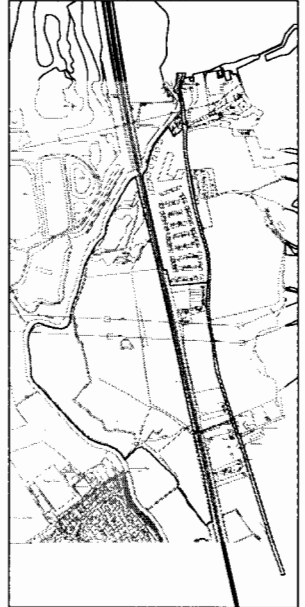
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Revision	Date	Dm	Clad
A	06/06/12	RP	PJ
B	20/06/12	PM	PJ
C	13/07/12	PM	PJ
D	23/07/12	PM	MC
E	13/08/12	PM	MC
F	12/04/13	PM	PJ
G	09/05/14	PM	PJ



10 20 40 60 80 100

Note: The layout of the houses in the south residential area are illustrative.

**Key**

- Residential
- Commercial
  - Ground Floor
    - Office Units
    - Workshops
    - Workshop & Retail
    - Servery
    - Kitchen
    - Store
    - Reception
  - First Floor
    - B1 Units
    - Break-out Space
  - Second Floor
    - B1 Units
  - Third Floor
    - B1 Units
  - Fourth Floor
    - Unfused Area
- Commercial + Residential above GF
- Energy Centre on Ground Floor
- Toddlers Outdoor playspace TOPS
- Public Space
- Parking
  - Permeable parking Bays/
  - Impermeable Access Roads
- Soft Landscape
- Open Space
- Allotments
- Primary route
- Secondary roads
- Link to path
- Improvements to existing footpaths
- New Footpath on site
- Existing Footpath outside site
- Existing Footpath and Bridges on site
- Drainage Strategy**
  - Underdrained Grassed Road-Side Swale
  - Lined Grassed Swale
  - Fenced Area around Lagoons
  - Grassed Attenuation Basin
  - Wetland Area
  - Restored Ditch
  - Foul Water Pumping Station
  - Application Site Boundary

Project  
Old Fisons Site, Paper Mill Lane  
Bramford, Ipswich

Drawing Title  
Figure 4.1 EIA Parameter Plan  
Land Use

Date	Scale	Drawn by	Check by
15.02.12	1:2000 @ A2	PM	PJ
Project No	Drawing No	Revision	
18449	4.1	G	

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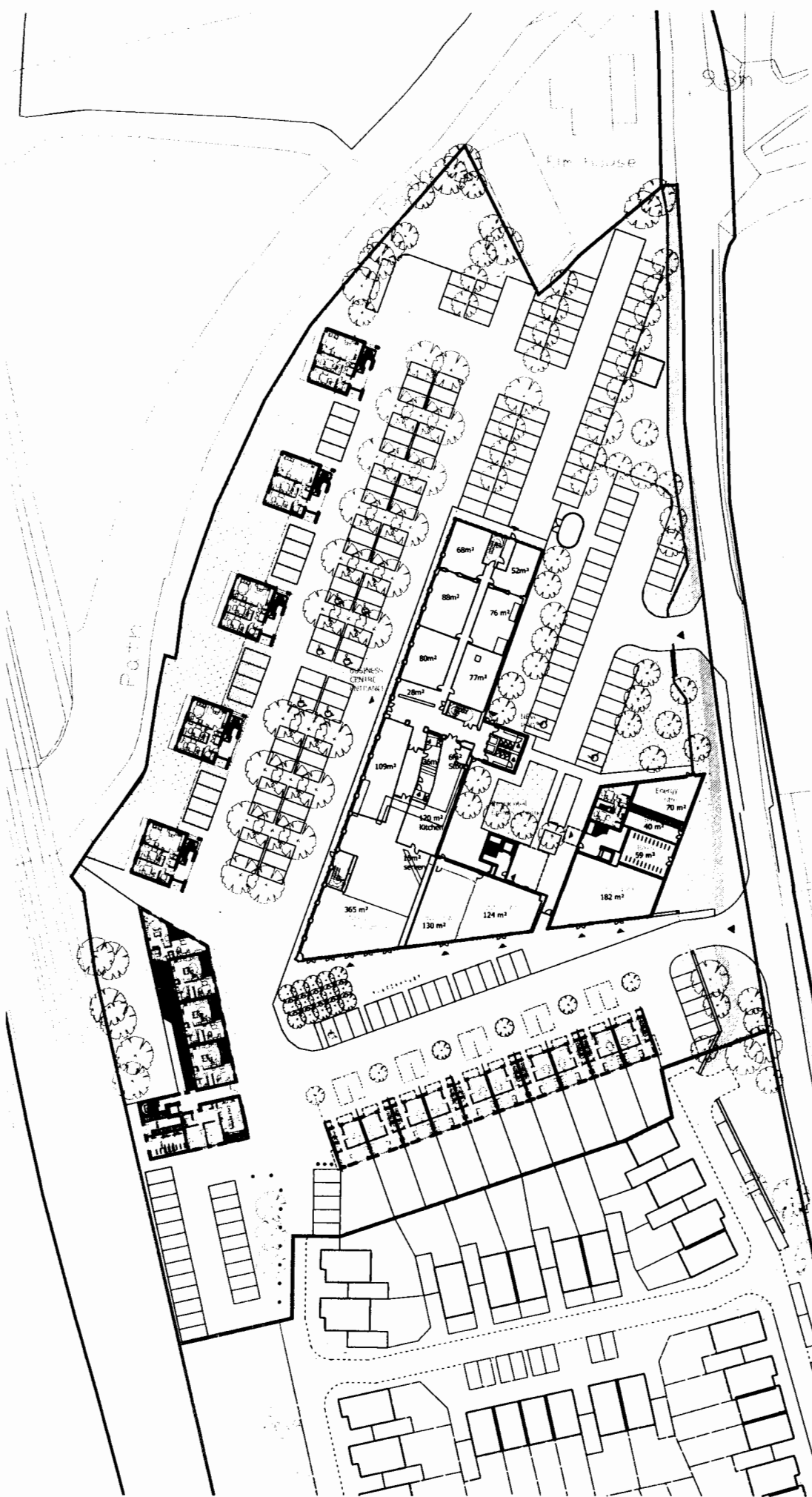
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Revision	Date	Drn	Chd
A	25/07/12	PM	PJ
B	23/08/12	AB	PJ
C	15.02.13	PM	PJ
D	09.05.13	PM	PJ
E	05.06.13	PM	PJ
F	30.08.13	JF	PJ



Surface Treatment Key

[Pattern]	Shared Surface
[Pattern]	Pedestrian Priority
[Pattern]	Curtilage of houses
[Pattern]	Soft Landscape



Note: The layout of the houses in the south residential area are illustrative.

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**  
 Drawing Title  
**Site Plan- Ground Floor**

Date	Scale	Drawn by	Check by
26.04.12	1:500 @A2	PM	PJ
Project No	Drawing No	Revision	
18449	1010	F	

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Revision	Date	Dm	Ckd
A	23.08.12	AB	PJ
B	23/08/12	PM	PJ
C	16/05/13	PM	PJ
D			
Amendments annotated for Reference			
	05.06.13	PM	PJ
E	30.08.13	JF	PJ
Amendments for RE - Submission			



Site Section A



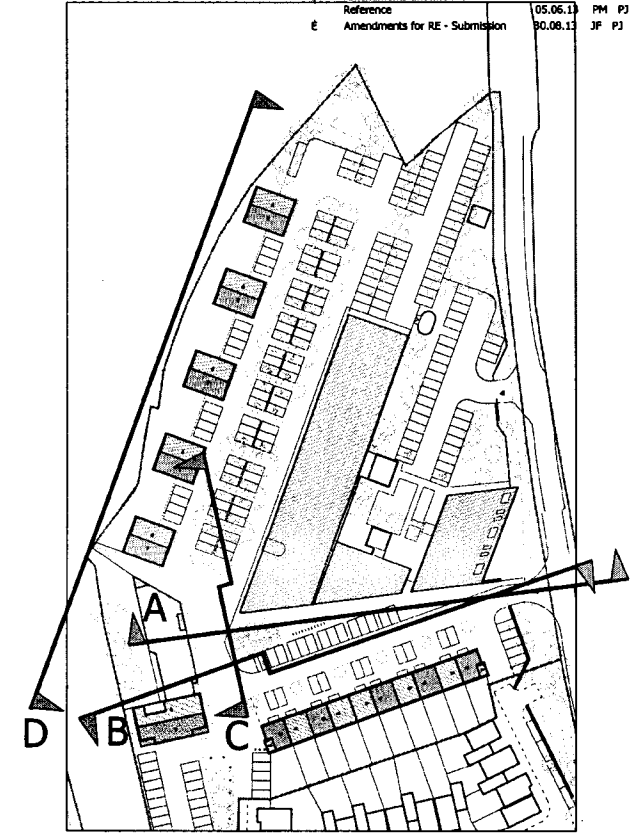
Site Section B



Site Section C



Site Section D



1/1000

130

Project  
**Old Fisons Site, Paper Mill Lane**  
**Bramford, Ipswich**  
 Drawing Title  
**Site Sections**

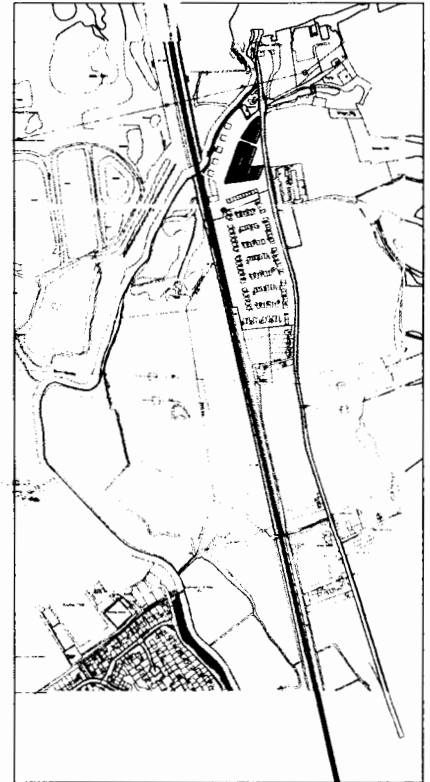
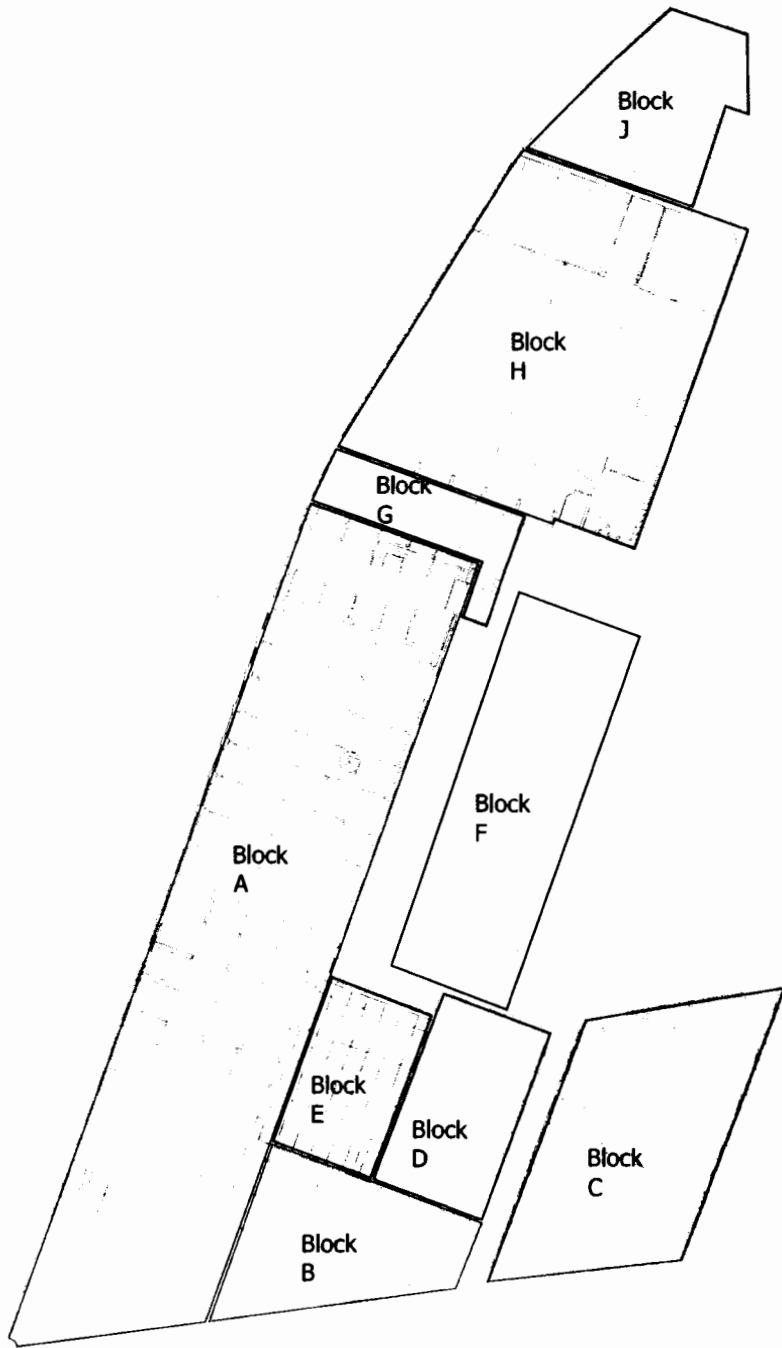
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Project No	Drawing No	Revision	
18449	3000	E	

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**Note:**

Blocks A, B, D, E, G, H and J form the Grade II Listed Building while C and F are within the curtilage of the Listed Building

**Key**

-  Retained and Refurbished
-  Rebuilt
-  Demolished

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**  
 Drawing Title  
**Figure 4.7  
 Redevelopment of North Warehouse**

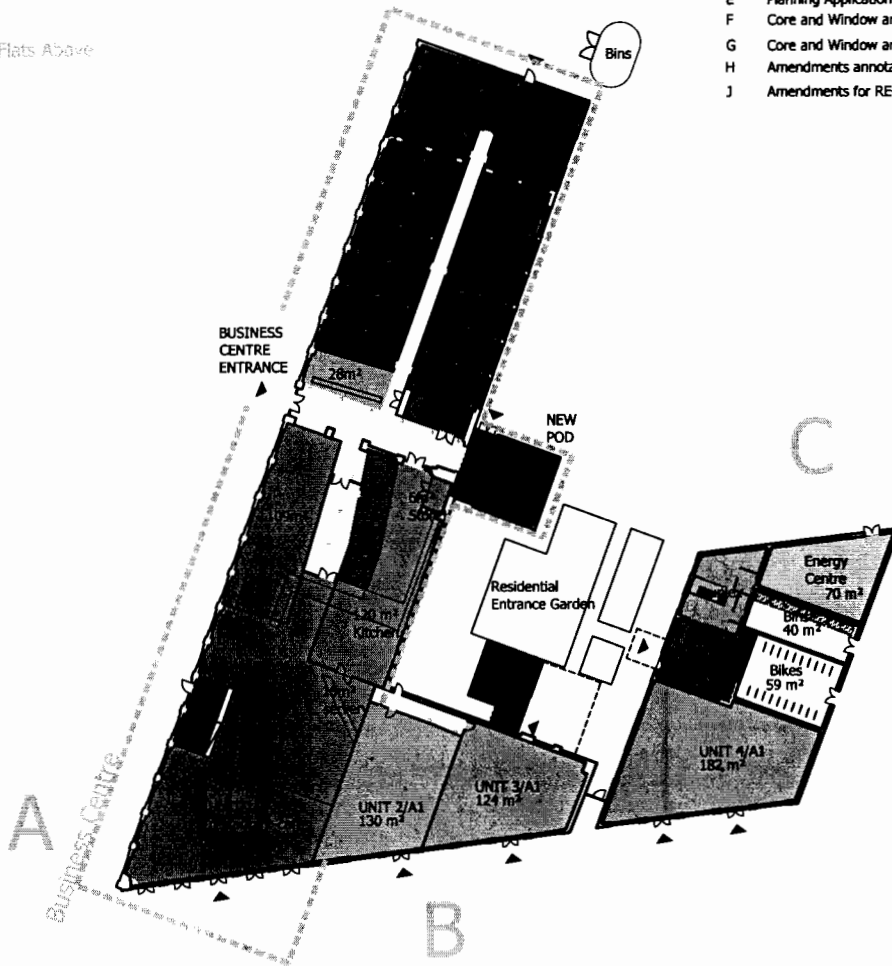
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Project No	Drawing No	Revision	
18449	4.7	-	



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A	16.04.12	PM	PJ
B	06/06/12	RP	PJ
C	20/06/12	PM	PJ
D	28/06/12	PM	PJ
E	25/07/12	PM	PJ
F	23/08/12	AB	PJ
G	01/02/13	PM	PJ
H	05/06/2013	PM	PJ
J	02/09/2013	JF	PJ

- A Business Centre
- B Commercial + Flats above
- C Commercial + Flats Above



Legend

- Office Units
- Workshops
- Workshop & Retail
- Retail
- Restaurant/cafe
- Energy Centre
- Reception
- Stairs/Lift/Toilet
- Residential
- Breakout Space/Meeting Space

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Listed Building Ground Floor  
 Area Keyplan**

Date	Scale	Drawn by	Check by
30.02.12	1:500@A3	PM	PJ
Project No	Drawing No	Revision	
18449	PL-001	J	

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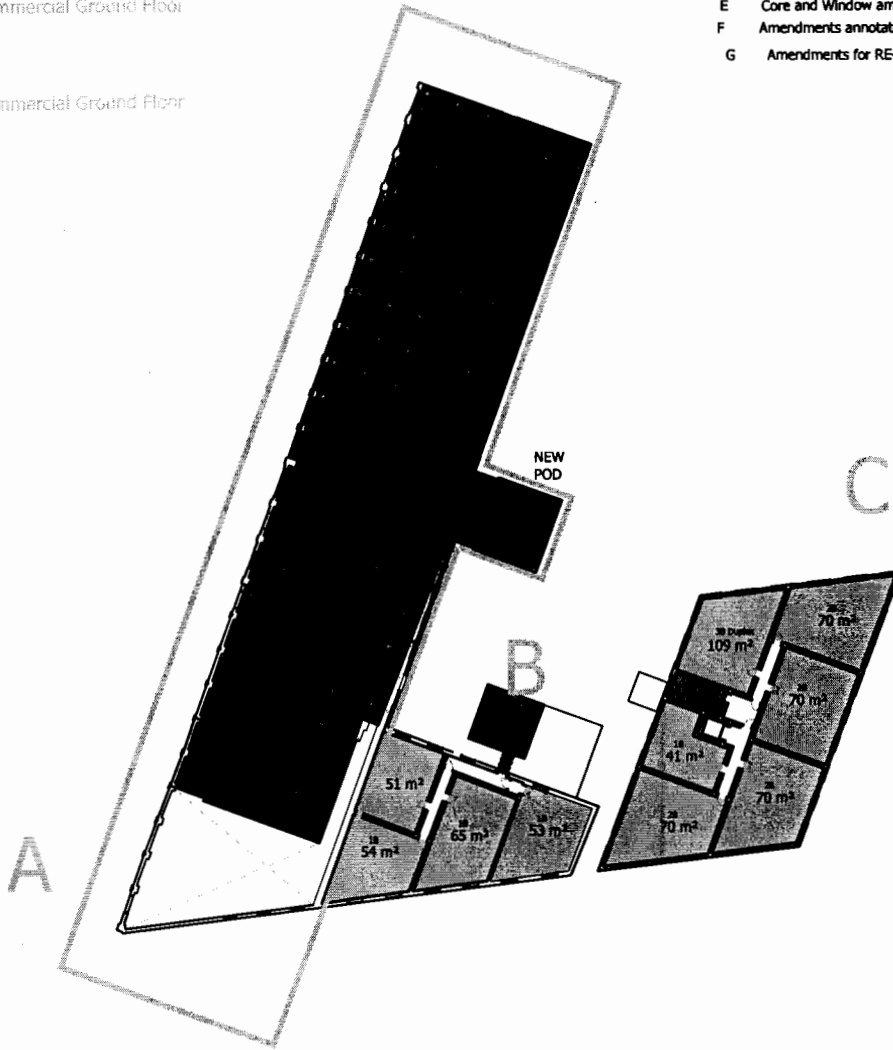
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B	06/06/12	RP	PJ
C	25/07/12	PM	PJ
D	23/08/12	AB	PJ
E	14.02.13	PM	PJ
F	05/06/2013	PM	PJ
G	02/09/2013	JF	PJ

- A Business Centre
- B Flats Above commercial Ground Floor
- C Flats Above commercial Ground Floor



**Legend**

- Office Units
- Workshops
- Workshop & Retail
- Retail
- Restaurant/cafe
- Energy Centre
- Reception
- Stairs/Lift/Toilet
- Residential
- Breakout Space/Meeting Space

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Listed Building First Floor  
 Area Keyplan**

Date	Scale	Drawn by	Check by
02/04/2012	1:500@A3	PM	PJ
Project No	Drawing No	Revision	
18449	PL-002	G	

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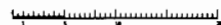
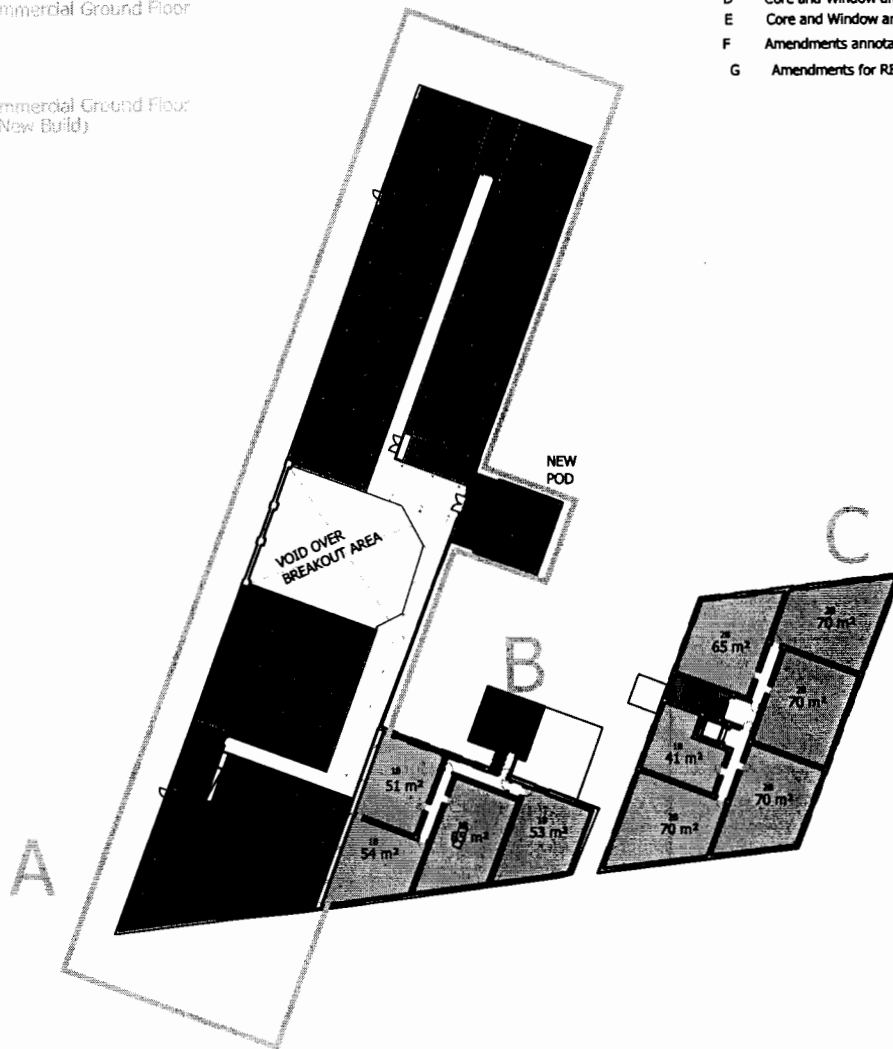


A  
B  
C

Business Centre  
Flats Above commercial Ground Floor  
Flats Above commercial Ground Floor  
(to be built as New Build)

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
A Flat Layout revised	16.04.12	PM	PJ
B Proposed demolition of industrial shed and construction of new residential accommodation.	06/06/12	RP	PJ
C Planning Application Issue	25/07/12	PM	PJ
D Core and Window amendments	23/08/12	AB	PJ
E Core and Window amendments	14.02.13	PM	PJ
F Amendments annotated for reference	05/06/2013	PM	PJ
G Amendments for RE-Submission	02/09/2013	JF	PJ



Legend

- Office Units
- Workshops
- Workshop & Retail
- Retail
- Restaurant/cafe
- Energy Centre
- Reception
- Stairs/Lift/Toilet
- Residential
- Breakout Space/Meeting Space

Project  
Old Fisons Site, Paper Mill Lane  
Bramford, Ipswich

Drawing Title  
Listed Building - Second Floor  
Area Keyplan

Date	Scale	Drawn by	Check by
02/04/2012	1:500@A3	PM	PJ
Project No	Drawing No	Revision	
18449	PL-003	G	

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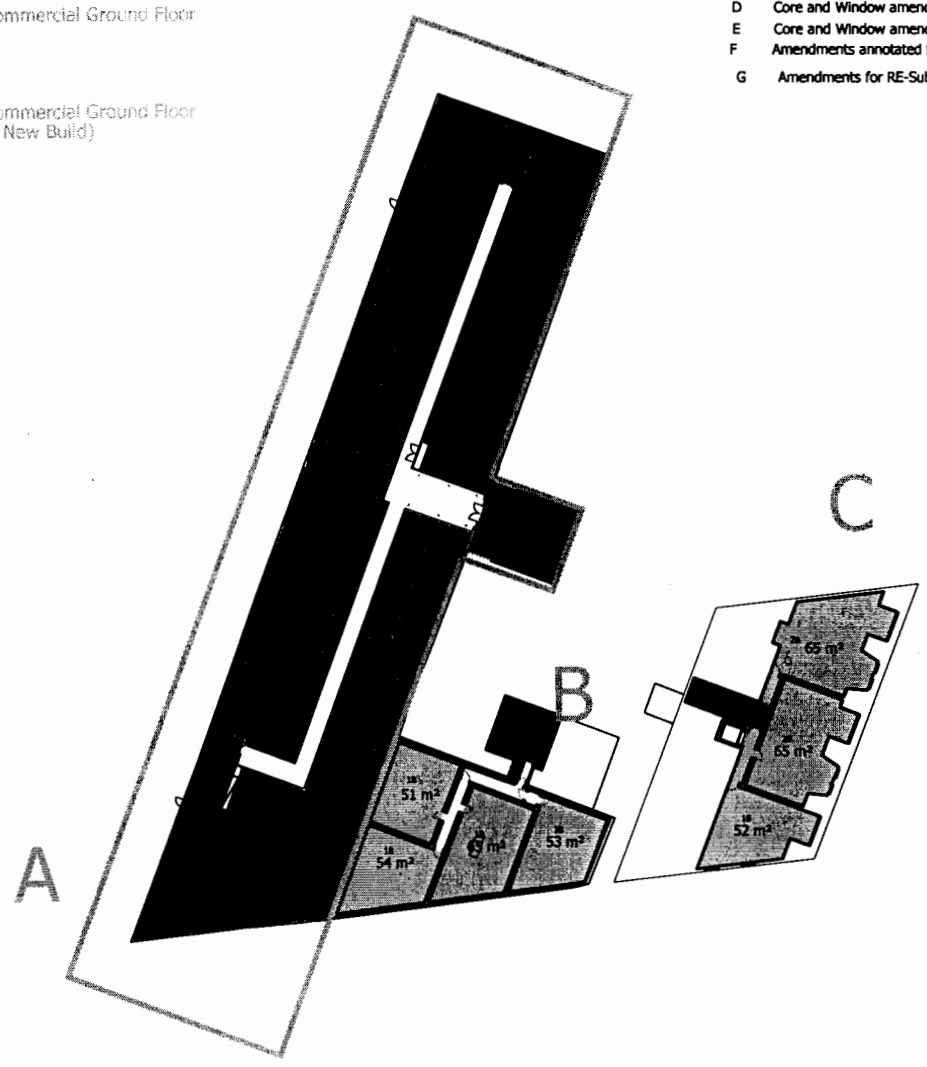




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B	06/06/12	RP	PJ
C	25/07/12	PM	PJ
D	23/08/12	AB	PJ
E	14.02.13	PM	PJ
F	05/06/2013	PM	PJ
G	02/09/2013	JF	PJ

- A** Business Centre
- B** Flats Above commercial Ground Floor
- C** Flats Above commercial Ground Floor (to be cost as New Build)



**Legend**

- Office Units
- Workshops
- Workshop & Retail
- Retail
- Restaurant/cafe
- Energy Centre
- Reception
- Stairs/Lift/Toilet
- Residential
- Breakout Space/Meeting Space

**Project**  
 Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich

**Drawing Title**  
 Listed Building -Third Floor  
 Area Keyplan

Date	Scale	Drawn by	Check by
02/04/2012	1:500@A3	PM	PJ
Project No	Drawing No	Revision	
18449	PL-004	G	

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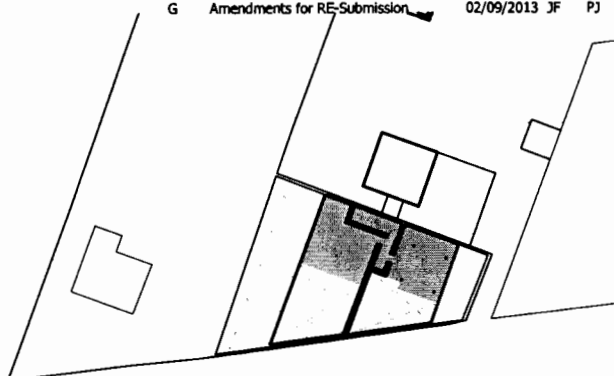
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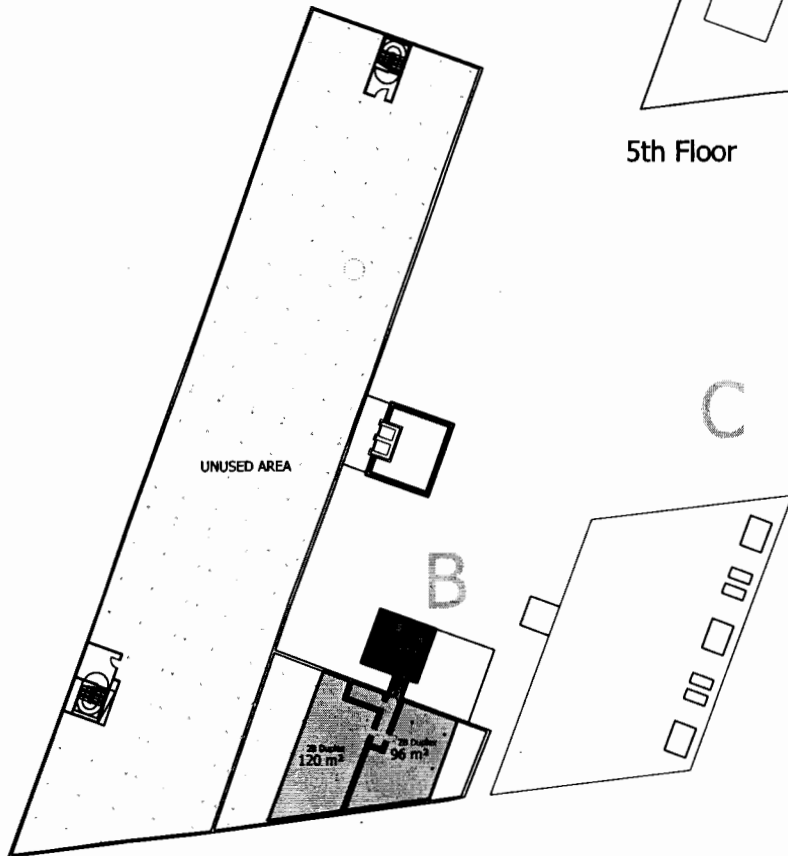


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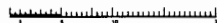
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B	06/06/12	RP	PJ
C	25/07/12	PM	PJ
D	23/08/12	AB	PJ
E	14.02.13	PM	PJ
F	05/06/2013	PM	PJ
G	02/09/2013	JF	PJ



5th Floor



4th Floor



**Legend**

- Office Units
- Workshops
- Workshop & Retail
- Retail
- Restaurant/cafe
- Energy Centre
- Reception
- Stairs/LIR/Toilet
- Residential
- Breakout Space/Meeting Space

Project  
**Old Fisons Site, paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Listed Building - Fourth Floor and  
 Fifth Floor Mezzanine Area Keyplan**

Date	Scale	Drawn by	Check by
05.04.2012	1:500@A3	PM	PJ
Project No	Drawing No	Revision	
18449	PL-005	G	

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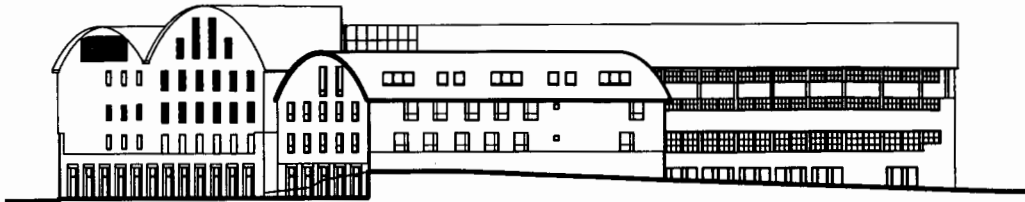
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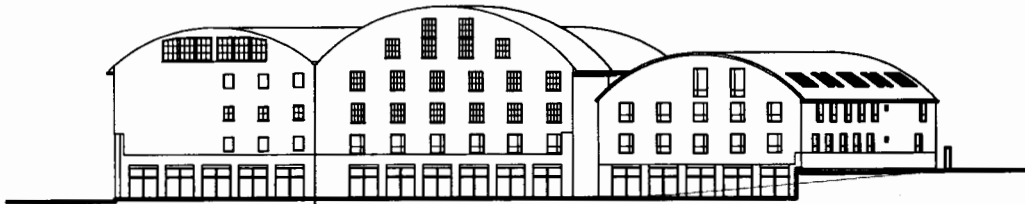
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B	23/08/12	AB	PJ
Core and Window amendments			
C	04.02.13	PM	PJ
Core and Window amendments			
D	05/06/2013	PM	PJ
Amendments annotated for reference			
E	02/09/2013	JF	PJ
Amendments for Re-Submission			



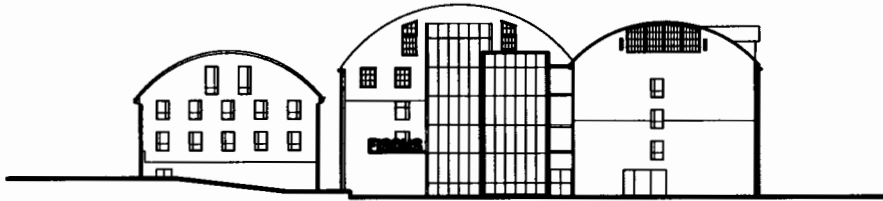
West Elevation



East Elevation



South Elevation



North Elevation

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Proposed  
 Elevations**

Date	Scale	Drawn by	Check by
21.12.11	1:500@A3	RP	PJ
Project No	Drawing No	Revision	
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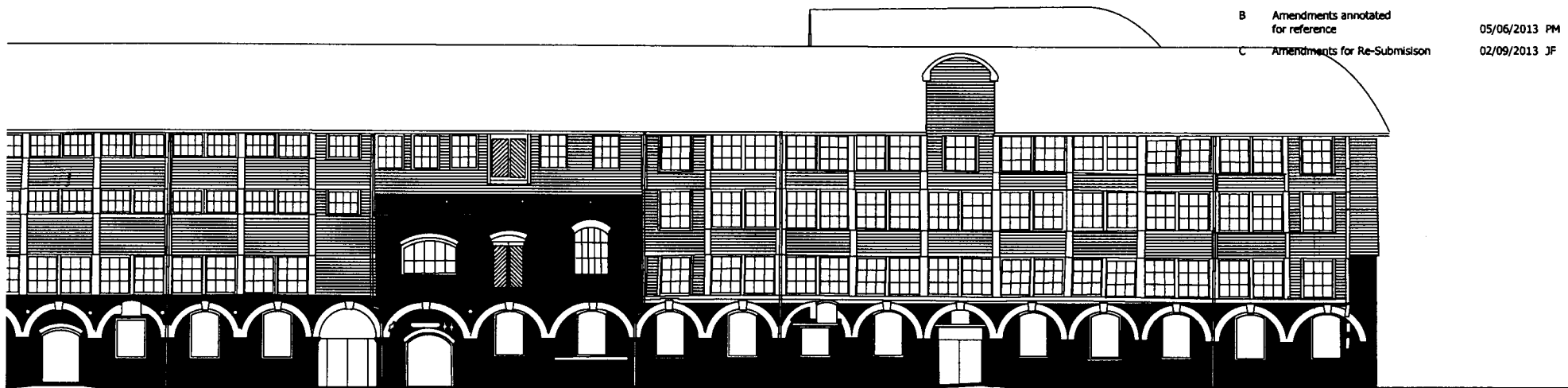
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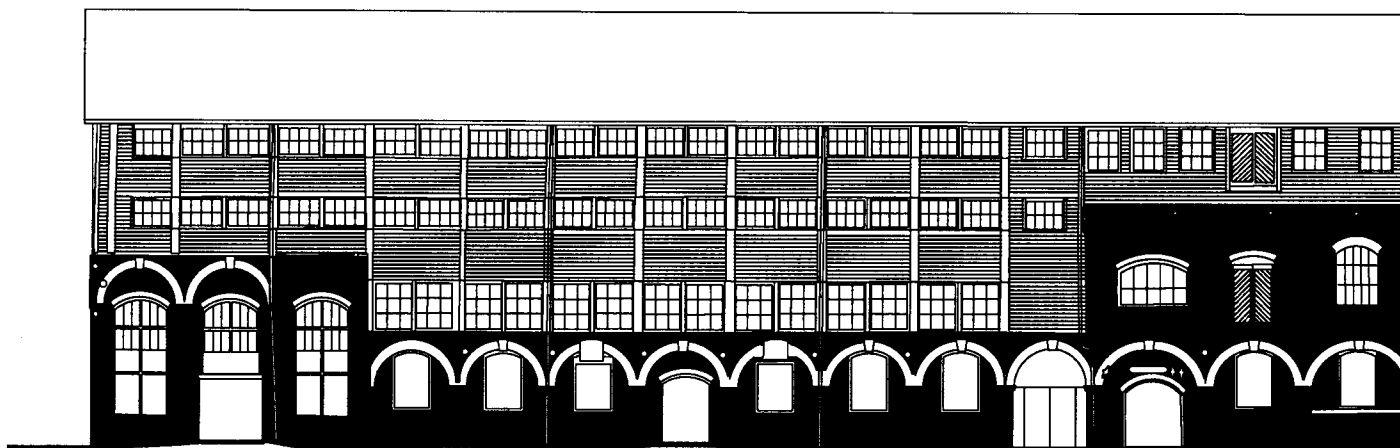
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Revision	Date	Drn	Ckd
A	04.02.13	PM	PJ
B	05/06/2013	PM	PJ
C	02/09/2013	JF	PJ



West Elevation Part 1



West Elevation Part 2

Project  
 Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich

Drawing Title  
**Proposed  
 Elevations**

Date	Scale	Drawn by	Check by
03.02.12	1:200 @ A3	RP	PJ
Project No	Drawing No	Revision	
18449	EL-02	C	

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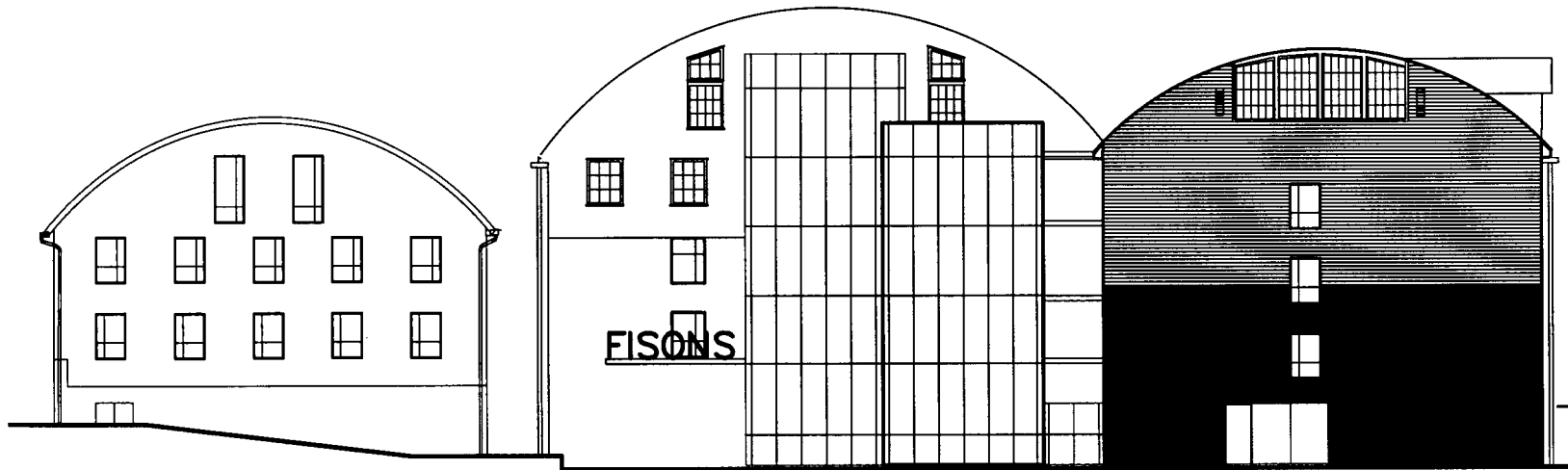
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Revision	Date	Drn	Ckd
A	Proposed redevelopment of industrial shed and construction of residential accommodation	06/06/12	RP PJ
B	Core and Window amendments	23/08/12	AB PJ
C	Core and Window amendments	04.02.13	PM PJ
D	Amendments annotated for reference	05/06/2013	PM PJ
E	Amendments for Re-Submission	02/09/2013	JF PJ



South Elevation



North Elevation

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Proposed  
 Elevations**

Date	Scale	Drawn by	Check by
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Project No	Drawing No	Revision	
18449	EL-03	E	

1309

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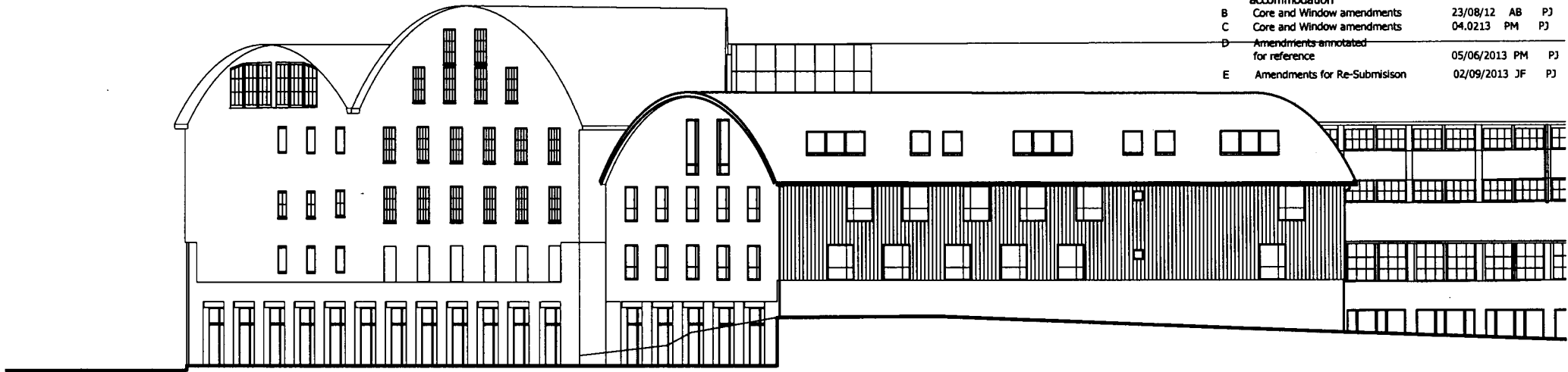
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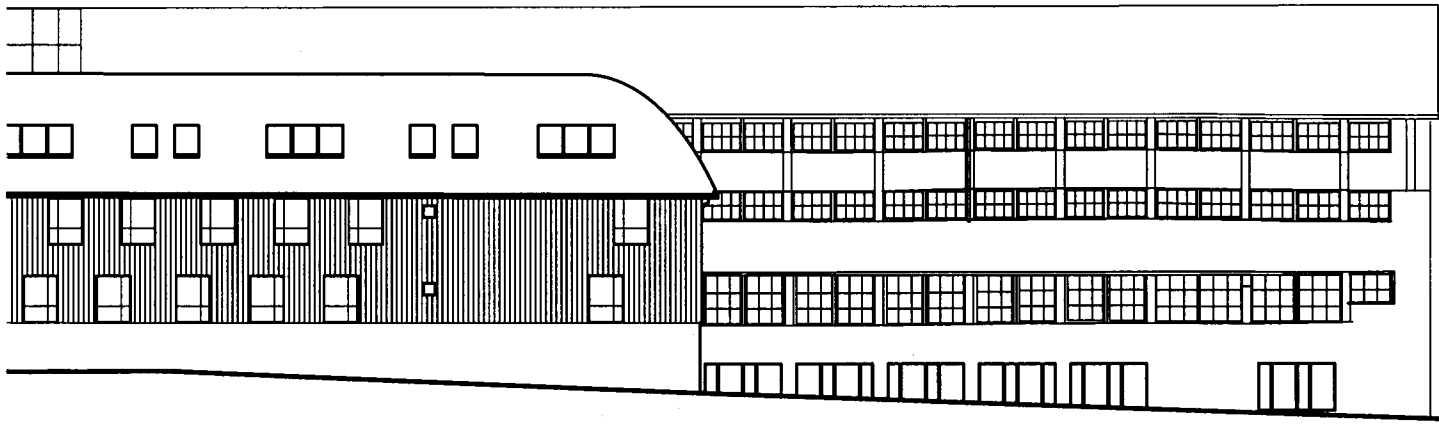


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Revision	Date	Drn	Ckd
A	Proposed redevelopment of industrial shed and construction of residential accommodation	06/06/12	RP PJ
B	Core and Window amendments	23/08/12	AB PJ
C	Core and Window amendments	04.02.13	PM PJ
D	Amendments annotated for reference	05/06/2013	PM PJ
E	Amendments for Re-Submission	02/09/2013	JF PJ



East Elevation Part 1



East Elevation Part 2

Project  
 Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich

Drawing Title  
 Proposed Elevations

Date  
 03.02.12

Scale  
 1:200 @ A3

Drawn by  
 RP

Check by  
 PJ

Project No  
 18449

Drawing No  
 EL-04

Revision  
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140

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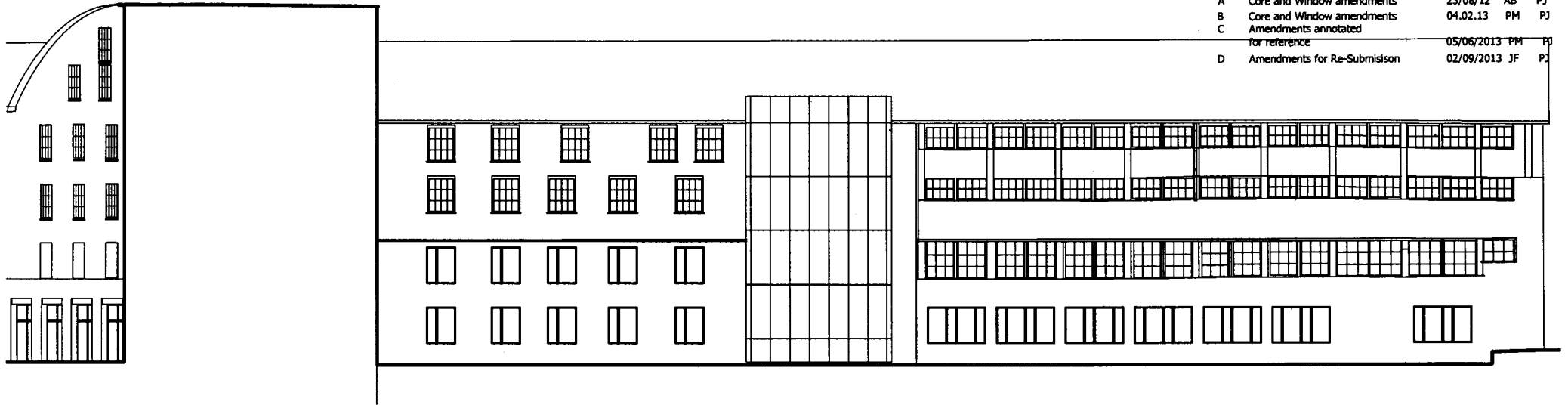
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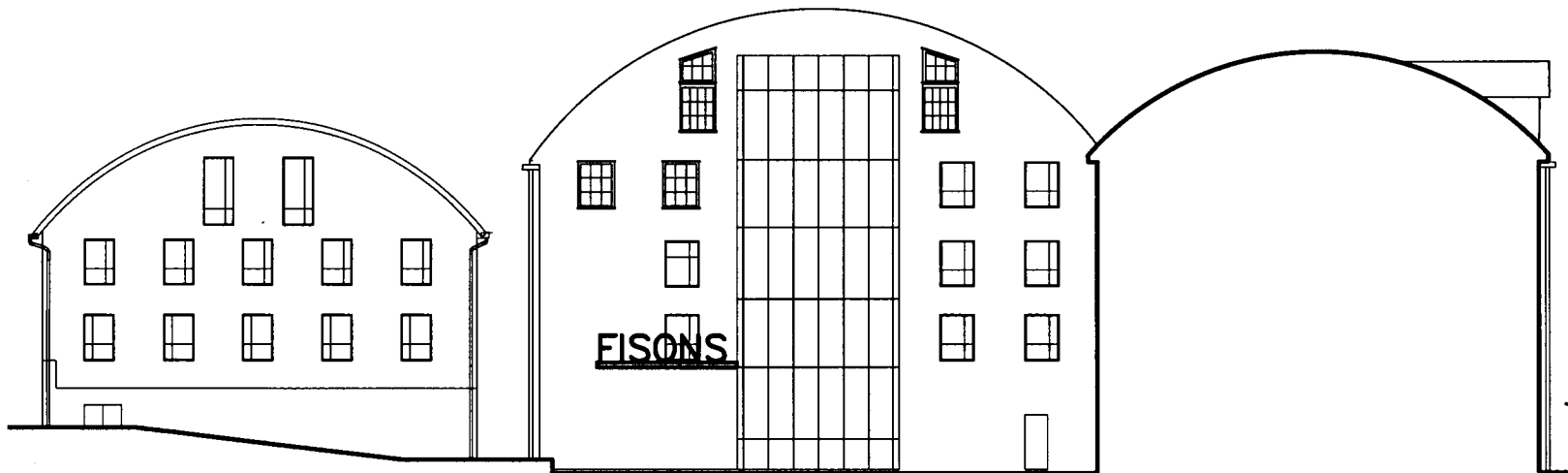
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Revision	Date	Drn	Ckd
A	23/08/12	AB	PJ
B	04.02.13	PM	PJ
C	05/06/2013	PM	PJ
for reference			
D	02/09/2013	JF	PJ



East Elevation; New Elevation Making Good Demolitions



North Elevation; New Elevation Making Good Demolitions

Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Proposed  
 Elevations**

Date  
 28.05.12

Scale  
 1:200 @ A3

Drawn by  
 RP

Check by  
 PJ

Project No  
 18449

Drawing No  
 EL-05

Revision  
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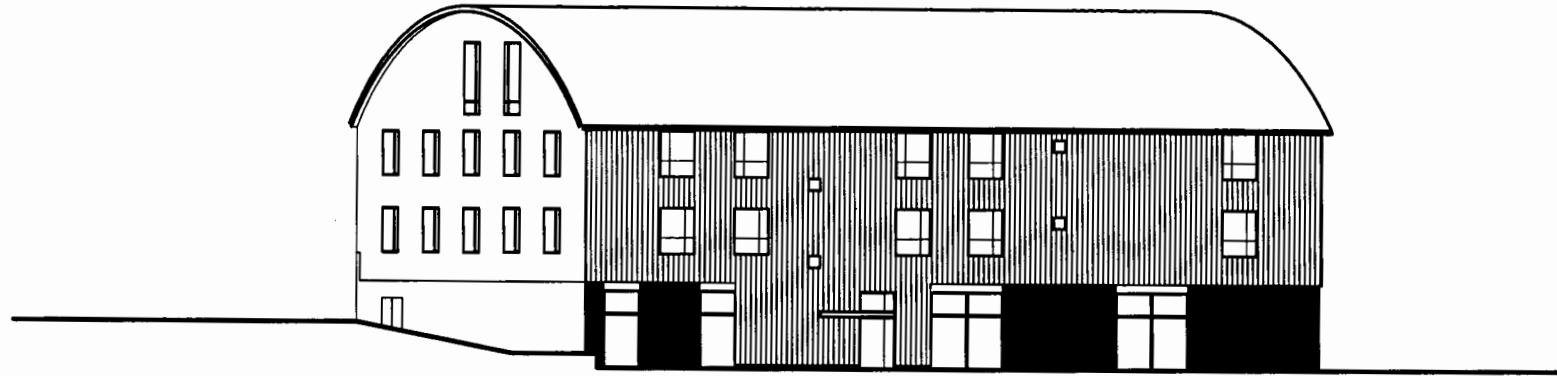


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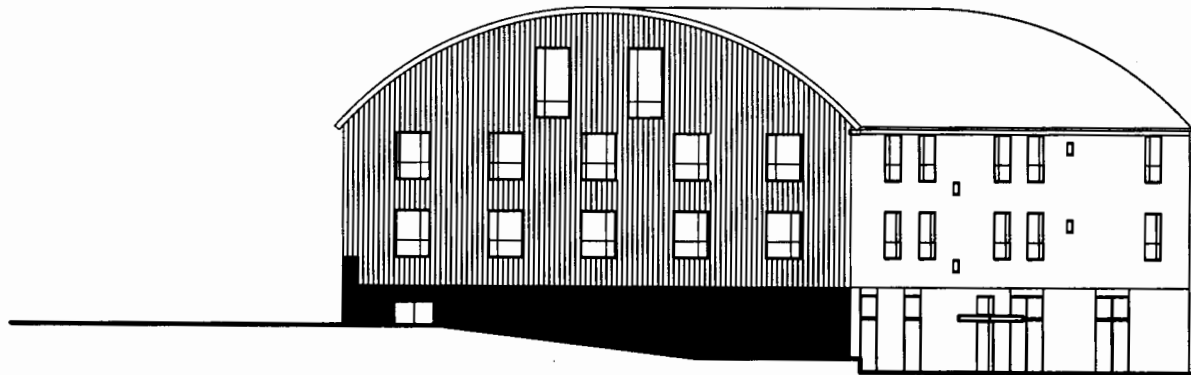
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Revision	Date	Drm	Ckd
A	23/08/12	AB	PJ
B	15.02.13	PM	PJ
C	05/06/2013	PM	PJ
D	02/09/2013	JF	PJ



West Elevation; New Build Residential and Commercial Barn



North Elevation; New Build Residential and Commercial Barn

Project  
Old Fisons Site, Paper Mill Lane  
Bramford, Ipswich

Drawing Title  
Proposed  
Elevations

Date  
28.05.12

Scale  
1:200 @ A3

Drawn by  
RP

Check by  
PJ

Project No  
18449

Drawing No  
EL-06

Revision  
D

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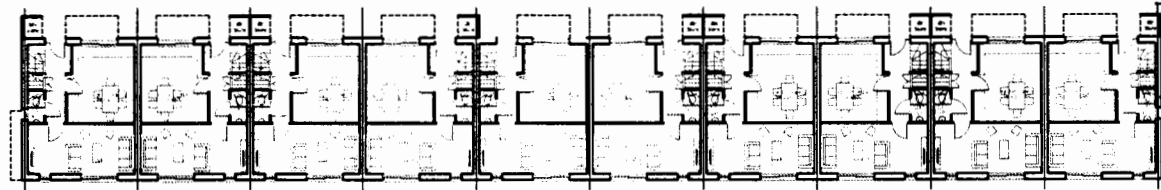


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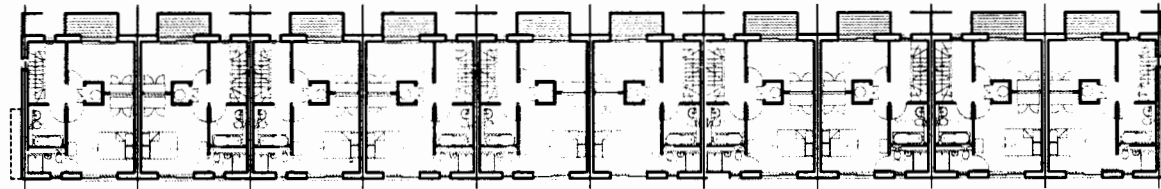


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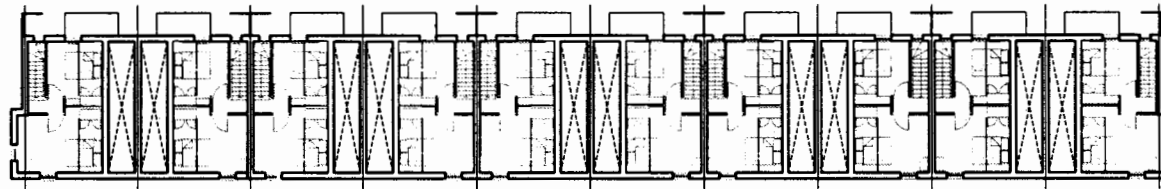
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B	16/05/13	PM	PJ
C	05.06.13	PM	PJ
D	30.06.13	JF	PJ



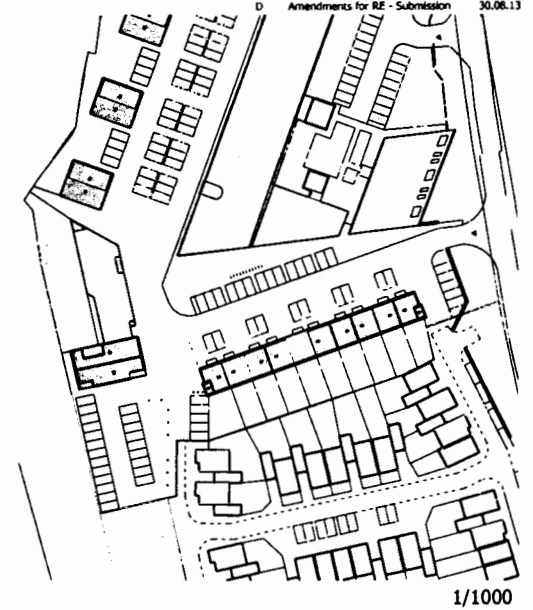
Ground Floor Plan



First Floor Plan



Second Floor Plan



1/1000

Material Key



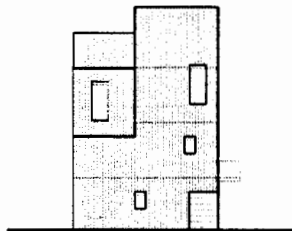
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2. Opaque Glass Panel
3. Timber Cladding
4. Corrugated Metal Cladding
5. Galvanized Steel Balcony with Glass Balustrade
6. Galvanized Steel Canopy
7. Galvanized Rain Water Pipe
8. Corrugated Metal Roof
9. Brick
10. Glass Balustrade
11. Bin Store Screen



Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Square Fronting Houses  
 Plans and Elevations**

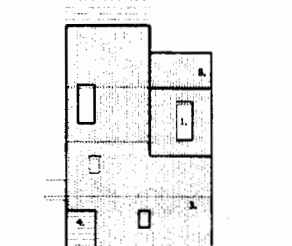
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03/07/2012	1:200@A2	PM	PJ
Project No	Drawing No	Revision	
18449	2300	D	



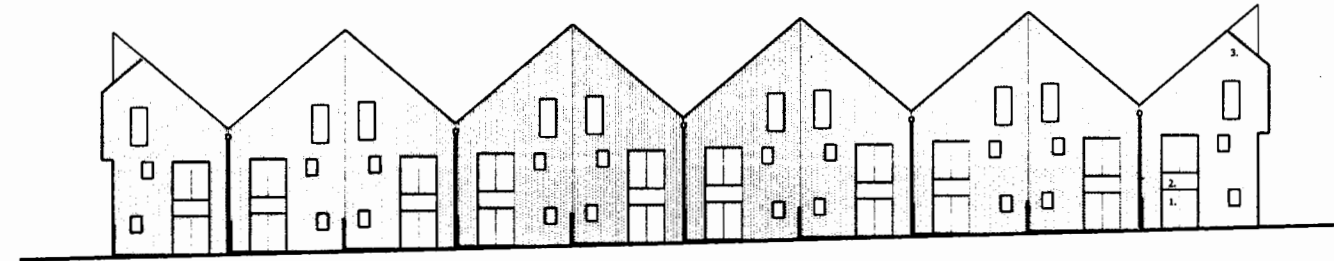
East Facing Elevation



North Facing Market Square Elevation



West Facing Elevation



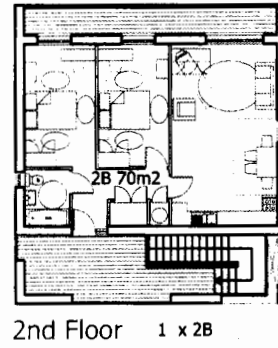
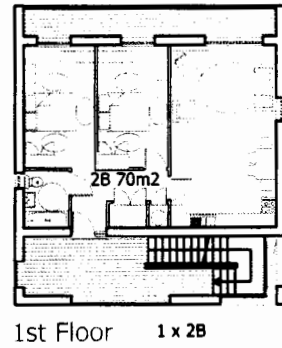
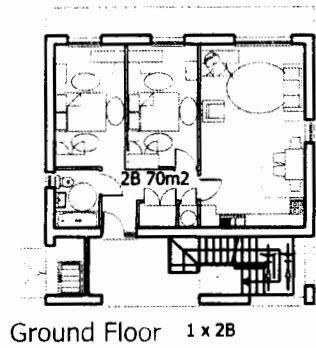
South Facing Back Elevation

143



The scaling of this drawing cannot be assured

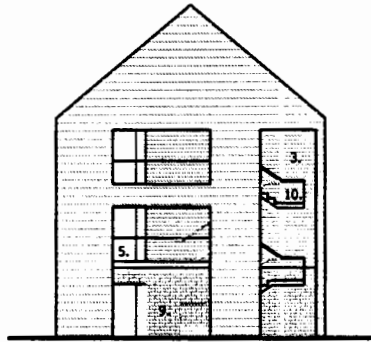
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A	23/08/12	AB	PJ
B	30.08.13	JF	PJ



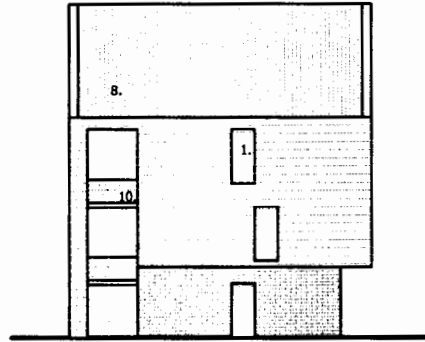
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1st Floor 1 x 2B

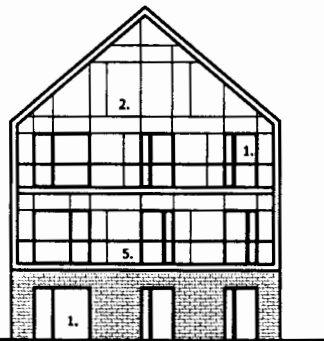
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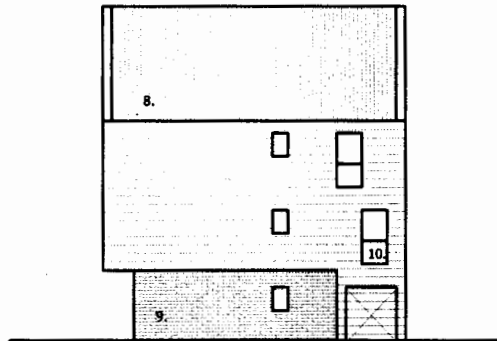
Front Elevation



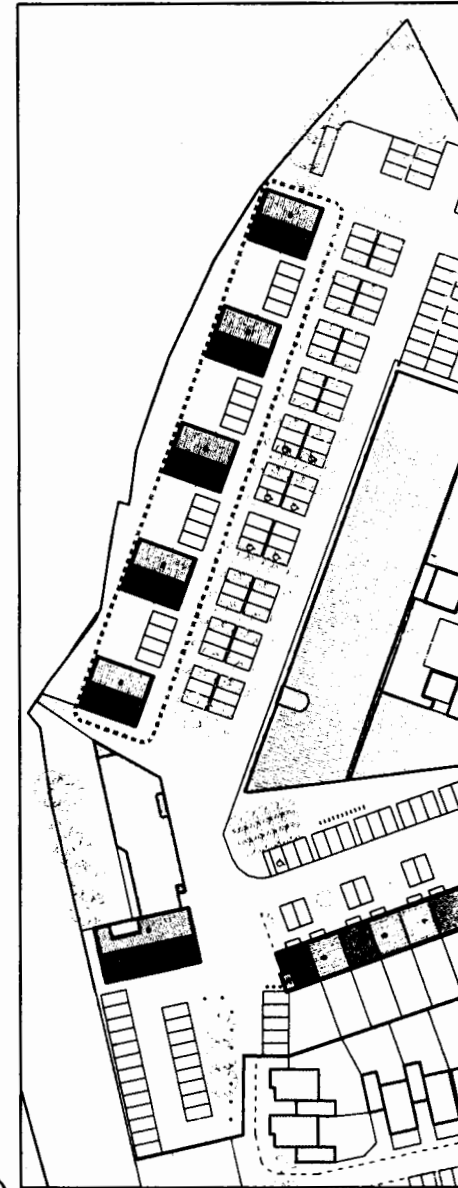
Side Elevation



Back Elevation

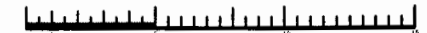


Side Elevation



### Material Key

1. Glazing
2. Opaque Glass Panel
3. Timber Cladding
4. Corrugated Metal Cladding
5. Galvanized Steel Balcony with Glass Balustrade
6. Galvanized Steel Canopy
7. Galvanized Rain Water Pipe
8. Corrugated Metal Roof
9. Brick
10. Glass Balustrade

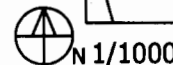


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Project  
Old Fisons Site, Paper Mill Lane  
Bramford, Ipswich

Drawing Title  
River Edge Flats  
Plans and Elevations

Date	Scale	Drawn by	Check by
10.07.12	1/200@A3	PM	PJ
Project No	Drawing No	Revision	
18449	2400	B	



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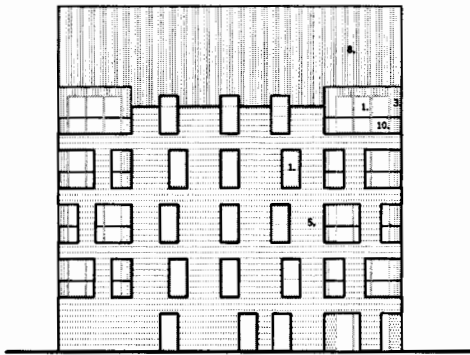
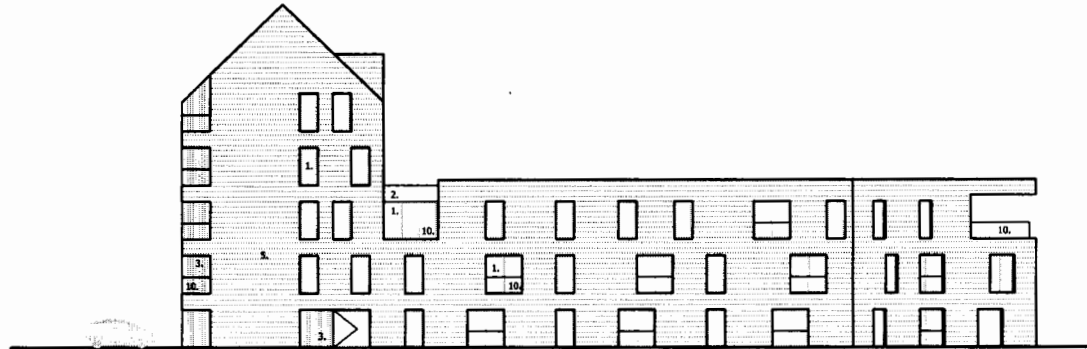


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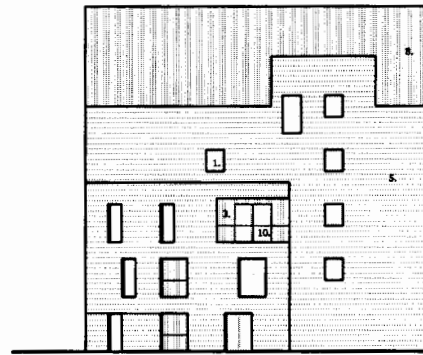
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A	External Corridor Glazed In	12.02.13	PM PJ
B	Amendments annotated for Reference	05.06.13	PM PJ
C	Amendments for RE - Submission	30.08.13	JF PJ

**Material Key**

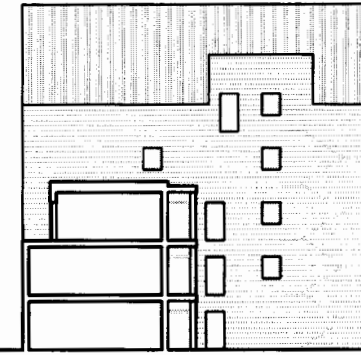
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3. Timber Cladding
4. Corrugated Metal Cladding
5. Galvanized Steel Balcony with Glass Balustrade
6. Galvanized Steel Canopy
7. Galvanized Rain Water Pipe
8. Corrugated Metal Roof
9. Brick
10. Glass Balustrade
11. Translucent Channel Glass System



South Facing Elevation

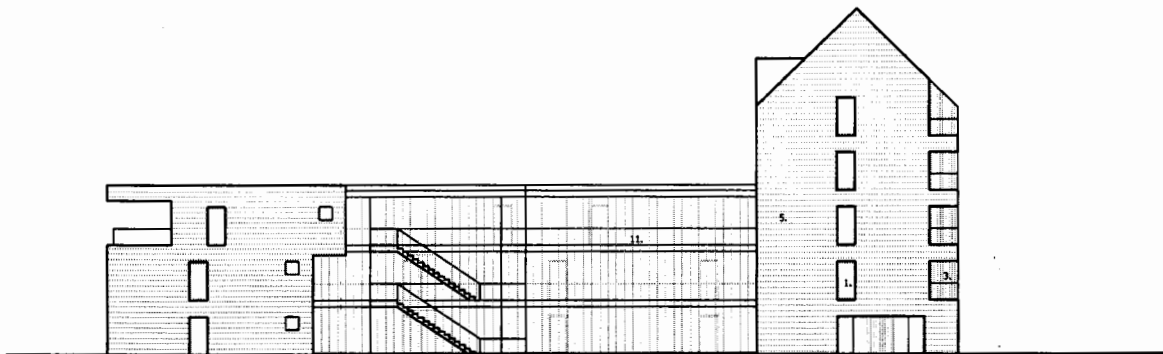


North Facing Elevation

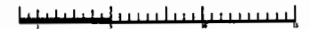


Section AA

145



West Facing Elevation



Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**

Drawing Title  
**Key Building Elevations**

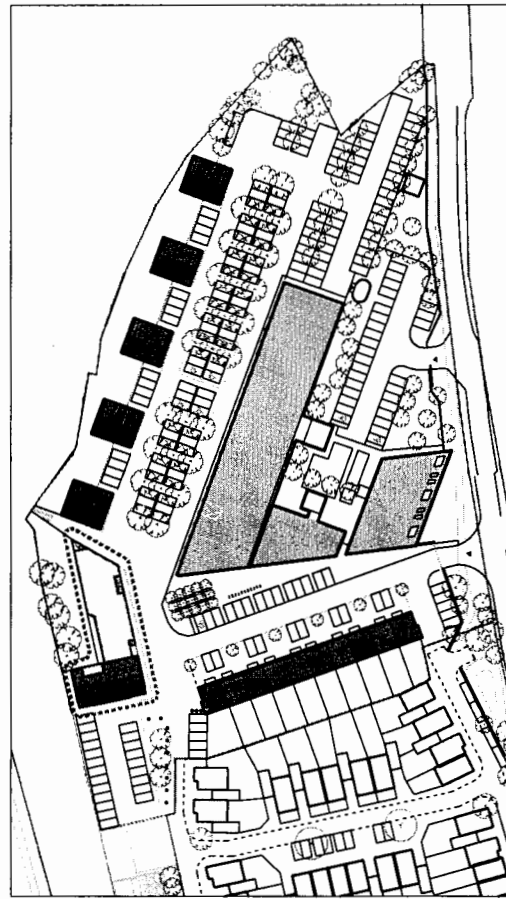
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03/07/2012	1:200@A2	PM	PJ
Project No	Drawing No	Revision	
18449	2200	C	

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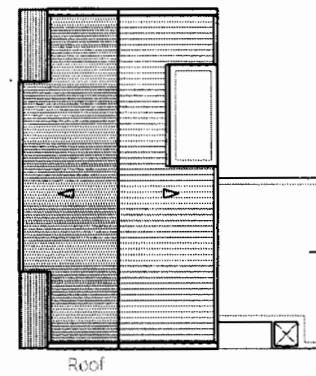
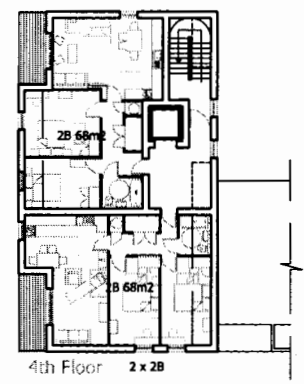
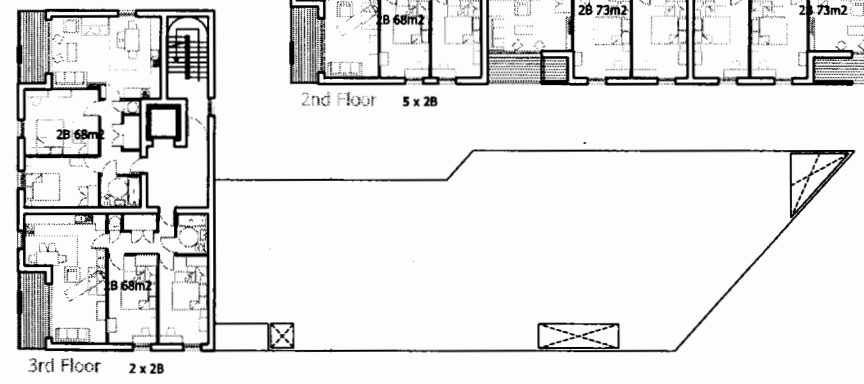
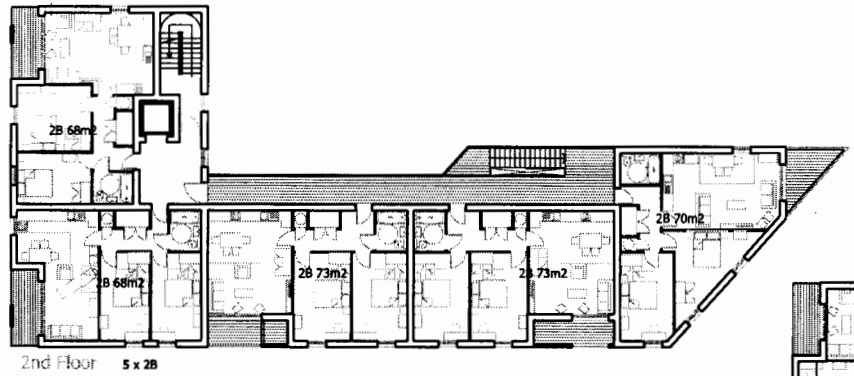
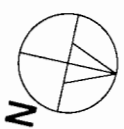
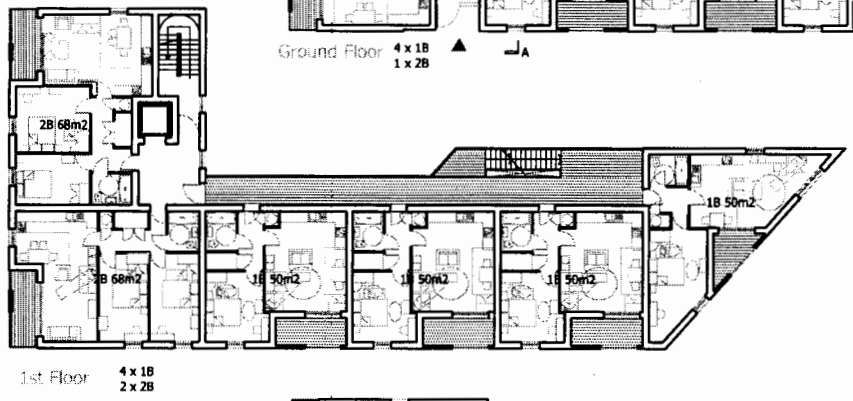
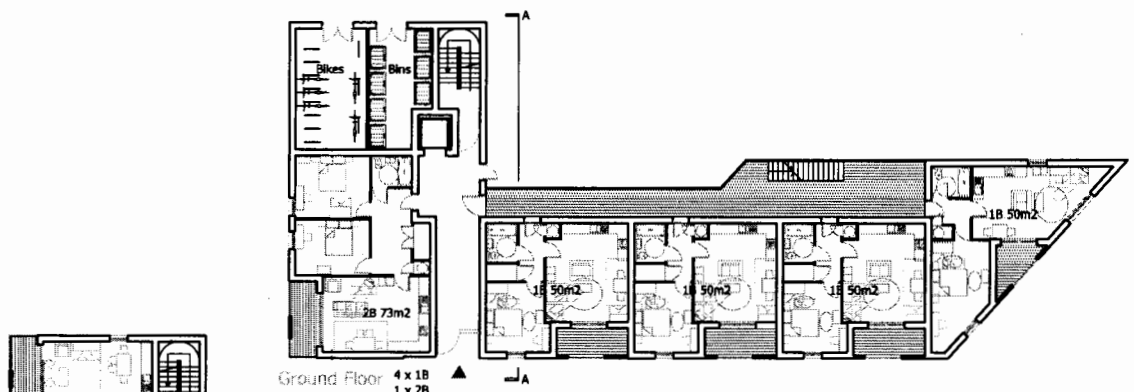
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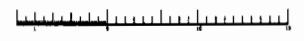


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Revision	Date	Drn	Ckd
A	05.02.13	PM	PJ
B	12.02.13	PM	PJ
C	05.06.13	PM	PJ
D	30.08.13	JF	PJ



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Project  
**Old Fisons Site, Paper Mill Lane  
 Bramford, Ipswich**  
 Drawing Title  
**Key Building Plans**

Date	Scale	Drawn by	Check by
03/07/2012	1:200@A2	PM	PJ
Project No	Drawing No	Revision	
18449	2100	D	

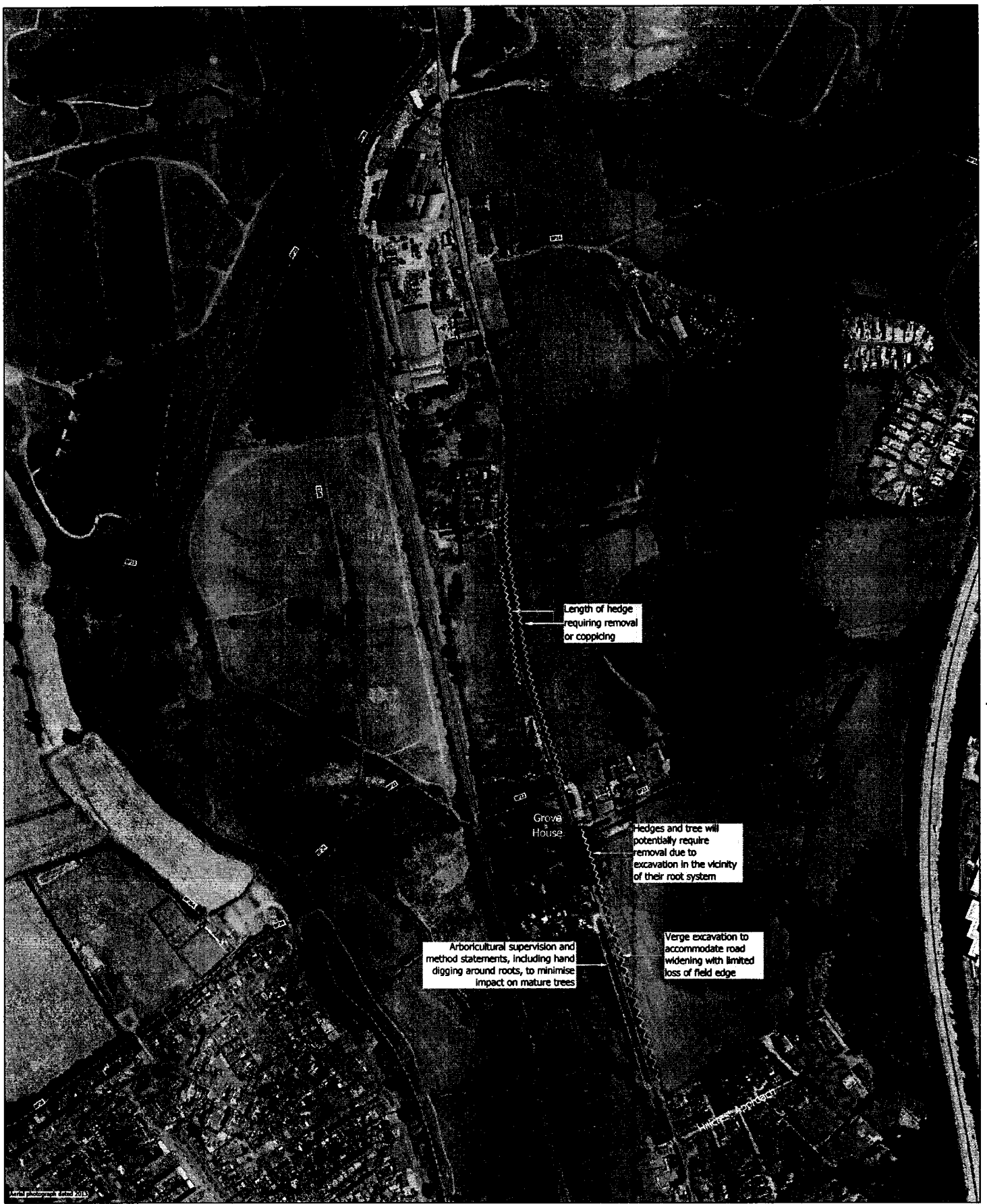
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**Legend**

- Site Boundary
- Public Rights of Way \*
- Indicative Extent of Hedges - To be impacted by proposals
- Indicative Extent of Mature Trees - To be impacted by proposals
- Indicative Extent of Verge - To be impacted by proposals

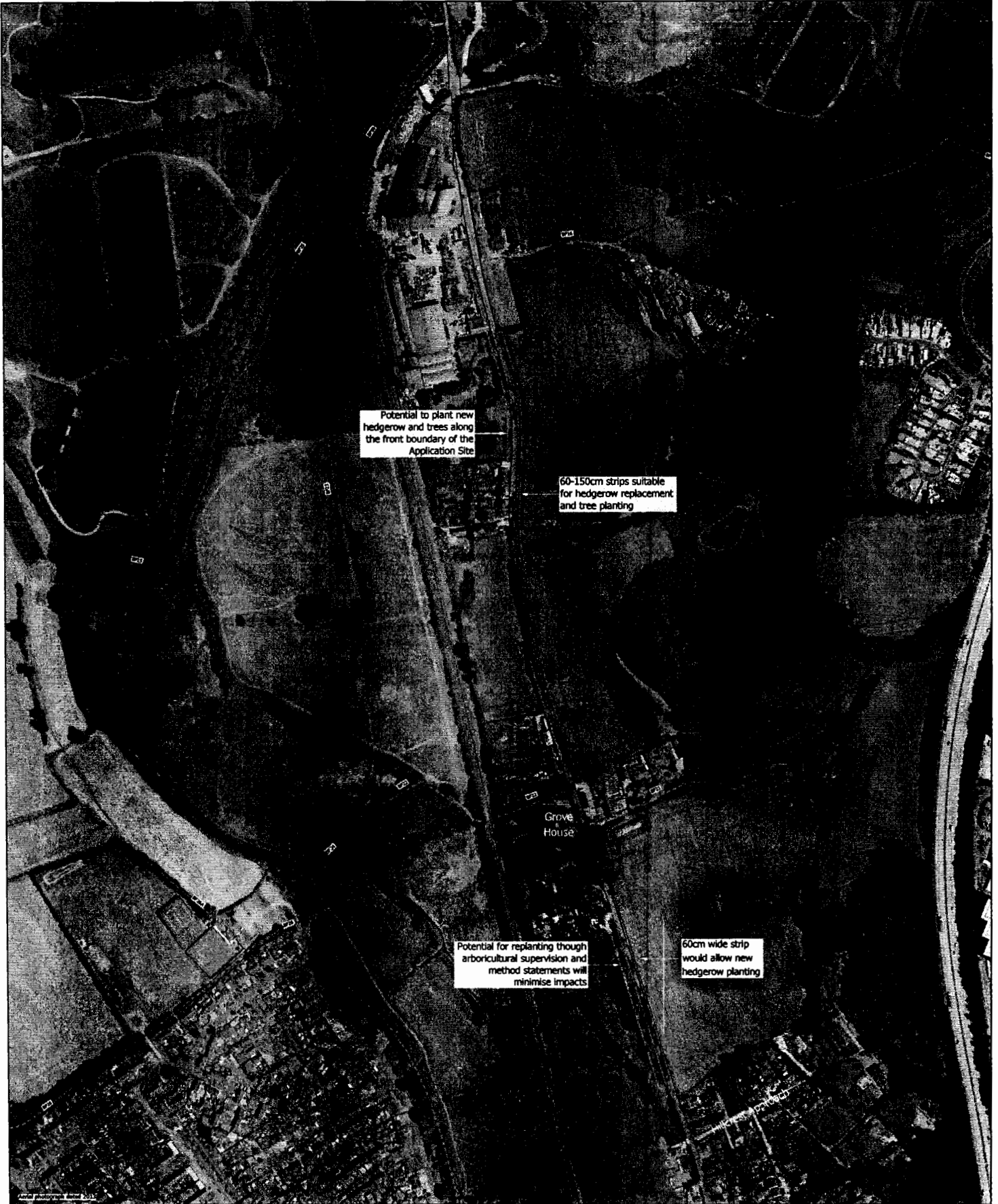
Source:  
 \* Suffolk County Council Working Copy Map Derived from Ordnance Map



Project:  
 The Old Fisons Site, Paper Mill Lane,  
 Bramford, Ipswich  
 Drawing Title:  
 Potential Impact of Proposals on  
 Landscape Features  
 Date: 13.02.2014      Scale: 1:5,000 @ A3  
 Project No: 18449      Drawing No: L11  
 Drawn by: MK      Check by: AM  
 Made by: AM

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Figure 1






Potential to plant new hedgerow and trees along the front boundary of the Application Site

60-150cm strips suitable for hedgerow replacement and tree planting

Potential for replanting though arboricultural supervision and method statements will minimise impacts

60cm wide strip would allow new hedgerow planting

Grove House

- Legend**
-  Site Boundary
  -  Public Rights of Way
  -  Indicative Extent of Potential Landscapes Mitigation



Project: The Old Fisons Site, Paper Mill Lane, Bramford, Ipswich  
 Drawing Title: Potential Landscapes Mitigation

Date: 12.02.2014	Scale: 1:2,000 @ A1 1:4,000 @ A2	Drawn by: JMC	Check by: AM
Project No: 18449	Drawing No: L12	Author:	Reviser:

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Figure 2

**AMENDED PLANS CONSULTATION**

**PARISH COUNCIL**

Comments from: Bramford Parish Clerk, The Old School

**Planning Officer:** Elizabeth Truscott

**Application Number:** 2700 / 12

**Proposal:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.  
(Re-advertised - amended plans/information received)

**Location:** Land at the former Scotts/Fisons site, Paper Mill Lane, Bramford

**Please find below the comments from the Parish Council:**

Bramford Parish Council's main concern that the tower block be no more than 5 storeys and 19m high has been resolved in the 2014 scheme. We are in favour of the Fisons development and would now like it to proceed as soon as possible, commencing with the protection of the listed buildings against further deterioration, followed by the completion of the works to Paper Mill Lane, prior to the remainder of the works. Our remaining, more minor concerns expressed in our 2013 response to MSDC, have not been addressed in the 2014 scheme but can be discussed and hopefully resolved at a later date.

MID-SUFFOLK DISTRICT COUNCIL  
PLANNING CONTROL  
**RECEIVED**  
28 JUL 2014  
ACKNOWLEDGED .....  
DATE .....  
PASS TO ..ET.....

Signed:                     *Clee*                     Date:                     23/7/14                      
*Parish Clerk*

## Consultee Comments for application 2700/12

### Application Summary

Application Number: 2700/12

Address: Land at the former Scotts/Fisons site, Paper Mill Lane, Bramford

Proposal: Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas. (Re-advertised - amended plans/information received)

Case Officer: Ian Ward

### Consultee Details

Name: Mrs Claire Lee

Address: The Parish Room, Ship Lane, Bramford IP8 4AN

Email: [bramfordparishcouncil@btinternet.com](mailto:bramfordparishcouncil@btinternet.com)

On Behalf Of: Bramford Parish Clerk, The Old School

### Comments

Bramford Parish Council is in favour of the scheme but requests that a Condition be imposed to ensure protection of the listed buildings from further deterioration as a priority if planning consent is given. This protection must be implemented before commencement of the enabling development comprising the residential units.

We support the revised modifications to Paper Mill Lane as shown on drawings attached to this application and in the Environmental Statement. This supersedes the scheme shown on pages 86 and 98 of the Design and Access Statement which is also submitted with the application.

We do not object to the tower block shown as 5 storeys high and 19m high as shown on drawing 3000, but we do fundamentally object to the scheme if this building is to be 6 to 8 storeys high and 29metres high. It is shown as 5 storeys high on drawing 2200, p40 of D&A, fig37 p50 of D&A and fig46 p66 of D&A. But the reference to 5 storeys and 19m has been deleted and substituted by 6-8 storeys and 29m high on p7 of the ES Addendum, and p47, 48 and 51 paras 7.120, 7.122, 7.124, 7.125 and 7.129, and in the non technical ES summary on p15 para 4.9, and on the drawing of building heights, and in the D&A on p105 fig63 and on unbound drawings 4.2 and 4.3. The taller tower height is unacceptable to Bramford.



In agreement with other consultees, we request the display of historical information on the site and the preservation/restoration and exposure of the old dock.

We also request:-

- A planning condition to ensure that the modifications to Paper Mill Lane are completed
- Restrict access onto the water meadows by motor bikes, quad bikes and horses
- Keep Bramford Parish Council involved in the progress of the design for the south of the site
- Bramford Parish Council would like to receive assurances from the developer who will be responsible for the swales/drainage on the meadows once the developer has finished
- The Parish Council has concerns regarding the use of the land for horses and would like to see restrictions in place so that access to the site is by footpaths only.

We suggest:-

- Consider self coloured (maintenance free) composite substitute for timber cladding on any new weatherboarded buildings
- Consider installing electric vehicle charging points in car park.

## **Bramford Parish Council Response to Fisons Planning Application 2700/12 & 2701/12**

Bramford Parish Council supports the Application as a whole and acknowledges the potential for social, economic and environmental benefits for Bramford and its heritage.

We consider that the following safeguards are required:

- **Listed buildings:** MSDC to impose a Condition on the developers to carry out sufficient weatherproofing repairs to Blocks A and B to prevent further deterioration, within a set number of months of obtaining Planning Permission. This is required to avoid the danger of Blocks A and B becoming irrevocably damaged, which could jeopardise the financial viability of restoring the Listed buildings and result in only a large housing development. (Reference MSDC policy HB6 Securing the repair of Listed buildings, and Structural Appraisal document Risk Register items 1 and 14).
- **Paper Mill Lane modifications:** MSDC to impose a Condition on the developers to ensure that the modifications to Paper Mill Lane are completed. This work forms an integral part of the Planning Application but it is also included in the loose sheets Register of S106 Planning Obligations. NPPF Clause 173 states that development must not be made unviable by onerous planning obligations, and we require assurance that the Paper Mill Lane modifications cannot be accepted into this category.
- **Residential density:** In compliance with NPPF Clause 66, MSDC and the developers should keep Bramford Parish Council fully involved in progress with the Outline Application for the south of the site, especially as financial constraints could require the developer to increase the residential density.

We have some suggestions for improvement of the scheme:

- **“Green” infrastructure:** Enhance the “green” credentials of the scheme by providing electric vehicle charging points in the car park. (Reference NPPF clause 35).
- **Practicality:** On the “church” block, increase the extent of enclosure on the deck access, perhaps fully enclosing with glass, because the west elevation is subject to prevailing winds and rain.
- **Long term appearance:** Consider using a self-coloured composite substitute for the timber cladding on residential blocks to minimise maintenance problems over the life of the development. Inevitable degradation of natural timber cladding has soon spoiled the appearance of many new developments in Ipswich. (Reference NPPF 58: “Planning decisions should aim to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.....respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation”, and GP1 “Materials and finishes should be traditional or compatible with traditional materials and finishes and should respect local architectural styles where appropriate”).

- **Industrial heritage:** The former railway lines are to be preserved in the paving on The Avenue. In the interests of heritage, we would like the developer to propose creative solutions to draw attention to the former dock which was shown as built over by 1965 and will be partly residential garden and partly outside the site boundary on this scheme. As a minimum, this should include an interpretation board and appropriate naming of the area. (See Environmental Statement 2 of 3, fig 3 photo from 1916, Envirocheck maps of 1882, 1904, 1926 and 1965, and pages 37 and 81 of Design and Access Statement showing Illustrative Master Plan, and Avenue and Parking). (Reference MSDC policy CS5 sub para Historic Environment).
- **Biodiversity and recreation:** In consultation with Suffolk Wildlife Trust, find a way to restrict access onto the meadows to the west of the railway line by motor bikes, quad bikes and horses in the interests of the ecology of the site, while retaining access for pedestrians, cyclists and wheelchairs. (Refs RSS ENV1, MSDC SO1, Landscape, biodiversity and geodiversity, SO14 Recreational activity, and CS5 Habitats along The Gipping).
- **Road Safety:** Consider priority markings at the chicane on Paper Mill Lane.
- **Footpaths:** We are concerned that the footpaths provided do not effectively link up with the village and would like to see further consideration given to this matter.

## **CONSERVATION OFFICER COMMENT**

2700/12

2701/12

Scotts / Fisons warehouse, Bramford

### **Enabling development**

Since becoming disused the listed warehouse has featured on the Suffolk register of Buildings at Risk because of concerns over its lack of use and its deteriorating condition. It suffers from a 'conservation deficit', meaning the cost of repairing the building would be greater than its value following repairs. The proposal therefore includes 'enabling development' in the form of extensive residential development aimed at generating a surplus to bridge the conservation deficit. In such cases the proposed development would typically be contrary to policy, but is accepted to be justified by saving the listed building.

The NPPF at paragraphs 132 and 134 asks for any harm to heritage assets to be justified by wider public benefits; the greater the significance of the asset or the greater the harm caused, the greater the benefits should be to provide adequate justification. At paragraph 140 the NPPF sets out a test for assessing proposals which involve enabling development, asking whether the benefit of securing the future of the heritage asset outweighs the disbenefits of departing from policy.

In this instance the application does not follow this classic model of enabling development. It is calculated that the surplus available from the enabling development within the site would still not be enough to cover the conservation deficit. The proposal therefore includes reducing the repair bill by demolishing parts of the existing building. The case presented in the application is that although this is harmful to the heritage value of the building, the harm is outweighed by the public benefit of repairing the main part of the building and securing its future in a new use.

### **Significance of the site**

The history of the site is described in detail in the Heritage Statement. The south part of the site was developed for manufacture of superphosphate fertiliser from 1851 by Edward Packard and the north part of the site from 1858 by Joseph Fison. The main surviving building at the site retains the footprint and west elevation of Fison's original building. A major phase of extension and alteration around 1900 included almost completely rebuilding of the interior behind the original west elevation, and addition of extra storeys. Several other buildings survive from this time, including Blocks C, D, E and H. Through the 1900s the site changed appearance repeatedly with modern buildings and industrial plant replacing earlier structures across most of the site.

The listed building also includes Blocks B, D, E, G, H, and J. Building C is considered to be 'curtilage listed'; Building F dates from after 1948 and does not qualify as 'curtilage listed'.

Block A is the main part of the listed building and retains most of the west façade of Fison's original building. It has a design of some architectural ambition – a palace of industry – with a long brick façade at single storey with taller features at the centre and north end. By 1895 it had been reached two storeys. By 1905 it had been substantially rebuilt internally, raised to four storeys, and extended to the east and north, but retaining the impressive west elevation. The interior consists of vast expanses of open floor supported by cast iron columns and timber beams, with a few relics of the original structures. This is the only building at the site dating before 1895.

The site and buildings date back to the beginnings of the chemical fertiliser industry. Block A of the listed building is an unusually early survival whose imposing presence in the landscape reflects the key role of the industry in driving changes in agriculture. The site also relates to other industrial development which grew up to take advantage of the Gipping navigation and the railway.

#### Pre-application discussions

Following closure of the site two schemes have been proposed for conversion of the listed building to commercial and retail uses, with residential units above and additional development elsewhere on the site. This approach was broadly supported by officers and by English Heritage. In the first scheme your officers expressed concern that the history and evolution of the building had not been adequately researched. English Heritage expressed concern at the degree of subdivision proposed within the listed building. The current application is based on the second scheme and is supported by a heritage statement.

#### Impacts of the proposal:

##### *Uses*

The building as it stands is the result of several phases of alteration to suit specialised functions. The resulting long vistas with low ceilings and rank upon rank of iron columns are memorably striking, but are unlikely to be suitable for any single alternative use. A degree of subdivision is accepted to be inevitable. English Heritage requested at pre-application stage that any scheme should allow the scale and size of the building to be appreciated internally. In the view of officers the proposed layout both respects changes in the internal structure, and includes such features as the void space at 1<sup>st</sup> and 2<sup>nd</sup> floor in the centre of Block A. The length of units at 2<sup>nd</sup> floor and above will retain the existing character of the building.

##### *Demolitions*

It is proposed to demolish Blocks D, E, G, and H. None of these parts date from the original development of the site, but were part of a major phase of extension and alteration about 1895-1905; Block G is a more recent element linking Blocks A and H. Block D is the only brick structure in this part of the site. It is a plain brick box with segmental curved roof on metal trusses; the windows have arched heads. Blocks E and H resemble Blocks A and B in structure and form. Block E is a simple infill extending the internal space of Blocks A and B, and comprises a row of iron columns on the west, a roof and a north wall. From aerial photographs Block H was a major free-standing

building at least as high as the original building, but subsequently reduced to two-storey height.

It is also proposed to remove several brick buildings in the southern part of the site. There is no appraisal of these in the Heritage Statement. Although some of these correspond to buildings appearing in historic maps and photographs, they have evidently been altered in several phases and no longer have sufficient integrity to merit retention.

To the north of the listed building it is proposed to demolish Paper Mill House on the west side of Paper Mill Lane as part of a scheme of highway improvements. There is no appraisal of this building in the Heritage Statement. The building has brick walls and a window of 19<sup>th</sup> century appearance, but the roof has a steep pitch and rendered gables, and is racking to the east. This is indicative of an earlier origin, possibly 1600s, and the proposal should not go forward without a proper understanding of the significance of this building.

#### *Alterations*

The aim of the proposal is to retain the external elevations and internal structure as existing with infills and new openings in overtly contemporary idiom, expressing this important new phase in the building's evolution.

The existing fenestration and windows make an important contribution to the building's architectural character, and the details for replacement windows are of a standard type with no indication how glazing bars will be handled. On the upper floors of the east elevation the windows are believed to be original. Wholesale replacement cannot be acceptable, although it must be recognised that opening windows will be essential for future uses. The existing windows are simple sashes attached directly to the structural members, and it will be difficult to adapt them to provide opening lights without undue alteration to the elevations. Further consideration is needed on the scope for adapting existing windows, and on the impacts of adaptation and replacement.

Internally the grid of columns, beams and joists forming the ceilings and floors are a key feature, and the treatment of floors and ceilings should allow this structure to be appreciated while achieving the necessary standards for insulation and fire safety. However, the drawings incorrectly identify the cross beams as steel instead of timber, and in consequence the proposal details may not achieve the standards intended. I recommend that the details of treatment of floors and ceilings be reconsidered in collaboration with the Council's Building Inspector.

Similarly the build-up of the external walls does not appear to follow published guidance, which recommends a completely breathable build-up.

There are further points on which amendment should be requested:

- the 4<sup>th</sup> bay from the north on the west elevation should be retained as existing so as to maintain the existing pattern of fenestration;
- it is not clear why the proposal includes some loss to the brick cross wall at ground floor in the centre of Block A; this is part of the original building and is of high value.

*Additions.*

The scheme includes addition of stair and service towers which allows intervention in the internal spaces and structure to be kept to a minimum. Historic aerial photographs confirm that the building's exterior has been penetrated by a variety of structures in the past. Like the new openings, these additions are of understated, contemporary design, reflecting the building's history of alterations.

*Re-building.*

Block C is a separate block put up in the 1920s-30s. It follows the overall form of the adjacent earlier blocks, but its construction is of steel frame. Its contribution to the significance of the site is considered to be limited, and capable of being sustained by the proposed replacement building.

*Impact on setting*

The immediate setting of these buildings has changed even more than the buildings themselves, and historic maps and aerial photographs show a variety of buildings and plant coming and going over the decades. Generally the listed building has been the focus of the site's intense development and activity, and the present character of the site has lost some authenticity and integrity in this respect. However, it must be acknowledged that for long periods there has been little opportunity to appreciate the architectural ambition of the west elevation, and a more open character will be better suited to new uses.

The site was probably chosen for its advantages in terms of transport. The position, orientation, layout and footprint of the main warehouse were dictated by its relationship with the navigation and the railway, resulting in a peculiarly acute angle at the south west corner. The railway and navigation are still there, along with related track and dock features on-site. It is important that these are properly recorded and retained as part of the fabric of the wider site.

Weighing harm and benefits

The proposal results in limited harm to the core element of the listed building. Its internal qualities and character will largely be respected. The treatment of windows requires further consideration.

The main source of harm to the listed building is from demolition of parts of the building which date from an important phase of development. The application identifies this as substantial harm in the terms used by NPPF 133, and proposes that retention and conversion of Blocks A and B represents a substantial public benefit. In my opinion, there is little guidance on where the line is to be drawn between substantial and significant harm, and in this instance the key points are that the most significant elements of the building are relatively unharmed, and of the elements to be removed Block H has been compromised by substantial alteration, while Blocks D and E are of relatively modest intrinsic value.

The orthodox approach to enabling development would be to increase the amount of development until the surplus would cover repair and conversion of the whole building. Since the proposal uses all available land within the site for development, this would

mean developing land beyond the site which, as the application notes, might imply greater harm as being in direct conflict with policy. However the Inspector in a recent appeal decision on an enabling development expressly included off-site development as an option warranting consideration.

The Inspector in that case also confirmed that a careful search for alternative funding from grant-giving bodies should be carried out before enabling development is proposed. This point should be addressed in the submission on viability.

Other alterations and additions to the listed building itself have low impact and are acceptable as necessary for enabling future use of the building.

Against these harms should be weighed the preservation in the long term of an important building. The value of this benefit should not be under-rated. The NPPF rates total loss of a listed building as substantial harm, and in view of the accelerating rate of deterioration over some ten years, substantial harm will foreseeably result if basic repairs are not put in hand very soon.

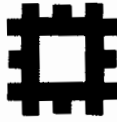
I recommend that a heritage assessment of Paper Mill House be submitted to establish the heritage value of that building, and what harm would arise from its loss. This issue aside, in my view, in heritage terms the benefits of the scheme clearly and convincingly outweigh the harm, and subject to amendment of the treatment of windows and other details I have no objection.

Conditions should include investigation and recording of the building and its surroundings, including exterior surfaces to be disturbed and ancillary buildings to be removed. The landscaping scheme should then take into account preservation of historic features of the site as appropriate.

The building should be made wind and weather-tight at an early stage, and conditions should secure a schedule of urgent works for repair and / or protection to be implemented within an agreed time-frame, so as to arrest deterioration and allow the building to dry out.

Paul Harrison  
20.2.13





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**ENGLISH HERITAGE  
EAST OF ENGLAND OFFICE**

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

MID SUFFOLK DISTRICT COUNCIL PLANNING CONTROL	Direct Dial: 01223 582721
RECEIVED	Direct Fax: 01223 582701
28 NOV 2013	Our ref: P00207852
ACKNOWLEDGED .....	
DATE .....	
PASS TO .....	25 November 2013

Dear Mr Goodyear

**Notifications under Circular 01/2001, Circular 08/2009 &  
T&CP (Development Management Procedure) Order 2010  
LAND AT THE FORMER SCOTTS/FISONS SITE, PAPER MILL LANE, BRAMFORD  
Application No 2700/12 & 2701/12**

Thank you for your letter of 11th November consulting English Heritage on revised plans and further details of the above applications. We have already accepted the principle of the elements of demolition to the grade II listed building complex which is the chief statutory remit of English Heritage in this case. We are pleased to note the reduction of height of the new access tower beside the former Fisons' warehouse as we suggested earlier and are content to leave further consideration of the detail of the new design to the Council.

We notice that since the original consultation an historic building assessment of Papemill House has been submitted. The building clearly merits the status of non-designated heritage asset, as established in the National Planning Policy Framework. We therefore recommend that it should be given due weight in consideration of the present proposals and efforts made to secure its preservation. If demolition of the building were to be accepted a condition should be set requiring its investigation and recording. In earlier advice we recommend such a condition (for both above and below ground industrial archaeology) is also placed on the main development at the former Fisons' site. We remain keen to see that implemented as well as a requirement for publication the results and the installation interpretation at the site as part of the new development.



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ENGLISH HERITAGE  
EAST OF ENGLAND OFFICE

SUFFOLK DISTRICT COUNCIL  
PLANNING CONTROL  
RECEIVED

20 NOV 2013

ACKNOWLEDGED.....  
DATE.....  
PASS TO.....

Yours sincerely

**David Eve**  
Inspector of Historic Buildings and Areas  
E-mail: david.eve@english-heritage.org.uk



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the FOIA or EIR applies.

MID SUFFOLK DISTRICT COUNCIL  
PLANNING CONTROL  
RECEIVED  
17 JAN 2013  
ACKNOWLEDGED.....  
DATE.....  
PASS TO..... Pa

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ENGLISH HERITAGE  
EAST OF ENGLAND OFFICE

Mr Peter Goodyear  
Mid Suffolk District Council  
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IP6 8DL

Direct Dial: 01223 582721  
Direct Fax: 01223 582701

Our ref: P00207852

15 January 2013

Dear Mr Goodyear

**Notifications under Circular 01/2001, Circular 08/2009 &  
T&CP (Development Management Procedure) Order 2010  
LAND AT THE FORMER SCOTTS/FISONS SITE, PAPER MILL LANE, BRAMFORD  
Application No 2700/12 & 2701/12**

Thank you for your letter of 29 November 2012 notifying us of the applications for planning permission and listed building consent relating to the above site. We do not wish to comment in detail, but offer the following general observations.

**English Heritage Advice**

The development of the former Fisons' works for housing, including the adaptation of the grade II listed former warehouse, has been the subject of pre-application discussion with English Heritage. Our chief focus of advice to the Council concerns alterations to the listed warehouse, rather than development in its setting or impact on the landscape surrounding the site, but I can confirm that I support the proposals overall as they could deliver a new use for the warehouse.

The immediate setting of the warehouse will be strongly affected by the proposed development, but the new residences closest to the listed building will allow partial views of it from the railway line and afford access to the river bank, as was the arrangement before the erection of riverside warehousing at the end of the 19<sup>th</sup> century. Because of this layout and the fact that the new buildings will be lower than the warehouse the impact of the new build will be acceptable, although the Council should ensure a high quality of materials and detailing are achieved. The same is true of the new buildings facing the end of the warehouse, which are also appropriate in scale and have a simple aesthetic not unsuited to the location.

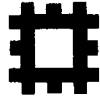
As regards proposed alterations to the listed building, the open-plan office use, the creation of an extension to contain WCs and the insertion of relatively modest staircases will reduce the amount of historic fabric lost. While the extension is a good concept, the eastern elevation suggests it will be higher than the roof of the



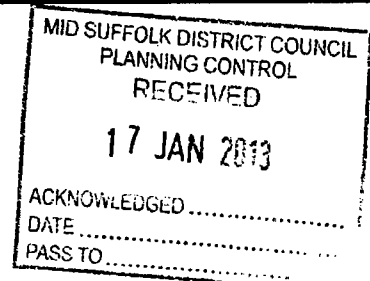
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EAST OF ENGLAND OFFICE



warehouse, yet it is not shown on the riverside elevation. Ideally the extension should not dominate the historic building in any view, so I would recommend the Council establish the true scale of this element and ascertain if it can be reduced to the height of the roof, or lower.

There are several other proposed alterations to the listed warehouse that would benefit from further amendment or justification. The proposed additional windows on the upper floors of the warehouse's east elevation will change the appearance significantly. Given the amount of fenestration on the sides of the building and the fact that the intermediate floors are to remain open-plan I would have to question if this is necessary and recommend the Council investigate removing these new windows from the scheme. The insertion of new flooring inside the building may be necessary for reasons of fire and sound control, but I would prefer to see the existing flooring retained, where possible, and overlaid with new material to achieve the necessary standards. Similarly, inserting suspended plasterboard ceilings may be necessary for reasons of fire separation, but every effort should be made to find alternative methods of achieving this and leaving the floor joists exposed. The wholesale replacement of historic windows is also not desirable. Their adaptation and the installation of secondary double glazing should be explored as an alternative. All these changes have the potential to result in harm to the significance of the historic building under paragraph 134 of the NPPF and so require clear and convincing justification (as in paragraph 132).

During pre-application discussion I commented on the heritage assessment prepared for the scheme and noted that it did not provide much information about the context of the listed warehouse in the Fison/Packard works complex or the industrial processes carried out on site. The revised assessment contains some additional information, but still does not address those issues. The development of the proposed new buildings will present an opportunity to study the archaeology of the industrial phase of the site's history (as well as earlier periods). I would therefore strongly recommend that a condition be placed on any permissions granted requiring a strategy of archaeological mitigation to be implemented that will allow recording of industrial archaeological remains below the modern hard standing and building bases found across the site. This recording should be carried out by archaeological contractors suitably experienced in industrial sites and in the context of a better understanding of the industrial processes carried out by Fison/Packard and the kind of processing facilities, etc., that might be encountered. Similarly, archaeological remains of wharfage structures should be subject to a program of archaeological work and, if appropriate, consolidated *in situ*. Appropriate recording (perhaps to the English Heritage Level 3 standard) of the historic buildings should also be carried out. The result of this whole strategy could be presented through on-site interpretation panels and, if appropriate,



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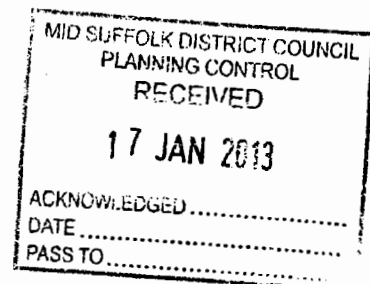
publication. I am content for the County Archaeologist to oversee the development of this strategy, but would be happy to contribute if required.

**Recommendation**

We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request.

Yours sincerely

**David Eve**  
Inspector of Historic Buildings and Areas  
E-mail: david.eve@english-heritage.org.uk



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Your Ref: MS/2700/12  
Our Ref: 570\CON\2310\12  
Date: 7 April 2014  
Enquiries to: Colin Bird  
Tel: 01473 260400  
Email: colin.bird@suffolk.gov.uk

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

**For the Attention of:** Dylan Jones

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990  
CONSULTATION RETURN MS/2700/12**

**PROPOSAL:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.

**LOCATION:** The Scotts Company (UK) Ltd, Paper Mill Lane, Bramford, Ipswich, Suffolk, IP8 4BZ

**ROAD CLASS:**

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

1

Condition: Prior to the development hereby permitted being first occupied the highway improvements and mitigation measures shall be completed in all respects and be made available for use. The works are to be laid out and completed according to the principles shown on Drawing Numbers 1678/GA/017A Sheet 1 to 7 as submitted in the Transport Assessment Addendum and Drawing Number 1678-GA-011 Rev C Sheet 1 of 6 as submitted in the original Transport

Assessment with final designs to be approved through a Section 278 Agreement. Thereafter the highway improvements shall be retained in the specified form.

Reason: To ensure that off site improvements are designed and constructed to an appropriate specification and are brought into use before any other part of the development is occupied to mitigate against the effects of development traffic, to provide sustainable travel opportunities and in the interests of highway safety.

## 2 B2

Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

## 3 D 2

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

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

## 4 ER 1

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

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

## 5 ER 2

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

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

## 6 ER 3

Condition: The new estate road junction(s) with Paper Mill Lane inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials.

Reason: To ensure a safe access to the site is provided before other works and to facilitate off street parking for site workers in the interests of highway safety.

## 7 GTP 1

Condition: Before the development hereby permitted is commenced details of the travel arrangements to and from the site for employees and customers in the form of a Travel Plan, including monitoring provisions shall be submitted to and approved in writing by the Local Planning Authority and such approved arrangements shall be implemented before the development is first brought into use and thereafter adhered to.

Reason: In the interests of sustainable development.

## 8 P 2

Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

### 9 V 3

Condition: Before the accesses are first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 4.5 metres from the nearside edge of the metalled carriageway at the centre line of the access point and a distance of 90 metres in each direction along the edge of the metalled carriageway from the centre of the access.

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 to take avoiding action.

### 10 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/](http://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.

### 11 NOTE 05

Note: Public Utility apparatus may be affected by this proposal. The appropriate utility service should be contacted to reach agreement on any necessary alterations which have to be carried out at the expense of the developer.

Those that appear to be affected are unknown.

### 12 NOTE 07

Note: The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

### 13 NOTE 09

Note: Suffolk County Council's highway apparatus appears to be affected by this proposal.

The applicant must contact the Central Area Manager, telephone 01473 341414, to agree any necessary alterations to be carried out at the expense of the developer.

Those that appear to be affected are various traffic signs and highway drainage..

### 14 NOTE 12

Note: The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01473 264929, in order to agree any necessary alterations/additions to be carried out at the expense of the developer.



**15 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.

Yours faithfully

Mr Colin Bird  
Development Management Engineer  
Highway Network Improvement Services  
Economy, Skills & Environment


**Economy, Skills and Environment**


---

The District Planning Officer  
 Mid Suffolk District Council  
 131 High Street  
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 Suffolk  
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Highway Network Improvement Services  
 Development Management  
 5th Floor, Block 1  
 Endeavour House  
 Russell Road  
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 Suffolk  
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**For the Attention of: Peter Goodyear**

Enquiries to: Colin Bird  
 Tel: 01473 260400  
 Fax: 01473 216864  
 Email: [colin.bird@suffolk.gov.uk](mailto:colin.bird@suffolk.gov.uk)  
 Web: <http://www.suffolk.gov.uk>

Your Ref: MS/2700/12  
 Our Ref: 570\CON\2310\12

Date: 16 January 2012

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990  
 CONSULTATION RETURN MS/2700/12**

**PROPOSAL: Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.**

**LOCATION: The Scotts Company (UK) Ltd, Paper Mill Lane, Bramford, Ipswich, Suffolk, IP8 4BZ**

**ROAD CLASS: C**

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

The following comments on highways issues include detailed consideration of the Transport Assessment, proposed traffic management measures and internal layout of the section of the site covered by a full application.

### **Transport Assessment (TA)**

2.3.1 – Visibility at the new accesses should be 4.5m x 90m to comply with the Design Manual for Roads and Bridges standards for a 30mph road. There should be no obstacles within this splay above 0.6m in height.

7.1.1 – Based upon what is presented in the TA it is not accepted that 8% of the trips generated by the development in the peak hour would be by foot or cycle. However, this is further discussed in the summary of highways issues below.

7.3.4 - The TA considers the level of tidal flow in the peak hours to establish whether one direction of flow is likely to be largely unopposed and, therefore, cause high speeds through the proposed traffic management system. The data shows that speeding is not likely as a result of tidal flow but this does not address the effectiveness of the proposed scheme and how it might encourage or discourage rat running

7.4 – It is for the Highways Agency to comment on the impact of the development on the A14.

7.5.3/7.5.4/7.5.5 – Notwithstanding any comments from the Highways Agency, it is accepted that the junctions assessed operate within acceptable limits when modelled with additional traffic from the development and permitted developments in the area. It is a robust assessment as the baseline traffic flows do not include trips which might realistically be generated by the existing permitted use as a factory. Also no allowance has been made for modal shift as a result of the Travel Plan. Therefore, this is considered a worst case scenario in terms of the impact of the proposed development.

7.1.10 – The TA states that the traffic management measures would reduce rat running and the figure of 20% is mentioned as a potential reduction as quoted in the Transport Advisory Leaflet TAL 2/04 “Rural traffic calming: Bird Lane, Essex”. If this is possible there should be further analysis of the alternative routes which traffic may be diverted to, and an assessment of whether this diverted traffic could cause any congestion or safety issues.

### **Traffic Calming Proposals, Paper Mill Lane Drg Nos 1678-GA-011C Sheets 2-5**

The Developer proposes changes to Paper Mill Lane to address the rat running and the lack of connectivity to the site for pedestrians, cyclists and bus users. The proposals draw on guidance from TAL 2/04. *This assesses a scheme of rural traffic calming used on Bird Lane in Essex. Bird Lane is narrow, unlit and about 900m long and was being used as a rat-run, especially during peak periods, by traffic commuting to a large office complex to the north. The scheme involved narrowing of the carriageway to 3m for 600m with passing places at approximately 60m intervals.*

The TAL for Bird Lane contains limited analysis of the after effects of this scheme and there are few other examples where similar schemes have been documented. In addition the scheme at Bird Lane has various important differences with that proposed for Paper Mill Lane.

- The Bird Lane scheme did not cater for any substantial residential developments in the area.
- The number of non-motorised users travelling along Bird Lane was very low before implementation of the scheme and it is not considered that the limited data shows any significant increase in use after implementation of the scheme.
- The Bird Lane scheme achieved reductions in speed in conjunction with a 20mph speed limit which is not proposed for Paper Mill lane. However, the mean speed remained over 25mph showing a poor level of compliance with the legal speed limit. The southern section of Paper Mill Lane is subject to a 30mph limit which extends past the proposed development. Surveys show that the 85% percentile speeds recorded in this section are approximately 40mph.
- There is limited analysis of the effect on the accident rate as a result of the Bird Lane scheme. The TAL only includes data for 1 year after scheme implementation and does not consider the accident rate on the roads where traffic was diverted.

Because of the above limitations to the TAL we require detailed consideration of the effectiveness of the proposed scheme in tackling rat running and enabling sustainable transport along Paper Mill Lane. The principle issues of concern are as follows:

The majority of the passing bays also act as shared sections of footway. This will present a danger to pedestrians as drivers will be concentrating on approaching vehicles and manoeuvring into and out of the bay and be less aware of nearby pedestrians. Dropped kerbs will be needed where pedestrians are entering a passing bay. Tactile paving, or some other indication will be needed for the visually impaired to indicate the parking bays.

The footway changes sides of Paper Mill Lane at chainage 350m. The principle of changing sides to allow the passing places to be alternated to reduce speeds in both directions is accepted. However, the footway width of 1m on the east side is well below standard and would present problems for parents with prams and the mobility impaired. The adjacent carriageway width for this section is 5m for two way traffic. Although there is no bus route and a lorry restriction (except for access) for this section of Paper Mill Lane there is potential for two large vehicles passing alongside a sub-standard footway width which would present a danger from overrunning the footway and overhanging wing mirrors.

Where the footway changes sides dropped kerbs, tactile paving and possible additional markings and signage will be needed to highlight the presence of pedestrians to motorists.

The give ways lines at chainage 350m will cause uncertainty to motorists as it is not clear who will have right of way.

Sustrans Rural Minor Road Traffic Calming (FF38) advises where a carriageway is 3m it is not possible for motorists to safely pass cyclists. They advise against providing

carriageway widths in the range 3.1m to 3.9m as this may encourage motorists to pass but still causing a safety hazard. The developer's proposals show a 3m carriageway but do not provide adequate footway width for an off road shared use facility. Therefore, the designed route that cyclists should follow will be on road and vehicles will not be able to safely overtake. However, some motorists are likely to attempt to pass cyclists rather than accept delays and this will present a safety hazard. This is more likely as kerbing is not proposed on both sides of the 3m carriageway. Overtaking is also likely to lead to verge erosion. Alternatively, less confident cyclists are likely to use the footway resulting in conflicts with pedestrians and with vehicles at the passing places.

Forward visibility appears to be below an acceptable minimum level at some points to allow reaction time to respond to an oncoming vehicle and pull into the nearest passing bay. For example, the right hand bend shown on Section 03 on Drawing No. 1678-GA-011C where vehicles in both directions will be on the right hand side of the existing carriageway. Visibility between passing spaces throughout this route needs to be established by a topographic survey. If trees or hedges at the edge of the carriageway need to be removed they may be in third party ownership. Any removal of trees or hedges must also take into account SCC's response on landscape issues given in a separate letter from our Landscape Planning Officer, dated 18 December 2012.

If visibility between the passing spaces is too low this may lead to vehicles reversing in the carriageway, as has been reported at the northern end of the TAL 2/05 Bird Lane scheme. As the vehicle flows predicted for Paper Mill Lane are higher than those reported on Bird Lane the hazards caused by vehicles reversing to the nearest passing bay are more likely to occur than experienced at the Bird Lane scheme.

Given that there is little technical documentation of the effectiveness of the proposed type of traffic calming scheme, consideration should be given to measures to slow speeds such as speed humps, as the priority system method is reliant on the vehicle flows which are liable to vary. Current 85% percentile speeds are approximately 40mph in a 30mph limit. Should the proposed scheme be introduced monitoring of flows and speeds would be required to assess the performance of the scheme.

The tapers used for the passing bays are too short to allow easy manoeuvring off the main carriageway, particularly for large vehicles, and should be increased.

No measures have been proposed to address parking within the passing bays. Parking is likely to occur at the southern end of the scheme near Hillcrest Approach where there are existing on street parking problems.

The assessment does not review the impact of carriageway reduction to 3m on agricultural and other existing users.

A safety audit and a maintenance audit (to be carried out by the Central Area Manager) will be required before the proposals for Paper Mill Lane could be accepted by SCC.

### **Traffic Calming Proposals, Paper Mill Lane Drq Nos 1678-GA-011C Sheet 6**

The TA (2.3.9) considers that addressing the existing pinch point with a major widening scheme into the Developer's land will be in conflict with the principle of the traffic management scheme proposed to the south, to discourage high speeds and rat running.

The scheme proposed would improve the existing situation by providing a footway and by formalising the give way positions. However it does not offer a significant improvement to visibility. This arrangement also may cause confusion to motorists as there is no allocated right of way to either direction of flow.

The swept paths shown on the drawing show a conflict at the give way line on the northbound plan for large vehicles which needs to be resolved.

Consideration should be given to provision of street lighting along this section of road.

A safety audit and a maintenance audit (to be carried out by the Central Area Manager) will be required before the proposals for Paper Mill Lane could be accepted by SCC.

### **Ship Lane/Paper Mill Lane Junction**

This proposal for a central island is acceptable, in principle, subject to detailed agreement of the design and safety audit.

### **Sustainable Transport Choices**

The proposal is not located to make the fullest possible use of sustainable modes and the proposed mitigation will not make this location sustainable in transport terms. This would not accord with a core principle of the National Planning Policy Framework (para. 17). This site is located where there are few facilities within a 2km walking distance from the site, apart from Bramford Primary School and a foodstore and pharmacy on The Street in Bramford. Within a 5km possible cycling distance there are two additional primary schools in Claydon and Sproughton, Westbourne High School and Claydon High School, two GP surgeries and larger stores and employment areas.

The nearest bus stops on Ship Lane are 1.4km from the site which is not an acceptable distance for passengers to walk, even if a safe path is provided. Demand Responsive Transport (DRT) is not an option as communities in the surrounding area, such as Sproughton and Bramford, are well served and it would not be sustainable to set up a service for Paper Mill Lane alone.

The proposals for Paper Mill Lane do not provide facilities to highway standards for cyclists and do not, therefore, provide a safe route.

The proposed improvements to Paper Mill lane provide a limited pedestrian facility. However, the safety of this proposal will need to be assessed by safety audit.

Therefore, at this time this authority considers sustainable transport mode links have not been adequately achieved as stated in the SCC letter dated 21 January 2012.

## **Internal Layout**

The plans for the area proposed for a full application do not show an adequate amount of detail to allow highway issues to be considered. The following issues need to be addressed:

1. No footways are shown within the development.
2. The access roads should be 5.5m wide with 2m footways.
3. The proposed footway parallel with Paper Mill Lane appears to use the internal road at the edge of the site. It is not clear if this is proposed as a shared space facility. If not a shared space, there should be a continuous footway, minimum width 2m, indicated by a label on the drawing.
4. There are no adequate turning facilities for vehicles servicing the café and retail units.
5. If delivery vehicles will be using the north access there does not appear to be adequate turning area.
6. More spaces should be provided close to the retail units to prevent parking on the access road.
7. It is not clear what area would be offered to SCC for adoption. Turning heads are needed at end of any adopted section of carriageway.
8. The drawings do not show whether the northern access will be gated. If so, and service vehicles are to use this access, the gates need to be set back by 10m.

Use of permeable paving is proposed in the northern area. This appears to be only for parking areas. Permeable paving is not currently an accepted surfacing for the areas proposed to be adopted by SCC. Further discussions will be required to establish the drainage method to be used for any areas potentially to be adopted by SCC.

Parking – Using SCC's Draft Parking Design Guide, provision for the area submitted as a full application should be 360 spaces but only 225 are provided. There will be some shared use between residential and commercial spaces but, with limited sustainable links to the site more parking should be provided. There is likely to be a conflict between parking for the 3-bed houses and the commercial units on the main entry road.

Parking provision for the area submitted as an outline application has not been checked and we will comment on this when clearly labelled plans are available.

A parking strategy will need to be submitted and approved, including numbers of parking spaces which will be dedicated, communal and for visitors, in accordance with the local standards applicable at that time. The strategy should also explain how on-street provision within the site would be managed to avoid parking in potentially hazardous locations such

as adjacent to pedestrian/cyclist crossing points, adjacent to junctions etc. and how commercial parking will be preventing from spreading into residential areas.

A Construction Management Plan will be required. No construction traffic should be routed via the south section of Paper Mill Lane.

### **Travel Plan**

Comments from our travel planner are appended to this letter.

### **Noise and Air Quality**

Our Noise and Air Quality Manager has made the following comments:

#### **Environmental Assessment Chapter 11.0 Noise and Vibration**

- Table 11.11 shows traffic flows and Predicted Changes in Noise Levels. Whilst the total flows for the daytime (0700 to 2300) and night-time (2300 to 0700) hours are shown, there is no breakdown to allow for identification of the contribution from heavy goods vehicles. There is no discussion of whether the proposed development would result in a change in HGV movements and accordingly it is not possible to verify the predicted noise level changes. Also changes in speed along Paper Mill Lane appear likely, due to the provision of traffic calming measures and passing places. This has not been identified.
- Whilst an increase in total traffic flow is shown over the night-time period, the proportion of HGVs has not been shown. The night-time period would be considered to be noise sensitive and further discussion of night-time impacts should be included, particularly if these relate to HGV movements. It is possible that the perception of change in noise level, which is stated as being of negligible significance, is not representative.
- A noise assessment of the likely impact of the proposed traffic calming measures on existing properties in Paper Mill Lane should be provided. This should include discussion of any changes in noise at the Paper Mill Lane Ship Lane Junction.
- It is difficult to identify where proposed HGV traffic will be routed during construction activities. Comment on any impacts on Paper Mill Lane residents should be included.

#### **Chapter 10 Air Quality**

With respect to potential highway authority matters, I am satisfied that the air quality assessment is adequate and have no queries.

In summary, with respect to traffic data provision, the following is required:

- a) 16 hour traffic flows (0700 to 2300) including % HGVs and speeds
- b) 8 hour traffic flows (2300 to 0700) including % HGV and speeds and identification of how this is generated and whether the flow would be equally distributed over the 8 hour period.
- c) 18 hour traffic flows (0600 to 2400) to allow quantification of overall 18 hour LA10 noise levels to allow checking for eligibility under the Noise Insulation Regulations 1975 (as



amended). Assuming that carriageway alterations would only take place at the Paper Mill Lane/Ship Lane junction, this would only be relevant at this location.

### **Conclusions**

The proposals for Paper Mill Lane, to limit significant impacts, are likely to reduce speeds and discourage rat running but the effectiveness cannot be established because of the lack of evidence relating to existing examples of similar schemes. There are also safety concerns about aspects of the scheme, in particular the combined use of passing bays by pedestrians, vehicles and cyclists.

Owing to the lack of a safe route along Paper Mill Lane, at this stage SCC could not consider that this development proposes adequate sustainable links to surrounding communities to encourage the level of sustainable travel. Safe, suitable access cannot be achieved for all people. Without safe access high car use will be anticipated.

The concerns identified will need to be assessed by safety audit and maintenance audit, and more work as referred to in relation to paragraph 7.3.4 in the TA, before the highways authority can provide further advice.

We require more detail on the site layout for the area proposed as a full application, showing footways, turning areas for deliveries etc, before further advice can be given.

A full travel plan that takes into account the comments from our travel planner below needs to be submitted at the earliest possible opportunity. The full travel plan will require an action plan, or a timetable of when certain aspects are going to be implemented. Also there needs to be a budget to successfully implement the travel plan.

With the information provided to date this authority could only object to the application based on:

- Safety concerns due to the proposed changes to the existing highway (NPPF 32);
- Lack of safe suitable access for all people (NPPF 32);
- Associated with the lack of a safe access, opportunities for sustainable transport modes cannot be maximised (NPPF 32 & 34).

Yours faithfully

Mr Colin Bird  
Development Management Engineer

**Economy, Skills and Environment**

---

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Suffolk County Council  
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Travel Planner  
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17<sup>th</sup> December 2012

Dear Colin

**Suffolk County Council response to the Old Fisons Site, Paper Mill Lane, Bramford**

Thank you for providing me the Framework Travel Plan as part of the Transport Assessment for the proposed development of the Old Fisons Site, off Paper Mill Lane in Bramford. I have had a chance to look through the Travel Plan and have made the following comments.

There are some hard measures included in the travel plan, such as the improvements to allow better cycle and pedestrian accessibility on Paper Mill Lane. However these hard measures will not work without some further soft measures to encourage residents and employees to use the improved infrastructure. Soft measures such as providing free safety equipment could help increase the numbers of people willing to change their travel behaviours. These measures must be tailored towards overcoming the specific barriers, or issues in regards to using sustainable transport to travel to and from the site.

Finally a full travel plan that takes into account the comments included in the letter needs to be submitted at the earliest possible opportunity. The full travel plan will require an action plan, or a timetable of when certain aspects are going to be implemented. Also there needs to be a budget to successfully implement 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

A handwritten signature in black ink, appearing to read "Chris Ward".

**Chris Ward**  
Travel Planner  
Suffolk County Council

**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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Your Ref: 2700/12  
Our Ref: Landscape/MSDC/Fisons  
Bramford  
Date: 31<sup>st</sup> July 2014

Dear Elizabeth,

**Proposal:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses.

Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501.

Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.

**Location:** Land at former Scotts /Fisons site, Paper Mill Lane, Bramford

**Application Number:** 2700/12 Revised information/plans

Thank you for your further consultation dated 10<sup>th</sup> July following receipt of additional information.

I have noted the further information in respect of highway works to Paper Mill Lane. I have looked at the WSP Plans 1678/GA/017B Sheets 1-11, the Barton Willmore Landscape and Visual Impact Assessment (LVIA) of the proposed changes to Paper Mill Lane, the aerial photographs Figure 1 Potential Impact of Proposals on Landscape Features and Figure 2 Potential Landscape Mitigation; all dated February 2014.

Please also refer to previous responses I sent to MSDC dated 18<sup>th</sup> December 2012 and 16<sup>th</sup> January 2014.

Paper Mill Lane is currently sandwiched between hedged banks and trees along much of its length. Occasional houses also have grassed and hedged frontages. Any widening of the carriageway will lead to impacts, mainly loss of hedge, bank and some trees with a resulting consequence for habitat and landscape features.

I make the following specific points on the latest information:

- **Figure 1** gives a good summary of impacts on the highway trees and hedges. There will be other impacts e.g. the hedge north of Grove House, the group of houses and the grass verge in front of Stockley Barn will be affected by proposed footway.
- **Figure 2** offers a broad summary of the mitigation which is proposed although I have concerns as to whether this will be feasible entirely within the highway boundary. The mitigation offered does not fully address all the impacts which will arise e.g. loss of hedge west side of land north of Grove House and the hedges frontage to the cluster of houses.
- **The LVIA report:**
  - Para 1.5 The WSP sheets 1-11 do not provide sufficient detail to clarify the full extent of highway verge and hedge which will be affected by the proposal. Some sample cross sections could give useful clarity and highlight the level changes, bank removal, re-grading, accommodating light columns and signage which will need to take place.
  - Para 2.4 Whilst there may be some management issues with the existing hedges along the lane I do not agree that they *'will not have any long term potential owing to the constrained available space'*. The hedges generally add considerable value to the locality and thrive in the space in which they are growing. The large percentage of elm present means that there will be problems with Dutch elm disease, however if properly managed the elm will continue to grow from the root structures present in the hedge bank.
  - Para 3.3 Any work here involving widening the carriageway and re-kerbing will affect the bank supporting the hedge and trees. Arboricultural supervision work will be important but will not prevent the damage resulting from removal of the hedge bank.
  - Para 3.4 The potential for planting a new hedge on top of the re-graded bank needs to be clarified here. This bank is already collapsing in places on top of the existing footway so any further re-grading should ideally result in a shallower bank up to the field. Figure 2 states hedge planting can be carried out within 60cm strip next to the road however for a new hedge to thrive and not compromise highway safety there will be need to be sufficient set back and space for growth. Some good established younger trees will be removed, space will be needed to successfully replace these.
  - Para 3.5 This states that the tree group south of the unmade track, east side of road will be partially removed. These trees appear to lie beyond the highway boundary and comprise a mix of mature trees including horse chestnut. No mitigation is proposed. I do not agree that their loss will have *'limited impact on the character of the road'*. Along with the trees at Grove House opposite (Para 3.6) they form an important group providing strong enclosing character to the lane.
  - Para 3.7 The proposed highway works will almost certainly require the excavation of the hedge banks which in my opinion is likely to result in the removal of the elm hedges. Coppicing is not likely to be feasible. This aspect still requires clarity as the BW report is unclear.
  - Para 4.2 As stated above the mitigation will only work if there is sufficient space for new hedges to be planted, set well back from the highway.
  - Para 5.0 The wider visual impacts of the highway works may in some cases be restricted by intervening features. However there will be an impact from highway lighting which without suitable enclosing planting will be more widely visible within the River Gipping valley. The local impacts of the highway works will be significant.
  - Para 6.5 A width of 60cm adjacent to the highway is insufficient for new hedgerow planting.

- Para 6.6. As stated above a width of 60cm is not sufficient for new hedges especially if planted at 2 rows. Hazel, holly, dog rose and guelder rose all require a much wider space to bulk up and thrive. Blackthorn is not suitable immediately adjacent to the highway (suckers and very thorny). The hedge mix proposed will require a minimum width of 1200mm to develop with a banked margin to the road of a minimum 60cm. Subject to space being provided a single row of hedge will provide sufficient mitigation and will be easier to manage in the longer term.
- I have some concerns over the species mix listed but planting can be detailed once the details of the highway scheme are agreed and the space for new hedge and tree planting is ascertained. Neighbouring landowners will need to be supportive of the approach taken.

**Whilst I understand that the consultants WSP and BW have endeavoured to satisfy the SCC Highways requirements I am still concerned that the impact from the work on the roadside hedges and trees will be significant. There is currently a lack of space adjacent to the highway (and within SCC ownership) to achieve a satisfactory compensatory planting scheme. The scheme as currently indicated will result in a roadscape with an unacceptable suburban appearance.**

I recommend that an approach for dealing with the landscape impact of the required highway improvements be agreed prior to determination of the planning application. If left this matter is left to be resolved as a condition there are likely to be problems in achieving a satisfactory highway and landscape solution. There will also be understandable concerns from local residents.

Details for external works and hard and soft landscape for the development site can be controlled by conditions and reserved matters on the full and outline applications respectively and if approved. I support the proposal to create a hedged frontage to the new housing area and this can be planned in more detail and controlled by reserved matters.

Please let me know if you have any queries relating to this letter.

Yours sincerely

**Anne Westover BA Dip LA CMLI**  
Landscape Planning Officer

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Your Ref: 2700/12  
Our Ref: Landscape/MSDC/Fisons  
Bramford  
Date: 16<sup>th</sup> January 2014

Dear Ian,

**Proposal:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses.  
Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501.  
Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.

**Location:** Land at former Scotts /Fisons site, Paper Mill Lane, Bramford

**Application Number:** 2700/12 Revised information/plans

Thank you for the further consultation dated 11<sup>th</sup> November 2013. I have looked at the revised Documentation including the Transport Assessment Addendum in relation to Paper Mill Lane, the summary of consultation responses, the amended LVIA and the Figure 7.6. I have had contact with Lucy Wood of Barton Wilmore relating to Paper Mill Lane and impact of the proposed improvements on the landscape setting of the road.

The response I sent to MSDC Peter Goodyear dated 18<sup>th</sup> December 2012 is still relevant although some elements of the scheme have been refined in response to consultee comments.

The development site frontage offers opportunities to enhance the Paper Mill Lane environment. The housing element of the application south of the retained buildings is in outline form so there will be scope to determine a road frontage scheme that provides visual improvements to the road and its setting.

I consider it appropriate to ensure that a contrast in roadside design detailing is achieved between the new housing area covered by the Outline application and the more historic part of the site. The latter comprises walls and trees with a more suitable urban character. The new housing area could create a softer edge more appropriate to the changing character of the lane. Figure 7.6 Landscape Strategy Plan is unclear in terms of information relating to the landscape approach but the related text Para 7.152 (ESS) describes a 5-7m wide verge with tree planting. Parallel estate roadside parking and lighting will need to be sufficiently screened by planting and/or boundary detailing to ensure that the visual impact on the roadside character is mitigated. I would recommend a combination of hedges/fences and walls could be used to ensure that an appropriate rural edge character and screening to the lane is achieved.

### **Paper Mill Lane**

There is a requirement by SCC Highways for the inclusion of a new footway on the west side of Paper Mill Lane linking the development with the public footpath (No 22) heading across the Gipping valley. From this point there is a stretch of road, approximately 50 metres length in the vicinity of Grove House with no footway and none proposed. The existing narrow footway on the east side of the road commences south of a soiled access track and runs through to Bramford village. The highway changes to design are described in the Transport Assessment addendum dated August 2013. The scheme details are illustrated by WSP Group (Sheets 1-41678/GA/016B).

Much of the length of Paper Mill Lane between the site and the village is enclosed by roadside banks with hedges growing on these. Where houses exist along the west side of the lane, north of Grove House, there are garden boundary hedges and trees. These landscape elements and details have not been illustrated on the WSP plans. The detailed impact and loss of hedge has not been assessed or illustrated. The cross sections (Sheet 4) inaccurately show the road section to be flat and without hedge banks.

Much of the field hedging is elm and is of mixed quality being partially affected by Dutch elm disease. However the hedges are visually important in creating a rural and enclosing character to the lane. They will also have some wildlife and habitat value which does not appear to have been assessed.

The field hedges fall within the scope of the 1997 Hedgerows Regulations and their 'importance' in terms of the regulations should also be assessed. It should be noted that if Planning Permission for the works proposed is consented then a separate notice to remove hedges would not normally be required by the LPA. However as the current application drawings do not specify the hedgerow removal needed in sufficient detail further information will be required to deal with this procedure and negate the need for a removal notification under the Regulations.

The highway ownership marked on the WSP plans by a red line indicates a zone of between 5 - 7 metres wide. The highway improvements will require between 6.3m and 6.9m width in total. The embankments and hedges on either side of the road will be disturbed by excavation work to facilitate the introduction of lighting columns, kerbing and concrete haunching. Those hedges growing on the west side of the road will need to be removed as they fall within the extra width needed to facilitate the work. The mixed trimmed hedges, and one large holly tree, running along the fronts of the properties north of Grove House will be damaged and possibly removed by the work proposed.

The proposal to cut back the verge on the east side of the road south of Grove House to create a wider footway will be problematical. This footway is restricted in width by the steep vegetated bank containing young and mature trees and the telegraph poles located along the lower edge of the bank. Cutting back of the bank will place some trees at risk of collapse and decline and as a result the character of the lane could be compromised.

These highway landscape matters need to be fully detailed with appropriate replacement hedge and tree planting included in the scheme. If mitigation is not achieved then the landscape quality of the lane will be significantly compromised by the highway works. Whilst improvements are needed to deal with the matter of road safety there should also be an agreed landscape strategy (including a mechanism for implementation and management) to deal with the longer term landscape setting of the road.

The loss of hedgerow vegetation will have a local landscape impact and will also impact on the wider views across the Gipping valley. There is a risk of the road traffic and highway lighting becoming more prominent in the view. As part of a landscape strategy replacement hedge and/or tree planting will need to be placed beyond the highway boundary in privately owned land. This will require both liaison and agreement with neighbouring landowners to ensure an effective and implementable scheme is devised.

I recommend that an approach for dealing with the landscape impact of the required highway improvements be agreed prior to determination of the planning application.

Details for external works and hard and soft landscape for the development site can be controlled by conditions and reserved matters on the full and outline applications respectively and if approved. Timetables for implementation and details for longer term management of both landscape and open space areas will need to be agreed and included in a legal agreement.

Please let me know if you have any queries relating to this letter or require any further advice regarding landscape design matters please let me know.

Yours sincerely

**Anne Westover BA Dip LA CMLI**  
Landscape Planning Officer



## NOT PROTECTIVELY MARKED

Your ref: 2700/12  
 Our ref: Paper Mill Lane  
 Date: 10 January 2013  
 Enquiries to: James Cutting  
 Tel: 01473 264803  
 Email: [james.cutting@suffolk.gov.uk](mailto:james.cutting@suffolk.gov.uk)



Mr Ian Ward,  
 Senior Development Management  
 Planning Officer,  
 Mid Suffolk District Council  
 Council Offices,  
 131 High Street,  
 Needham Market,  
 Suffolk, IP6 8DL

Dear Mr Ward,

**Land at the former Scotts/Fisons Site, Paper Mill Lane, Bramford**

I refer to planning application reference 2700/12 for the redevelopment at Paper Mill Lane, Bramford, and to Suffolk County Council responses by myself and Neil McManus dated 21 December 2012.

Suffolk County Council's position remains that, whilst the principle of regenerating the site is supported, its relatively remote location means that every effort must be employed to ensure that this is sustainable development, compliant with the National Planning Policy Framework. In particular, from the county council's service perspective, this would include the provision of routes to facilitate sustainable travel and contributions to education.

In light of discussions the highway alterations to Paper Mill Lane, the extent of the county council's own requirements has been reviewed. Contributions towards improving libraries and strategic waste disposal are no longer being sought. The viability assessment should be updated to reflect the chances to the development as well as more favourable market signals.

*Education Contributions*

The level of education contributions that are necessary to provide additional capacity, particularly at Bramford CEVCP School, have been reassessed and are based on the following revision to the number of residential properties:

Flats	No	Houses	No	Total
1B	23	2B	21	
2B	40	3B	55	
3B	1	4B	32	
	64		108	172

**NOT PROTECTIVELY MARKED**

The additional dwellings will increase the overall stock within any given area, including the catchment area of a school. The anticipated pupil yield from the development of 108 houses and 64 flats (the 23 1-bed flats being excluded) is:

- Pre-school age range, 2-4: up to 13 pupils.
- Primary school age range, 5-11: 34 pupils.
- Secondary school age range, 11-16: 20 pupils.
- Secondary school age range, 16+: 4 pupils.

Ordinarily, Suffolk County Councils would request a capital contribution of 13 x £6,091 = **£79,183** (2013/14 costs) to spend on enhancing existing local early years provision. However, in view of the strategic nature of this application, an alternative is through onsite provision within the commercial element of the application. The response to the consultation (dated September 2013) dismissed the financial contributions but did not address the possibility of on-site provision.

The local catchment schools are Bramford CEVCP School, Claydon High School and Suffolk One. Current forecasts are for there to be sufficient places available at the catchment secondary and sixth form schools to accommodate the proposed development.

*Pupil Forecasts (without development)*

Bramford CEVCP School	210	0	210	195	180	180	189	189
			0					
Claydon High School	725	0	725	687	683	675	673	664
			0					
Suffolk One	2,000	0	2,000	1359	1429	1419	1413	1398

The calculation of developer contributions is based on 95% of total capacity; schools should not operate at full capacity but not have more than 10% surplus spaces. Based on the completion of development in 2018, the resultant requirement is:

- 23 primary age children x cost per place of £12,181 = £280,163 total contribution.

In terms of primary school provision, the county council require capital contributions to provide additional facilities for up to 23 pupils arising at a cost of **£280,163** (2013/14 costs), this equates to £1,629 per dwelling proposed.

The above amounts remain valid for six months after which a reappraisal will be required. Circumstances might change, such as the capacity of local schools, that resultant in a different level of contribution.

*Sustainable Transport and Rights of Way*

The provision of safe and accessible routes for pedestrians and cyclists is an important part of the development, a point acknowledged in the Transport Assessment (para.3.2.1).

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Whilst there has been some progress in working towards an agreed approach to Paper Mill Lane, the improvements to the rights of way network – which are necessary to connect the site to the village – will also need to be detailed and agreed. The consultation report (September 2013) does confirm agreement to a condition of planning permission but this would only address the rights of way within the site. Improvements would also be needed beyond the site boundary, such as at Bushman's Bridge and FP22 from Grove House, as was previously set out. The precise specification, obligations and cost of improvements would need to be agreed and then included in a s.106 agreement.

Whilst this route would be shorter for accessing some local services, the likelihood of flooding needs to be taken into account, particularly in the provision of safe access to school. This reinforces the need for a safe route along Paper Mill Lane to Gables Corner, a point which remains part of the application (ES, 4.16a).

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Contributions to mitigate the impact of the development on local education services and to ensure that the rights of way are able to provide safe and accessible routes for pedestrians and cyclists are critical components. Without these, and pending formal comments as a Highway Authority, Suffolk County Council would object to the development.

I hope this provides you with an accurate and updated account and look forward to agreeing the above details.

Yours sincerely,

James Cutting  
Planning Strategy Manager

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Economy, Skills and Environment

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Your ref: 2700/12  
Our ref: Bramford – Old Fisons site,  
Paper Mill Lane  
Date: 21 December 2012

Dear Peter,

**Bramford – Old Fisons site Paper Mill Lane – 2700/12 – developer contributions**

I refer to the above planning application. I previously provided a pre-application response in my letter dated 4 April 2012, which was in connection with the public consultation exercise. At the time of that consultation it was proposed to deliver a scheme of 150 dwellings, which has since been increased to 176 dwellings in the planning application. Please note that a spatial planning response is also being made and this response should be considered alongside that one.

I have seen a copy of the detailed viability appraisal which seems to suggest that affordable housing and Section 106 contributions may not be deliverable to full policy compliance. I would welcome the opportunity to jointly work with officers from Mid Suffolk on the viability assumptions in order to fully understand the implications.

I set out below Suffolk County Council's corporate view, which provides our infrastructure requirements associated with a scheme of 176 dwellings and employment uses on this site, which need to be taken into account by Mid Suffolk District Council in their capacity as the local planning authority. The county council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

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/>

The key requirements of planning obligations as set out in the National Planning Policy Framework (NPPF) are that they must be:

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- 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.

1. **Education.** We would anticipate the following **minimum** pupil yields from a development of up to 176 dwellings, namely:
  - a. Primary school age range, 5-11: 34 pupils. Cost per place is £12,021 (2012/13 costs).
  - b. Secondary age range, 11-16: 20 pupils. Cost per place is £18,114 (2012/13 costs).
  - c. Secondary age range, 16+: 4 pupils. Cost per place is £19,645 (2012/13 costs).

The local catchment schools are Bramford CEVCP School, Claydon High School and Suffolk One. There are currently forecast to be some surplus places available at the catchment primary and secondary schools serving the development, which will reduce the number of additional school places we will require to mitigate impacts. **In terms of primary school provision we require capital contributions to provide additional facilities for up to 13 pupils arising at a cost of £158,353 (2012/13 costs). In terms of secondary school provision (ages 11-16) we require capital contributions for up to 14 pupils arising at a cost of £256,970 (2012/13 costs). This is a total capital contribution of £415,323 (2012/13 costs).** As this is an outline application this equates to a contribution of £2,360 per dwelling (2012/13 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 2012-13 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 a Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the S106 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 local education provision.

Clearly, local circumstances may change over time and I would draw your attention to paragraph 17 where this information is time-limited.

2. **Early years and childcare provision.** 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. This means pre-school provision is now not just a market provided facility. From these development proposals we would anticipate up to 13 pre-school pupils at a cost of £6,091 per

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place. We would request a minimum capital contribution of £79,183 (2012/13 costs). Alternatively a contribution towards pre-school places could, instead, be provided through the commercial element of the application and the county council would welcome the opportunity to discuss the potential for a pre-school to be part of the development.

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.** 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. This will be coordinated by Suffolk County Council FAO Carol Grimsey.
5. **Public rights of way.** Financial contributions or other obligations will be required towards the improvements to the public right of way network that are necessary to mitigate the effects of the development and to maximise sustainable modes of travel. In addition, a contribution or programme of maintenance would be required for the new footpath and cycleway. The extent of the obligations and contributions will need to be determined in conjunction with the determination of the application.
6. **Libraries.** The capital contribution towards libraries arising from this scheme may be £38,016, which would be spent at the local catchment library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of  $(30 \times £3,000) = £90,000$  per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.
7. **Waste.** A waste minimisation and recycling strategy needs to be agreed and implemented by planning conditions. We would also request a contribution of £97 per dwelling as a contribution towards strategic waste disposal infrastructure i.e. based on 176 dwellings this would be a capital contribution of £17,072.
8. **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

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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.

9. We would like to see the following principles adopted for the management and enhancement of the land west of the railway line. There is good network of public rights of way across the land that link into the Gipping Valley River Path and make the site of high public amenity value. There is a spur higher drier land that lends itself to public access and lower ground in the valley floor that has the high potential for wetland habitat restoration. This is an important site in the Gipping valley next to Bramford Meadows Local Nature Reserve which is now managed by the Suffolk Wildlife trust. There is therefore an opportunity to improve both the quality of wetland habitat and ecological connectivity through the restoration of old watercourses, and better management of water levels within the valley floor. A scheme of management and enhancement should be prepared that enhances public amenity benefits and wildlife habitats and also helps contribute to meeting Water Framework Directive Targets.

- 10. Sustainable Drainage Systems.** 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.

- 11. Suffolk Constabulary.** An assessment of the likely impact of the development proposals on Suffolk Constabulary infrastructure facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with Suffolk Constabulary or its agent Lawson Planning Partnership Ltd (LPP). LPP's contact details are [jameslawson@lppartnership.co.uk](mailto:jameslawson@lppartnership.co.uk) (telephone: 01206 835150).

- 12. Suffolk PCT.** An assessment of the likely impact of the development proposals on Suffolk PCT infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with its agent Lawson Planning Partnership Ltd.

- 13. Fire Service.** Any fire hydrant and associated infrastructure issues will need to be covered by appropriate planning conditions. We would recommend the installation of sprinklers.

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- 14. 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.
- 15. Archaeology.** An issue that may need to be addressed.
- 16. Legal costs.** SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.
- 17.** The above information is time-limited for 6 months only from the date of this letter.

I trust that the above information is helpful and will be supported by Mid Suffolk District Council. I am happy to discuss further.

Yours sincerely,



**Neil McManus**  
Planning Obligations Manager

cc Carol Grimsey, Suffolk County Council  
Iain Maxwell, Suffolk County Council  
Jeff Horner, Suffolk County Council



**PLANNING CONSULTATION RESPONSE****COMMUNITIES OFFICER (SPORT)****OPEN SPACE, SPORT AND RECREATION STRATEGY****2700/12 – BRAMFORD****1. Policy background.**

- 1.1 In 2006 a Leisure Consultant was commissioned by Mid Suffolk District Council to undertake an Open Space, Sport and Recreation needs assessment. This Needs Assessment, along with Consultation Statement and Sustainability Appraisal were adopted by MSDC in October 2006 (Executive summary attached). This study has been used to assist the Council in its approach to plan for future provision and the protection of sports and play facilities across the District. This assessment has been a key document feeding into the production of the Local Development Framework. In particular the policies covering developers contributions to facility development.
- 1.2 The above documents provided the evidence base for the Council's adopted Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation (implemented February 2007). It provides details of the required facilities under each of the categories for which developer contributions are required.
- 1.3 As a result of the above an 'Open Space, Sport and Recreation Strategy' has been adopted informing the Council of the districts current and future needs up until 2021. This strategy is a working document, which is continually monitored and updated.
- 1.4 This Strategy, as a result of significant community consultation, provides the Council with a clear indication of where new open space, sport and recreation facilities are needed in Mid Suffolk from 2007.
- 1.5 The Strategy is in accordance with the Council's adopted Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation (reported to Environmental Policy Panel February 2006 and adopted in October 2006 and implemented in February 2007).
- 1.6 Consultation responses will demonstrate a clear linkage between the contribution sought and the development proposed, providing up-to-date information which meets the statutory tests set out in regulations 122 and 123 of the CIL Regulations 2010.

**2. 2700/12 – Bramford**

- 2.1 The contribution for 176no detached dwellings in accordance with the Council's adopted Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation is unknown at this stage due to the outline form of the application. The Section 106 should reflect this with the standard wording for outline applications.

**3. Justification of Need**

- 3.1 The Open Space, Sport and Recreation Strategy recognises the need to improve existing village hall facilities in the ward of Bramford and Blakenham, which includes the Parishes of Bramford, Great Blakenham, Little Blakenham and Flowton. The Lorraine Victory Hall (Village Hall) in Bramford has recently been upgraded and re-furbished but funding is still being sought to upgrade and re-furbish the toilets in the hall. The need for this work and future improvements will be exacerbated by new residents making use of the facilities. Great Blakenham Parish Rooms have been improved but the village hall requires work to enable it to accommodate recent and up-coming residential growth.

Bramford have Tennis Courts and both Bramford and Great Blakenham have Bowls Greens which will require work in the future to cope with the growing demand for the usage of these facilities through new development. Bramford Bowls Club are currently seeking funding for Green improvements to replace the 'ditch' surrounding the green and to re-fill with a rubber compound. They are also in need of funding to buy new equipment e.g. mower etc to maintain the green. The Tennis Club are seeking funding to install floodlighting as this is one of the only ways they can improve capacity now. Both the Tennis and Bowls Clubs in Bramford are struggling to accommodate new players because they currently rely on changing facilities in a portacabin which needs to be replaced / enlarged to enable more use.

Bramford Football Club have recently renewed fencing and have just upgraded their changing facilities. Their biggest on-going problem is to maintain the pitches. In terms of accommodating growth within the club, they need to increase and improve their floodlighting on the training pitch so that it can be used by more teams.

Major new sports facilities are planned for Stowmarket in the evolving Stowmarket Area Action Plan. Contributions from across the district are being pooled to assist with the financial provision of these new facilities. There is a project to create a dual-use facility at Claydon High School to make the sports hall and other facilities available to the community on a shared basis. This will require significant funding to provide new accesses, reception area etc. The costs of this provision will largely be met through external funding sources, grant providers etc....but as with other facilities, more people will increase the costs of provision, so it is justifiable to collect a contribution towards sports halls and other facilities.

The swimming pool at Stowmarket will serve the needs of residents in Bramford (accepting that some will use other facilities in other towns depending on where they work, etc) requires replacement in the medium term and funds are being collected for this purpose.

Six strategic Multi-use games Areas (with floodlighting) are proposed based on a sub-district basis. There are plans to provide such a facility at Claydon or Barham, which are within the Bramford sub-district area. The Multi-Use Games area in Bramford needs to be fenced as currently there is not any.

There are plans to provide a new set of pitches (including a synthetic turf pitch) for junior football at the old picnic site in Barham. This is in the catchment area for Bramford and the local young people would be likely to use these facilities.

It is essential that these facilities are maintained and improved otherwise there would be question marks about the sustainability of the location within the Settlement Hierarchy adopted under the Core Strategy.

There are dedicated accounts to enable contributions to be accumulated to enable the above developments and improvements to be made.

## **EXECUTIVE SUMMARY (extracts from the Needs Assessment)**

### **Playing pitches and other outdoor facilities**

- **Football** - By 2021 there is an estimated requirement for 119 football pitches, comprising 60 senior and youth pitches, 37 junior and 22 mini over the whole district. There is thus a projected shortfall of 26 pitches overall, comprising 27 junior and 2 mini. This can be alleviated by means of new pitch provision in appropriate locations, improvements to existing pitches to ensure more intensive or by bringing school pitches into secured community use.

- **Cricket** - Three additional cricket pitches can be justified to meet future needs, probably in the Stowmarket, Needham Market and Woolpit areas, giving a future pitch requirement of 21 in total. Some pitch and facility improvements are also required throughout the district.
- **Rugby Union** - Pitch provision for rugby union requires 6 pitches in total by 2021, or the equivalent of 2 additional pitches, to be located in Stowmarket, preferably in conjunction with the existing club, and some improvements to ancillary facilities are required.
- **Hockey** - One additional STP capable of accommodating hockey is required up to 2021 in the Stowmarket area, possibly in conjunction with a school site. Significant refurbishment and improvements are necessary to the existing hockey facilities at Weybread.
- **Bowls** - No additional bowls greens are required up to 2012, as the potential demand from the increasing and ageing population is likely to be met at existing greens and clubs. However quality improvements, including the possibility of enhancement of some greens to an all weather surface, are required. All existing greens should be retained to meet additional local need, and development programmes actively promoted, particularly among younger people.
- **Tennis** - To allow clubs to develop juniors, accommodate additional adult members and meet LTA priorities, a further 10 courts are required at existing clubs to 2021. All existing courts should be retained and where necessary improved and renovated, to permit recreational tennis and allow any casual play generated.
- **Netball** - Changes in demand for additional facilities for netball are unlikely to be significant, but any new facilities required should be provided in conjunction with a network on new FMGAs. No new courts specifically for netball are therefore considered necessary. Some minor quality improvements to existing courts and ancillary facilities are required.
- **FMGAs** - New 2 court FMGAs can be justified in 6 additional locations in the main towns and villages, and single courts should be provided in 9 further smaller villages, and improvements to some existing facilities implemented.

### **Informal recreation space**

- The precise demand for casual informal recreational space in the future is difficult to predict accurately and the future standard based on existing provision throughout the district of 0.6 ha. per 1000 population is proposed. Meaningful provision of informal recreation space requires an area of at least 0.2 has, and it is likely that a development of 300 houses would be necessary to require on-site provision. In most cases therefore, accessible off-site provision is therefore more appropriate, though consideration should be given to the enhancement of existing areas as an alternative to new provision.

### **Play facilities**

- **TOPS and JOPs**: The priorities for new junior and toddlers play facilities are the main settlements of Stowmarket and Needham Market, together with Bacton, Bramford, Claydon and Barham, Elmswell, Eye, Haughley, Thurston, Walsham le Willows and Woolpit..
- **YOPS**: The following settlements are large enough to justify at least one YOP but have no such provision currently: Bacton, Barham, Bramford, Claydon, Debenham, Elmswell, Gt Blakenham, Mendlesham, Stradbroke and Thurston, and enhanced provision should be made in Stowmarket and Needham Market.

### **Built facilities**

- **Sports halls** - by 2021, 7 sports halls, comprising 28 courts, should be available throughout the district to meet the needs of the wider community. These should be located to satisfy

demand from existing and future centres of population. A number of possible options are available to meet these requirements:

- A replacement 6 court hall in Stowmarket or the addition of 2 courts at the existing Mid Suffolk Leisure Centre
- Formal community use of the five existing halls on High School sites, including any necessary alterations and extensions to encourage and facilitate community use
- Development of one/two court halls in 2 strategic locations in the rural areas.

In addition, it must be acknowledged that all the existing centres, which for the most part were built in the 1970s and 80s, will be coming to the end of their useful life by 2021 and will require at the very least significant refurbishment.

- **Swimming pools** – the apparent existing shortfall, coupled with significant population growth in the district, mainly in the larger settlements, suggests that further swimming provision could be justified, subject to more detailed feasibility. A number of options include:
  - Additional water space in Stowmarket, including the replacement of the existing pool by a larger facility
  - One or two new small community pools in strategic locations in the rural parts of the district (e.g. in the west), the A14 corridor (e.g. Needham Market/Claydon or Elmswell) or in conjunction with existing sports facilities on high school sites (e.g. Thurston), subject to formal Community Use Agreements

In addition, as with sports centres, the two existing pools will in any case require significant refurbishment by 2021 because of age, deterioration and changing demands.

- **Indoor bowls** - there are sufficient facilities in Mid Suffolk for indoor bowls now and up to 2021, although a growing and ageing population will increase demand and impose pressures on existing facilities, and there is no allowance made for any development initiatives planned by the centres and governing bodies which could stimulate participation. Over the timescale envisaged there will also be a need to consider refurbishment of both bowls centres.

- **STPs** - in accordance with a local standard of one STP per 30,000 population in Mid Suffolk, there is a shortfall of up to two STPs in the district. The options for future provision therefore include:

- The provision of an additional STP in the Stowmarket area
- The possibility, subject to a more detailed feasibility study, of one further STP on a high school site in conjunction with existing sports facilities, and the establishment of a formally adopted Community Use Agreements.

By 2021 (and indeed well in advance of this) significant refurbishment of the existing STPs at Weybread, including the short-term replacement of the existing sand filled surface, will be necessary.

- **Village/community halls.** Current provision of village halls and community centres in the district is estimated at about 1 hall per 1000 population or the equivalent of 150m<sup>2</sup> per 1000 population. This standard should be adopted for future provision, and used primarily to effect improvements to existing facilities to enable sport and recreation to take place in villages, though new provision might be justified in larger developments.

#### **Future standards of provision**

Future provision of sports and play facilities should be made in accordance with the following standards.

<b>Table 1</b>	
Playing pitches	1.6 ha/1000
Other outdoor sport	0.12 ha/1000
FMGAs	0.04 ha/1000
All outdoor sport	1.76 ha/1000
Informal recreation space	0.6 ha/1000

Play	0.2 ha/1000
Sports halls	0.26 courts/1000
Swimming pools	9.18 m <sup>2</sup> /1000
STPs	0.03 pitches/1000
Village/community halls	150 m <sup>2</sup> /1000

**Changes made to tables 2 and 3 of the SPD to account for inflationary increases  
2010/11**

<b>Individual dwellings and up to 9 dwellings will contribute to:-</b>			
	<b>M<sup>2</sup> per person</b>	<b>Provision cost £ per m<sup>2</sup></b>	<b>Contribution cost: £ per person</b>
Village Halls and Community Centre	0.15	1,893	284
Swimming pools	0.00919	10,446	96
Sports Halls	0.0395	4,557	180
Outdoor other sports pitches (including tennis, bowls, netball and FMGA)	1.6	84.4	135
STP	0.18	122.2	22
<b>TOTAL CONTRIBUTION PER PERSON</b>			<b>717</b>

The table below shows the additional contributions required per person for developments of 10 or more dwellings (these will be combined with the table above):

<b>Ten or more dwellings will also contribute to :-</b>			
	<b>M<sup>2</sup> per person</b>	<b>Provision cost £ per m<sup>2</sup></b>	<b>Contribution cost £ per person</b>
Play Areas	2.0	159.5	319
Outdoor Pitches (Football, Cricket, Rugby, Hockey)	16.0	43.6	697
Informal recreation space	6.0	17	102
<b>ADDITIONAL CONTRIBUTION PER PERSON</b>			<b>1118</b>

<b>Community Facilities, Open Space, Sport and Recreation Contributions</b>			
<b>Category</b>	<b>m<sup>2</sup> per person</b>	<b>Provision cost: £ per m<sup>2</sup></b>	<b>Contribution cost: £ per person</b>
Outdoor pitches	16.0	43.6	697
Outdoor other sports facilities	1.6	84.4	135
Children's Play	2.0	159.5	319
Village halls and community centres	0.15	1,893	284
Swimming pools	0.00919	10,446	96
Sports halls	0.0395	4,557	180
STP	0.18	122.2	22
Informal recreation space	6.0	17	102
<b>TOTAL CONTRIBUTION PER PERSON FOR DEVELOPMENTS OF MORE THAN 10 DWELLINGS</b>			<b>1835</b>



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

*aarti@lpppartnership.co.uk*

*Tel 01206 835150*

Co. Reg. No. 5677777

21<sup>st</sup> December 2012

Dear Peter

**Planning Application (reference 2700/12) by Paper Mill Lane Properties Ltd for a Mixed-Use Development, Including 176 Residential Dwellings on Land at the former Scotts/ Fisons Site, Paper Mill Lane, Bramford – Consultation Response on Behalf of NHS Suffolk**

I refer to your consultation letter on the above planning application, dated 29<sup>th</sup> November 2012, and advise that following a review of the applicant's submission, including the Planning Statement, Environmental Statement and Draft Section 106 Heads of Terms, NHS Suffolk (NHSS) wishes to raise a ' **Holding Objection** ' to the application for the reasons outlined below.

The proposal is for a mixed-use development, including 176 dwellings, which is likely to have a significant impact on the NHSS funding programme for the delivery of healthcare provision within its area and specifically within the health catchment area of the development. NHSS 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**

It is noted that the applicant has included an assessment of the likely impacts on healthcare provision arising from the proposed development within the Environmental Statement Socio-Economic chapter. However, the use of historic patient list sizes and the total number of GPs (irrespective of their working hours) does not accurately reflect the baseline healthcare capacity position for the catchment GP surgeries.

In addition, the acceptance of new patients by the catchment surgeries is not evidence of their capacity, as surgeries are obliged to accept new patients irrespective of clinical capacity unless express permission to 'close the list' is granted by NHSS. This perceived capacity of the catchment GP surgeries is not based on evidence and does not represent the true baseline capacity position.

Therefore, the applicant's conclusion that there would be a "*long term, permanent negligible effect on GP provision*" is not accurate or robust, and the exclusion of a developer contribution to mitigate the healthcare impacts of the proposed development is inappropriate. Consequently, NHSS objects

**Managing Director:**  
 John Lawson, BA(Hons) MPhil MRTPI  
**Director:**  
 James Lawson, BA(Hons) MA MRTPI  
**Technical Director:**  
 Zac Ellwood, BA(Hons) DipTP

**Associate Director:**  
 Sharon Lawson, BA(Hons) DipTP MRTPI  
**Senior Planner:**  
 Aarti O'Leary, BA(Hons) MA MRTPI  
**Trainee Planner:**  
 Natalie Garrish, BA(Hons) DipLaw/CPE

**Consultant:**  
 Rod Lay, Dip EP CP Cert UD MRTPI  
**882 The Crescent, Colchester Business Park, Colchester, Essex, CO4 9YQ**  
 www.lpppartnership.co.uk

to the proposed development on the grounds that the applicant has not validly assessed the likely healthcare impacts of the proposed development and has not provided for appropriate mitigation of these impacts.

In order to accurately scope the requirement for necessary social infrastructure, a Health Impact Assessment (HIA) has been prepared by NHSS in order to provide the basis for a developer contribution towards capital funding to increase capacity within the GP catchment area.

### Health Impact Assessment

#### The Capital Funding Implications of the Proposed Development

The HIA methodology for assessing the health care 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, which is therefore extended to 2.5km.

Table 1 below, therefore, provides a summary of the capacity position for the nearest GP catchment practices 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 and/or related facilities. A GP Catchment Practices Plan to identify the location of the GP practices serving the development proposal is *attached* to this consultation response.

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

Premises	List Size (01.10.12)	No. GPs (WTE)	Capacity <sup>1</sup>	Spare Capacity <sup>2</sup>	Additional Population Growth (176 homes) <sup>3</sup>	Additional GPs Required to Meet Growth <sup>4</sup>	Additional Floorspace Required to Meet Growth <sup>5</sup>	Capital Required to Create Additional Floorspace <sup>6</sup>
Chesterfield Drive Surgery, Ipswich, IP1 6DW	10,644	4.6	8,280	-2,364	200	0.11	14.3	£28,600
Deben Road Surgery, Ipswich, IP1 5EN	7,897	4.25	7,650	-247	200	0.11	14.3	£28,600
<b>Total</b>	<b>18,541</b>	<b>9</b>	<b>15,930</b>	<b>-2,611</b>	<b>400</b>	<b>0.22</b>	<b>28.6</b>	<b>£57,200</b>

**Notes:**

1. Based on optimum list size of 1,800 patients per GP.
2. Based on list size as at 1<sup>st</sup> October 2012.
3. Taken from application documents.
4. Additional growth divided by optimum list size.
5. Based on 130m<sup>2</sup> floorspace per GP x additional GPs required to meet growth.
6. Based on standard m<sup>2</sup> cost multiplier for primary healthcare facilities in the East Anglia Region from the BCIS Q3 2012 Price Index, adjusted for professional fees, fit out and contingency budget (£2,000/ m<sup>2</sup>), rounded to nearest £.

As shown in Table 1 there is an overall capacity deficit in the catchment surgeries and a developer contribution of £57,200 is sought to mitigate the 'capital cost' to NHSS for the provision of additional healthcare services arising directly as a result of the development proposals.

NHSS 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 **£57,200** is sought which would be payable on commencement of the development. This would be used to build further capacity into the catchment surgeries.

NHSS 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 in Section 122 of the CIL Regulations, which require the obligation to 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.

### **Conclusion**

In conclusion, NHSS raises a holding objection on the grounds that the applicant has not validly 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:

- Policies SS1, SS2 and IMP1 of the East of England Plan (2008); and,
- 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 and other material considerations set out in the NPPF (with its presumption in 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, NHSS would be content to lift its objection in the event that an appropriate level of mitigation is provided through a Section 106 Agreement. In this respect it is considered that a developer contribution of £57,200 would fairly and reasonably address the identified healthcare impacts.





Peter Goodyear

4

21st December 2012

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NHSS looks forward to working with the applicant and District Council to satisfactorily address the issues raised in this consultation response, and would appreciate acknowledgement of the safe receipt of this letter.

Yours sincerely

(sent electronically)

**Lawson Planning Partnership Ltd**

Proposed Redevelopment of Former Fisons Site (Application Ref: 2700/12) - Further Consultation  
Response on Behalf of NHS Suffolk

Thank you for consulting NHS Property Services Ltd (NHSPS) on the amendments to the above planning application, which include a reduction on the number of dwellings from 176 to 172.

In light of this amendment, NHSPS has updated the Healthcare Impact Assessment (HIA) of the proposed development. This update should be read alongside the NHSPS consultation response dated 21<sup>st</sup> December 2012, which is *attached* for ease of reference.

### Healthcare Impact Assessment

#### The Capital Funding Implications of the Proposed Development

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

Premises	List Size (Oct 2013)	No. GPs WTE	Capacity <sup>1</sup>	Spare Capacity <sup>2</sup>	Additional Population Growth (172 dwellings) <sup>3</sup>	Additional GPs Required to Meet Growth <sup>4</sup>	Additional Floorspace Required to Meet Growth <sup>5</sup>	Capital Required to Create Additional Floorspace <sup>6</sup>
Chesterfield Drive Surgery, Ipswich, IP1 6DW	14,322	5.6	10,080	-4,242	195	0.11	14.3	£28,600
Deben Rd Surgery, Ipswich, IP1 5EN	7,780	4.3	7,740	-40	195	0.11	14.3	£28,600
<b>Total</b>	<b>22,102</b>	<b>9.9</b>	<b>17,820</b>	<b>-4,282</b>	<b>390</b>	<b>0.22</b>	<b>28.6</b>	<b>£57,200</b>

**Notes:**

1. Based on optimum list size of 1,800 patients per GP.
2. Based on list size as at 1<sup>st</sup> October 2013.
3. Taken from applicant's Environmental Statement Addendum (Sept 2013).
4. Additional growth divided by optimum list size.
5. Based on 130m<sup>2</sup> floorspace per GP x additional GPs required to meet growth.
6. Based on standard m<sup>2</sup> 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/ m<sup>2</sup>), rounded to nearest £.

### Conclusion

As shown in Table 1 above, the amendments to the proposed development would not result in a revised healthcare mitigation requirement.

Therefore NHSPS maintains its holding objection to the proposed development.

It is noted that the applicant had previously submitted a viability appraisal of the proposed development, which concluded that payment of planning obligations and provision of affordable housing would render the scheme unviable.

NHSPS looks forward to working with the applicant and District Council to satisfactorily address the issues raised in this response and would appreciate acknowledgement of its safe receipt.

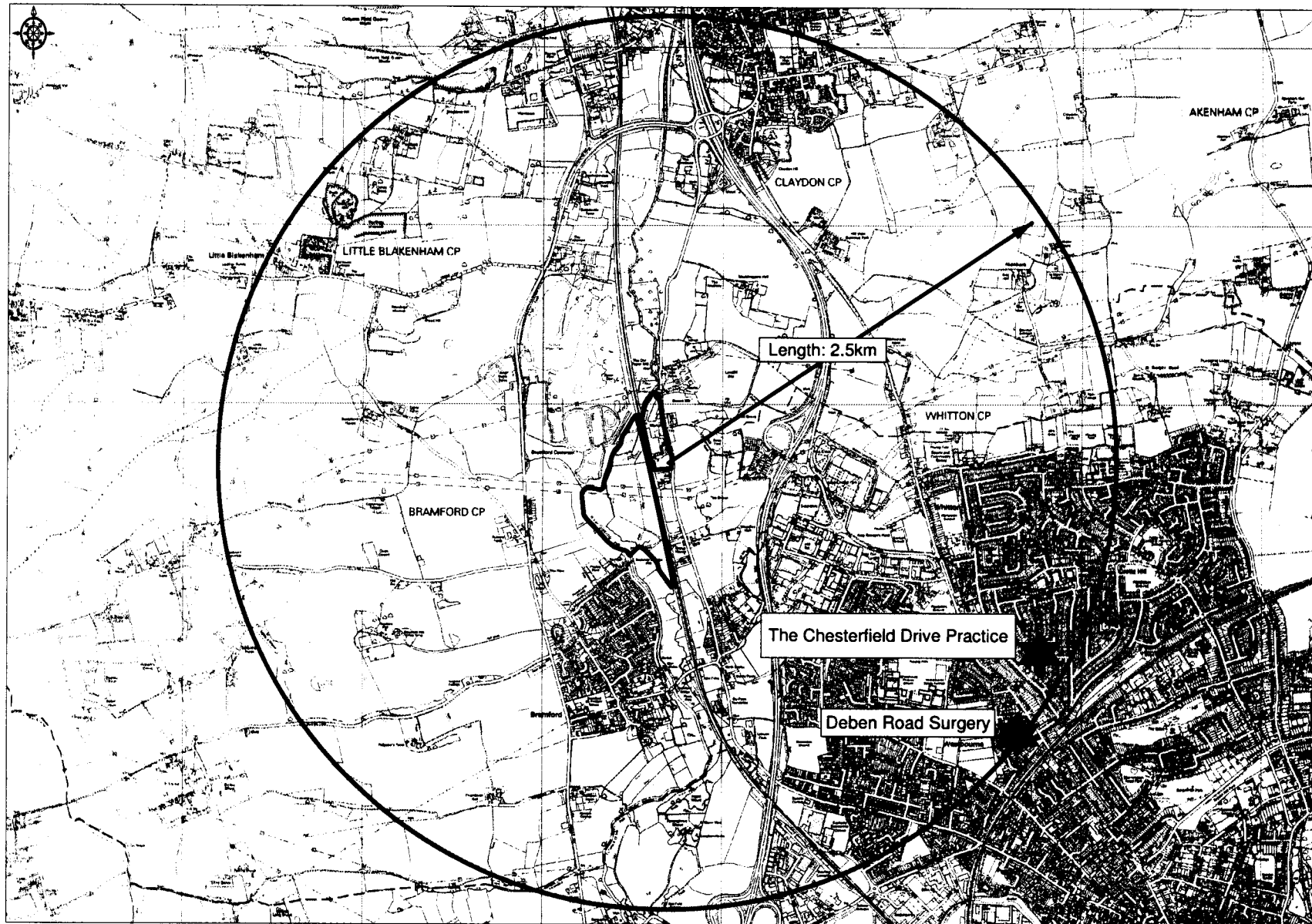
Yours sincerely

**Mrs Aarti O'Leary BA (Hons), MA (Merit), MRTPI**  
Consultant to NHS Property Services Ltd

Lawson Planning Partnership Ltd  
882 The Crescent  
Colchester Business Park  
Colchester  
CO4 9YQ

[aarti.oleary@lppartnership.co.uk](mailto:aarti.oleary@lppartnership.co.uk)  
Tel. 01206 835150

Proposed Mixed-Use Redevelopment of Former Scotts/ Fisons Site (Application Ref: 2700/12)  
Consultation Response on behalf of NHS Suffolk  
GP Catchment Area Plan (December 2012)



## NOT PROTECTIVELY MARKED

Your Ref: 2700/12  
Our Ref: Paper Mill Lane  
Date: 21 December 2012  
Enquiries to: James Cutting  
Tel: 01473 264803  
Email: [james.cutting@suffolk.gov.uk](mailto:james.cutting@suffolk.gov.uk)



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

Dear Mr Goodyear,

**Hybrid planning application for partial demolition of the listed warehouse (grade II) and refurbishment of the remaining for mixed commercial and residential uses. Erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, and (OUTLINE) for a further area to provide 103 dwellings. Modifications to Paper Mill Lane including provision of new accesses, as well as associated external areas including: car parking, onsite access roads and footpaths, formal and natural landscaped areas.**

Thank you for consulting with Suffolk County Council about this application. The county council acknowledges the level of consideration afforded to the site, its surroundings and the local community that has already been included in the application. This response has been prepared in pursuit of this council's service responsibilities and policy objectives.

The proposal is heritage-led. Were it not for the desire to preserve Suffolk's industrial heritage, this authority would not support this development. Even with the building's listed status, the provision of routes to facilitate sustainable travel choices from the site to Bramford and onward to Ipswich is a critical component, as is the necessary contribution to education. If these matters are not resolved, the county council will not consider the proposal to be sustainable and, therefore, will object to the application.

The application documents currently set out conflicting messages about the extent of mitigation that will be available. The draft Heads of Terms includes contributions to education and waste for example, but the Study of Section 106 Agreements and Affordable Housing Provision states (at 6.3) that there would be no contributions from the scheme. The county council cannot accept the latter position and, whilst willing to review its own requirements, such a position will not, ultimately, deliver a sustainable community.

The updated schedule of developer contributions is appended to this letter as are comments on fire safety which the developer might wish to consider. The county council also promotes the achievement of the Lifetime Homes Standard in addressing future care needs and the ageing population. The remainder of this letter will cover matters that the county council would suggest are relevant considerations in the determination of this application.

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**NOT PROTECTIVELY MARKED****Transport***Highways*

The impact of the development on the existing highways network and the alterations to Paper Mill Lane need careful consideration. Detailed comments will be provided under a separate cover from the council's highway engineers.

*Public Transport*

The Transport Assessment (TA) recognises that the nearest bus stop is about 1.4 km from the application site and that this is beyond what could be considered to be reasonable walking distance. Suffolk County Council would prefer new development to be situated to maximise the use of public transport. This is also the Government's policy as stated in the National Planning Policy Framework (NPPF, para. 34). The TA also recognises the NPPF and quotes the acknowledgement that "solutions will vary from urban to rural areas" (NPPF, para. 29), citing this as support for considering the distance between the site and the bus stop to be reasonable (TA, para. 7.2.2).

The county council considers that, even with this development, there is limited potential for bus services to serve the site and that demand responsive services will not be able to fill the gap in provision that exists along Paper Mill Lane. This means that the use of public transport can only be maximised through improvements to encourage pedestrian and cyclist movements to connect with services from Gables Corner. This authority considers this distance to be beyond what would be reasonable for pedestrians and seeks the provision of secure and covered cycle parking at Gables Corner.

*Walking and Cycling*

The proposal comprises several elements to mitigate the likely demand by residents travelling and enjoying recreation, as well as to promote sustainable travel. Given the acknowledged limitations of public transport, the need to ensure a safe route to promote and maximise sustainable modes of travel is particularly relevant.

A critical feature will be a safe and accessible route for pedestrian and cyclists along Paper Mill Lane. The county council has previously expressed its reservations over the shared use of passing spaces for pedestrians, cyclists and motorists waiting for space to pass. These still apply and will be further explained in the detailed response to highway matters.

The alternative route from the site to Bramford along the proposed combined footpath and cycleway between the two existing underpasses is supported and a welcome addition. The county council would prefer this route to be designated as a bridleway to secure it over the long-term and will be seeking maintenance contributions for this purpose or, without such a designation, another form of long-term commitment. In order to provide adequate access, the connections to this route will also need to be improved beyond that identified on drawing 18449/4.1E.

Improvements will, therefore, be necessary to footpaths FP24 and FP27 (to Bushmans Bridge) and FP50 (under the railway) to secure an adequate link between the site along the new combined footpath and cycleway to Bramford and Paper Mill Lane respectively. FP22, FP24 and FP27 would all require upgrading to bridleway status, with signs required on Bushman's Bridge to advise cyclists to dismount otherwise a more substantial (and costly) bridge would be necessary. The route along FP50 under the railway bridge would need surfacing and safety barriers.

**NOT PROTECTIVELY MARKED**

Whilst not necessary to directly connect the site with Bramford, recreational walkers are likely to use FP50 and improvements to the surface and safety are necessary. Given close proximity between the river edge dwellings and the footpath, these improvements could be of benefit to the appearance of the development overall. An incidental matter to note is that the route of the improved Footpath 22 (as indicated on drawing 18449/4.1E) does not appear to follow the route of the path on the ground.

**Surface Water Drainage**

This authority's flood and water team is concerned that no combined assessment has been made of flows when the Gipping is in flood, when the outfall from the site is restricted. This could have significant consequences for the effectiveness of the drainage and, in particular, the required size of water storage. In order for this authority to be satisfied with the proposed management of surface water, further clarification will be required for the following:

- whether inflation mechanisms are possible, given the acknowledged contamination;
- the organisations responsible for future maintenance (e.g. landowners, water company, highway authority), particularly for the outflow under the railway;
- exceedance routes need to be shown on a plan (for example, buildings A & B form a barrier to the natural flow);
- calculations for each catchment to accord with that stated in the report, and
- how inflow from the upland areas beyond the site is to be managed.

**Landscape**

A separate response from our landscape team – who are providing more formal advice as part of a partnership agreement – has been sent to Mid Suffolk District Council. Given the role of the Gipping Valley Path for recreation, careful landscape treatment of boundaries and the wider valley open space meadows are essential aspects of the scheme as a whole.

**Sustainability Standards and Energy**

The aims to achieve a "very good" BREEAM rating for the non-residential element and level four of the Code for Sustainable Homes are welcome, particularly as the latter standard incorporates greater requirements for water conservation than current building regulations. The proposed energy centre and the potential to link this at a later stage to the energy from waste plant to the north are also supported. The Greenest County Team would be available to assist Mid Suffolk and the developer to implement the proposals and to consider how the cost of the initial infrastructure can be set against potential income. This income could then be reflected in the assessment of viability.

**Noise**

Detailed comments have been prepared and will be part of this authority's detailed response on highways. One matter has arisen, however, that relates to the impact of the proposed changes to Paper Mill Lane. The Environmental Assessment (Chapter 11.0) does not reflect the changes in speed following the introduction of traffic calming measures and passing places. Whilst the passing bay option is probably the least intrusive of traffic calming measures, the potential for additional disturbance needs to be properly quantified so that adjacent residents are aware of the potential.

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**NOT PROTECTIVELY MARKED**

I hope that these comments are useful. Please contact me via the contact details at the beginning of this letter, should you have any questions or require any clarification.

Yours sincerely,



James Cutting  
Principal Spatial Planning Specialist  
Economy, Skills and Environment Directorate





## Economy, Skills & Environment

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

Rights of Way and Access Team  
Block 1, Floor 5  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Tel: 01473 260811  
Fax: 01473 216864  
Email: [PROWPlanning@suffolk.gov.uk](mailto:PROWPlanning@suffolk.gov.uk)  
Website: <http://publicrightsofway.onesuffolk.net/>

**For The Attention of: Peter Goodyear**

Your Ref:  
Our Ref: 325/W155/022/ROW608/12  
Date: 14 December 2012

Dear Sir/Madam

**Planning Application No:** 2700/12  
**Location:** Land at the former Scotts/Fisons site, Paper Mill Lane, Bramford  
**Proposal:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.

### Public Rights of Way Response

Thank you for your consultation dated 29<sup>th</sup> November 2012 concerning the above application.

Bramford Public Footpaths No. 22, 23 24 and 25 pass through the site; Bramford Public Footpaths No. 26, 27 and 50 are adjacent to the site. Please find enclosed a digital plot showing the definitive alignment of these routes, as near as can be ascertained. This plot is for information only and is not to be scaled from.

It is not clear from the Figure 4.1 Parameter Plan Rev E whether the proposed footpath/cycleway between the railway underpass and Bushman's bridge is to be a separate new route or intended to be an upgrade of Bramford Public Footpath No. 22. Should it be the latter then the route is not shown on the correct legal alignment.

As a result of anticipated increased use of the public rights of way network in the vicinity of the development, we would be seeking a contribution for improvements to the network. These requirements will be submitted with the Development Management response in due course.

Cont/...


The following points should be taken into account:

1. There must be no interference with the surface of the right of way as a result of the development.
2. The right of way must be kept clear and unobstructed for users and no structures placed upon the right of way.
3. Any damage to the surface of the route(s) as a result of the development must be made good by the applicant.
4. The Highways Authority is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage that it has to remedy.

There are four different statuses of public rights of way:

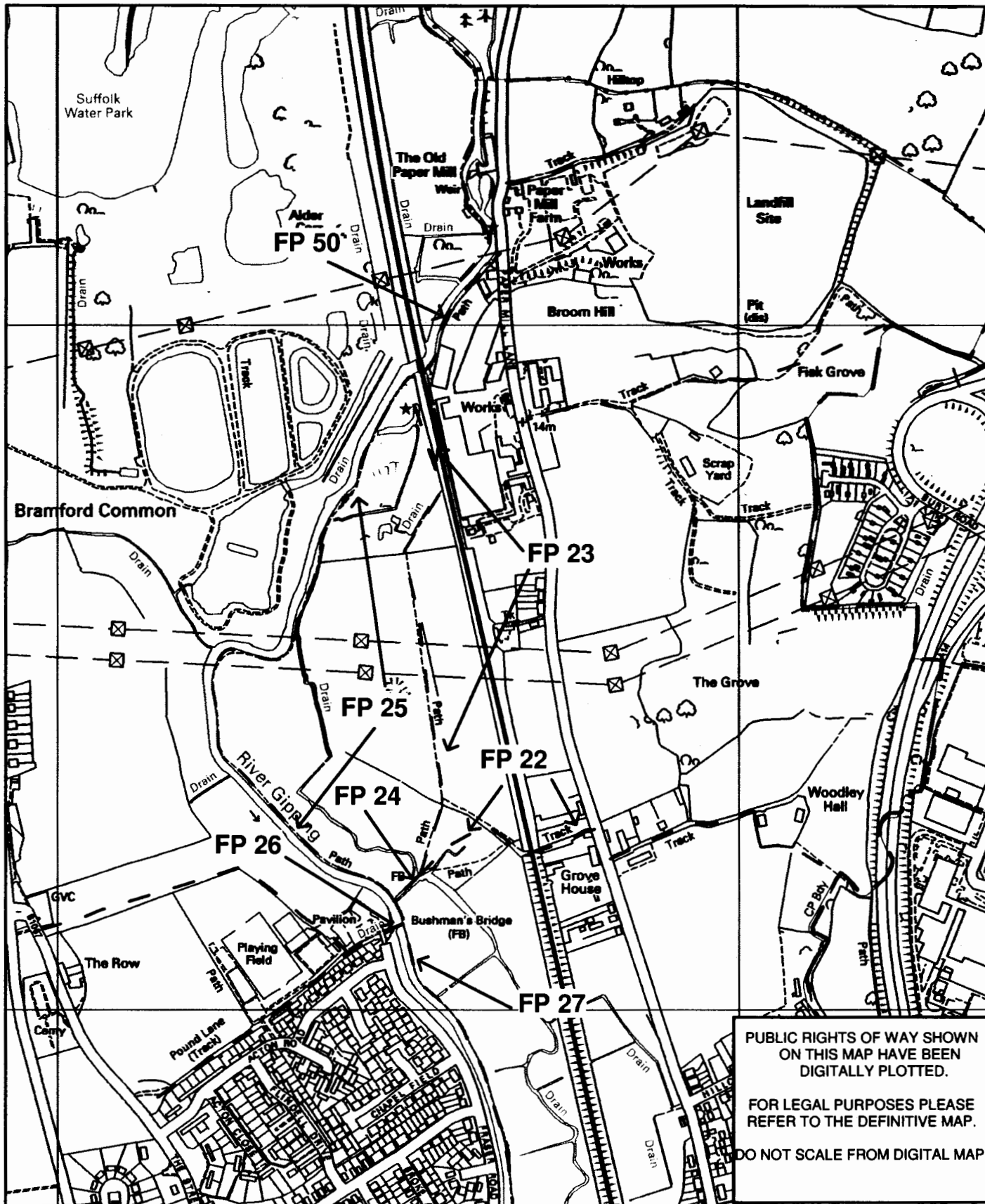
- **Public footpath** – this should only be used by people **on foot**, or using a mobility vehicle.
  - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
  - **Restricted byway** – this has similar status to a bridleway, but can also be used by a 'non-motorised vehicle', for example a **horse and carriage**.
  - **Byway open to all traffic (BOAT)** – these can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle.
5. The Area Rights of Way Office must approve any proposed works to the surface of the route(s). For guidance on how to obtain permission go to [Works Application Form and Guidance](#) or email [pro.west@suffolk.gov.uk](mailto:pro.west@suffolk.gov.uk).
  6. The applicant should have private rights to take motorised vehicles over the public right of way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a public right of way other than a byway. We do not keep records of private rights.
  7. If the public right of way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from the County Council. A fee is payable for this service. For further information and advice go to [TRO Application Form and Guidance](#) or email [pro.west@suffolk.gov.uk](mailto:pro.west@suffolk.gov.uk).
  8. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.
  9. Public rights of way are protected by law. If you wish to build upon, block, divert or extinguish a right of way within the development area marked on the planning application an order must be made, confirmed and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990.

Yours faithfully



**Jackie Gillis**  
Rights of Way Support Officer

CC: Barton Willmore LLP - [james.garrett@bartonwillmore.co.uk](mailto:james.garrett@bartonwillmore.co.uk)

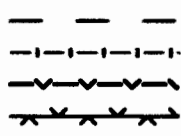


**2700/12 Land at the former Scotts/Fisons site, Paper Mill Lane, Bramford  
Public Rights of Way**



**Suffolk  
County Council**

Lucy Robinson,  
Director of Economy, Skills and Environment,  
Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

Public Footpath  
Bridleway  
Restricted Byway  
Byway  
Definitive Map Parish Boundary

Scale 1:7500



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DATE: 5/12/2012

# Suffolk

**PRESERVATION SOCIETY**

*Respecting the past. Shaping the future*

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16 December 2013

Mr Philip Isbell  
 Corporate Manager Development Management  
 Mid Suffolk District Council  
 131 High Street  
 Needham Market  
 Suffolk  
 IP6 8DL

For the attention of: Mr Ian Ward

Dear Mr Ward

**Re: Land at former Scotts/Fisons Site, Paper Mill Lane, Bramford Ref2700/12(FUL) and 2701/12(LBC)**

**Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the application site (re-advertised - amended plans/information received)**

Thank you for your letter dated 11 November inviting the Society to comment on the amended scheme. Further to our letter dated 7 January 2013, The Society has considered the additional and revised submission and would like to make the following observations. We welcome the submission of the viability assessment. This has demonstrated the significant conservation deficit, in the region of £5 million and notes that the districts conservation officer, together with the SCC heritage officer and English Heritage officer have been convinced by the public benefit of the proposals.

Having acknowledged their respective positions, the Society would simply like to reiterate the need for very careful phasing of the demolition works in any consent. A S.106 should include a clear phasing of the demolition of the five listed buildings, with viability reviews built into the phasing. In this way any uplift in market conditions can be identified and the continued justification for the extent of the demolition can be reviewed. The buildings identified as being of lesser significance (G & J) followed by those of Moderate Interest (C & H) should be sequentially identified for demolition first. Those of Major Interest (D and E) should be included in the last phase, depending upon the potential increased viability of the scheme as the economic conditions improve. Furthermore, the Society considers that it is

necessary to ensure that the letting/selling of the dwellings must be related to the first securing the repair and refurbishment of the listed parts of the scheme.

The Society would also take the opportunity to reiterate its concern regarding the detailed works of alteration to Blocks A and B. The conversion of North Warehouse (Block A and B) involves significant alteration to the external appearance of the listed buildings including the loss of original fenestration and replacement with numerous new openings (on the north and south elevations) employing double glazed fenestration. Blocks A, B and C contain historic double and triple height spaces which appear to be lost by the intensive nature of the residential conversion. Furthermore, the full height extensions to the north elevation of Block B are a major alteration that has not been justified by the supporting documents. Such major interventions are clearly highly damaging and regrettable, serving to further erode the residual industrial character of this important group of buildings. Therefore, the detailed form of the conversions should seek to retain greater expression of their defining elements of the historic buildings.

It is also noted that there is no reference to the phasing of development as part of any consent. The condition of the North Warehouse is a matter of great concern. As a matter of urgency, the listed structures need to be protected from further deterioration. In particular, the holes in the roof need urgent attention to limit further water ingress. A schedule of holding works should be agreed as part of a S.106 agreement. The submission refers to the phasing of the demolition but makes no provision for the repair works prior to the commencement of the new building elements. This is a serious omission which must be addressed. A carefully framed legal agreement is essential to ensure that the scheme delivers the future of the listed buildings which are at risk and in urgent need of repair. A schedule of urgent works should be drawn up and form the basis of any S.106 to ensure that the needs of the heritage assets are prioritised.

I trust that you will find these comments helpful.

Yours sincerely



Fiona Cairns  
IHBC MRTPI  
Director

*Bramford Parish council, Chairman SPS, Mid Suffolk SPS Committee*

Thank you for your consultation on the above dated 29 November 2012 which was received by Natural England on the same day.

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.

**SSSI - No objection**

This application site is located about 2km from Little Blakenham Pit SSSI. However, given the nature and scale of this proposal, Natural England is satisfied that there is not likely to be an adverse effect on this site as a result of the proposal being carried out in strict accordance with the details of the application as submitted. We therefore advise your authority that this SSSI does not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(1) of the *Wildlife and Countryside Act 1981* (as amended), requiring your authority to re-consult Natural England.

**Protected species**

Natural England does not object to the proposed development. On the basis of the information available to us, our advice is that the proposed development is likely to affect roosting bat species through disturbance and damage or destruction of a roosting site. We are satisfied however that the proposed mitigation would maintain the population identified in the survey report.

We advise that conditions should be attached to the planning permission to secure that the mitigation measures identified in the ecological statement are implemented. We also advise that your authority requests a detailed mitigation scheme that demonstrates adequate placing of bat boxes in suitable places, in relation to the details of a bat friendly lighting scheme.

All bat species are European Protected Species. A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided through avoidance (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development.

Natural England's view on this application relates to this application only and does not represent confirmation that a species licence (should one be sought) will be issued. It is for the developer to decide, in conjunction with their ecological consultant, whether a species licence is needed. It is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice we have provided on likely impacts on favourable conservation status and Natural England's guidance on how we apply the 3 tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) when considering licence applications.

In relation to other protected species (birds, reptiles), we advise that the mitigation measures identified are secured by appropriate planning conditions.

Natural England has produced standing advice, which is available on our website Natural England Standing Advice to help local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, local planning authorities should undertake further consultation with Natural England.

#### **Local wildlife sites**

If the proposal site is on or adjacent to a local wildlife site, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application. In this case, the development site is close to River Gipping County Wildlife site and Bramford Meadows CWS and LNR. We advise that your authority consults Suffolk Wildlife Trust, also in relation to the proposed provision and management of reptile receptor habitat.

#### **Biodiversity enhancements**

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

#### **Landscape enhancements**

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Thank you for your consultation.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 03 January 2013.

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application relate largely to layout, and are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

Camilla Davidge  
Natural England





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

**AW Reference:** 1404/SP18(004)  
**Local Planning Authority:** Mid Suffolk District Council  
**Site:** Paper Mill Lane, BRAMFORD  
**Proposal:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses.  
**Planning Application:** 2700/12

**Prepared by Keith Simpson**

**Date 19 December 2012**

If you would like to discuss any of the points in this document please contact me on 01733 414607 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

*"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."*

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

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

### **Section 3 – Foul Sewerage Network**

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

### **Section 4 – Surface Water Disposal**

- 4.1 The preferred method of surface water disposal would be to a sustainable drainage system (SUDS) with connection to sewer seen as the last option.

Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

- 4.2 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 is the appropriate body to comment.

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

## **Section 5 – Trade Effluent**

- 5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.

*"An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.*

*Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.*

*Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."*

**Notification of Consultation on Planning Application**

**FROM:** Professional Lead - Planning  
**TO:** Economic Strategy Officer  
**OUR REF:** 2700 / 12 / FUL  
**DATE:** 29/11/2012

**CASE OFFICER:** Peter Goodyear

**PROPOSAL:** Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.

**LOCATION:** Land at the former Scotts/Fisons site, Paper Mill Lane, Bramford

Site Area 26.42 Hectares

Please let me have your observations on the above proposal within 21 days.

Peter Goodyear

This has been a largely vacant or under-utilized employment site for many years. I recognise that there is an urgent need to protect some of the listed buildings and bring them back into use. This requires an amount of residential development to cross-fund the investment in the buildings. I also note that the size, scale and configuration of the listed warehouses limit the type of modern employment uses. The previous B2/B8 use of this factory is no longer suitable and the proposed mix of retail, B1 workshops and office accommodation offers a better and more sustainable option for the buildings whilst providing up to 262 new jobs on the site.

This site is located within the Ipswich Policy Area which is identified in the recently published Suffolk Growth Strategy as a Principal Economic Growth Location. The proposed development could accommodate businesses operating in Suffolk's key growth sectors such as ICT, tourism, finance & insurance, creative and cultural industries and so help to support the growth aspirations for Greater Ipswich.

I am therefore happy to support the application.

Dawn Easter

Economic Development Officer

Mid Suffolk District Council

M.S.D.C.

MID SUFFOLK DISTRICT COUNCIL  
PLANNING CONTROL  
RECEIVED  
12 JAN 2013  
ACKNOWLEDGED  
DATE  
PASS TO

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

10 JAN 2013

TO: Chief Planning Control Officer For the attention of: Peter Goodyear

FROM: Nathan Pittam, Environmental Protection Team DATE: 9<sup>th</sup> January 2013

YOUR REF: 2700/12/FUL. Land at the former Scotts/Fisons site.

SUBJECT: Demolition of all other buildings for more info ...  
Address: Land at the former Scotts/Fisons site. Partial demolition of the Grade II Listed North Warehouse & refurbishment of remaining Warehouse for mixed commercial & residential uses.

**Please find below my comments regarding contaminated land matters only.**

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

*No development shall take place until:*

1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.
2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.
3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.
4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.
5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.

*Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.*

**It is important that the following advisory comments are included in any notes accompanying the Decision Notice:**

*"There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.*

*Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.*

*The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:*

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

*Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.*

*The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's*



**From:** Pittam, Nathan  
**Sent:** 18 November 2013 15:04  
**To:** Ian Ward  
**Subject:** 2700/12/FUL.

Dear Ian,

**2700/12/FUL.**

**Land at the former Scotts/Fisons site.**

**Partial demolition of the Grade II Listed North Warehouse & refurbishment of remaining Warehouse for mixed commercial & residential uses. Demolition of other buildings etc. Revised information received.**

Many thanks for your request for additional comments on the above application in relation to the newly submitted information. I can confirm that the new document does have any additional information relating to land contamination and as such I have no additional comments to make over those made during 2012.

Regards

Nathan

Dr. Nathan Pittam  
Senior Environmental Management Officer - Environmental Protection

creating a better place



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

**Our ref:** AE/2012/115462/03-L01  
**Your ref:** 2700/12

**Date:** 12 November 2013

Dear Sir/Madam

**PARTIAL DEMOLITION OF THE GRADE II LISTED NORTH WAREHOUSE AND REFURBISHMENT OF THE REMAINING WAREHOUSE FOR MIXED COMMERCIAL AND RESIDENTIAL USES. DEMOLITION OF ALL OTHER BUILDINGS ON THE APPLICATION SITE AND ERECTION OF A TOTAL OF 176 RESIDENTIAL DWELLINGS OF TWO TO FIVE STOREYS COMPRISING (FULL) DETAILS OF 73 DWELLINGS, THE LOCATIONS OF WHICH ARE SHOWN ON DRAWING NUMBER 18449/501 AND (OUTLINE) FOR A FURTHER AREA TO PROVIDE 103 DWELLINGS, THE LOCATION OF WHICH IS SHOWN ON DRAWING NUMBER 18449/501. MODIFICATIONS TO PAPER MILL LANE INCLUDING PROVISIONS OF NEW ACCESS TO THE APPLICATION SITE AND ASSOCIATED EXTERNAL AREAS INCLUDING CAR PARKING, ONSITE ACCESS ROADS AND FOOTPATHS, FORMAL LANDSCAPED AREAS AND NATURAL LANDSCAPED AREAS. (RE-ADVERTISED - AMENDED PLANS/INFORMATION RECEIVED): LAND AT THE FORMER SCOTTS/FISONS SITE, PAPER MILL LANE, BRAMFORD**

Thank you for consulting us about the proposed modifications to the above development proposal. We have considered the further information and offer the following advisory comments.

### **Flood Risk**

We note that paragraph 10.1 of the Environmental Statement Addendum Non-Technical Summary advises that 'The assessment of water resources and flood risk was reviewed in light of the response from Environment Agency. Further information is provided within the ES Addendum regarding drainage of the land to the east of the railway and west of Paper Mill Lane along with an updated assessment of the effects of the revised drainage scheme. The design modifications have not affected the overall outcomes of the assessment'. The main body of the Environmental Statement Addendum and Revised Drawings document goes on to state at paragraph 12.1 that 'The principles of the drainage strategy have not altered although more information has been provided in

Environment Agency  
Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD.  
Customer services line: 03708 506 506  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

Cont/d..



terms of the details of the drainage strategy'. Paragraph 12.2 indicates that an addendum to the Flood Risk Assessment is attached at Appendix A12.1.

We responded to this Flood Risk Assessment Addendum document by way of letter dated 29 April 2013 and recommended that the measures detailed in the submitted FRA (Rev 2, dated 14/08/2012) and Flood Risk Assessment Addendum (Rev 1, dated 04/03/2013) are implemented and secured by way of a planning condition on any planning permission.

#### **Condition**

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) (Ramboll UK Ltd (2012) Old Fisons Site: Flood Risk Assessment (Rev 2, dated 14/08/2012)) and the FRA Addendum (Ramboll UK Ltd (2013) Old Fisons Site: Flood Risk Assessment Addendum (Rev 1, dated 04/03/2013)) and the following mitigation measures detailed within these documents:

1. Limiting the surface water run-off generated by the critical duration 1 in 100 year return period rainfall event, including allowances for climate change to the existing mean annual discharge rates (for each catchment and sub-catchment) contained within the FRA Addendum.
2. Provision of flood storage including grassed attenuation basins, swales and permeable paving storage areas, sized and designed as per the calculations and cross sections provided within the FRA Addendum to manage the volume of water generated in all rainfall events up to and including the 1 in 100 year return period event including allowances for climate change.
3. The pipe diameters of the drainage network shall be determined during the detailed design stage and shall be sized to adequately convey the critical duration 1 in 100 year return period rainfall event, including allowances for climate change.
4. In the event of exceedance flows that surpass the critical duration rainfall event or a blockage/failure occurs within the drainage network/hydrobrake the grassed attenuation basins shall incorporate an emergency spillway as part of their design.
5. The maintenance requirements for the sustainable drainage (SUDS) element of the proposed surface water drainage system shall be carried out as per Table 5.1 of the FRA Addendum submitted and in accordance with the requirements of those maintaining the system. In addition, the organisation responsible for the maintenance of the southern catchment culvert must be determined at the detailed design stage and a suitable monitoring and maintenance plan devised to ensure that the culvert remains fully functional for the design life of the development.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing and phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

#### **Reason**

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site in a range of rainfall events and ensure the system operates as designed for the lifetime of the development.

Our position remains, in essence, the same as that set out in our earlier letter dated 29 April 2013. The advisory comments presented in our earlier letters dated 19 December 2012 and 29 April 2013 continue to apply.

Cont/d..

[REDACTED]

[REDACTED]

[REDACTED]

Planning Advisor

Direct dial 01473 706749

Direct fax 01473 271320

Direct e-mail [andrew.hunter@environment-agency.gov.uk](mailto:andrew.hunter@environment-agency.gov.uk)

cc Barton Willmore Partnership

End

3

## **Consultee Comments for application 2700/12**

### **Application Summary**

Application Number: 2700/12

Address: Land at the former Scotts/Fisons site, Paper Mill Lane, Bramford

Proposal: Partial demolition of the Grade II Listed North Warehouse and refurbishment of the remaining Warehouse for mixed commercial and residential uses. Demolition of all other buildings on the Application Site and erection of a total of 176 residential dwellings of two to five storeys comprising (FULL) details of 73 dwellings, the locations of which are shown on drawing number 18449/501 and (OUTLINE) for a further area to provide 103 dwellings, the location of which is shown on drawing number 18449/501. Modifications to Paper Mill Lane including provisions of new access to the Application Site and associated external areas including car parking, onsite access roads and footpaths, formal landscaped areas and natural landscaped areas.

Case Officer: Peter Goodyear

### **Consultee Details**

Name: Mrs Trish Hayward

Address: Optua Unit 12 Hill View Business Park Old Ipswich Road, Claydon, Ipswich IP6 0AJ

Email: trish.hayward@optua.org.uk

On Behalf Of: Optua

### **Comments**

The application proposals appear to make some provision for people with disabilities, although we cannot find specific commitments to meeting acceptable standards. The new-build elements of the scheme will be required to comply fully with the Part M of the Building Regulations and consequently should include acceptable provision. However, the Building Regulations requirements for conversion of the existing buildings can be less demanding, and the applicant's commitment to making adequate provision for people with disabilities needs to be confirmed as part of the planning application process. For example, the lifts proposed for access to the upper floors of the Business Centre and part of the flats conversion should comply with the new-build standard of Approved Document M, new staircases should be to the same standard, as should internal and external door widths. We find it unacceptable to propose the conversion of one part of the existing building into fifteen flats on three floors above ground level without providing lift access.