# Consultee Comments for Planning Application DC/19/03924

**Application Summary**
Application Number: DC/19/03924
Address: Land To The West Of The Former Bacon Factory Elmswell
Proposal: Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)
Case Officer: Bradly Heffer

**Consultee Details**
Name: Mr Peter Dow
Address: Blackbourne Community Centre, Blackbourne Road, Elmswell Bury St Edmunds, Suffolk IP30 9UH
Email: clerk@elmswell.suffolk.gov.uk
On Behalf Of: Elmswell Parish Clerk

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

1 The site is outside of the Settlement Boundary and is not a Preferred Option in the emerging BMSDC Joint Local Plan. It represents ad hoc development without the safeguards of any strategic planning and, as such, is an unsustainable location on which development should not be approved.

2 The proposal found no support during the pre-application consultation process from either Elmswell Parish Council or the public. It imposes further strain on the infrastructure provision which is already stretched to accommodate 634 houses in Elmswell with Planning permission currently being built-out or soon to commence construction. Of specific concern are:
2.1 Highways infrastructure which, at the School Road / Church Road junction, is already over the safe operating capacity, as confirmed by SCC Highways, and where no mitigation is suggested or offered.
2.2 Highways infrastructure where the clear guidance enshrined in the Suffolk Design Guide is for 150 dwellings served by a single access road, this stricture already breached by the host development here on the Bacon Factory site and now further to be ignored in a proposal which seeks to allow 265 dwellings to be accessed from the increasingly busy single junction at Ashfield Road, a 56% uplift on the accepted safe limit.
2.3 Educational provision which is already stretched by extant proposals requiring the expansion of Elmswell Primary School on its constricted site to accommodate 420 pupils and which, by Suffolk County Council admission, still leaves a residue of Elmswell children required to be bussed

elsewhere when all current housing development is realised. All of the primary schoolchildren from the new housing proposed here would have to travel by bus to receive their primary education.

3 The addition of the public green space to the north of the site, which was not originally mooted at the consultation stage, inevitably means that the land reserved for the Relief Road separates the residents from their recreation area posing a hazardous prospect as any such road would, by definition, carry considerable volumes and weight of traffic.

Peter Dow
Clerk to Elmswell parish Council
17.09.2019

**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
**Sent:** 29 August 2019 10:19
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
**Subject:** Consultation Response 292884 - DC/19/03924

Application ref: DC/19/03924
Our ref: 292884

Natural England has no comments to make on this proposal.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice

Yours faithfully

David Allinton
Natural England
Consultations Team
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: 0300 060 3900
Email: consultations@naturalengland.org.uk

**www.gov.uk/natural-england**

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

## Developments Affecting Trunk Roads and Special Roads

## Highways England Planning Response (HEPR 16-01)
## Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
Operations (East)
planningee@highwaysengland.co.uk

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: DC/19/03924

Referring to the planning application referenced above, dated 21 August 2019, application for site remediation works and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping, land to the west of former Bacon Factory, Elmswell, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~

~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~

~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B ~~is /~~ is not relevant to this application.[1]

[1] Where relevant, further information will be provided within Annex A.

| | |
|---|---|
| **Signature:** [redacted] | **Date:** 04 September 2019 |
| **Name:** David Abbott | **Position:** Spatial Planner |
| **Highways England:**<br>Woodlands, Manton Lane<br>Bedford MK41 7LW<br><br>david.abbott@highwaysengland.co.uk | |

## Annex A

The proposed development is unlikely to result in a severe impact upon the A14, we therefore offer no objection in this case.

Environment Agency

Bradley Heffer
Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
Suffolk
IP1 2BX

**Our ref:** AE/2019/124413/01-L01
**Your ref:** DC/19/03924

**Date:** 09 September 2019

Dear Mr Heffer

**OUTLINE PLANNING APPLICATION (SOME MATTERS RESERVED - ACCESS TO BE CONSIDERED) FOR SITE REMEDIATION WORKS (PHASE 1) AND THE ERECTION OF UP TO 65 DWELLINGS WITH THE SAFEGUARDING OF LAND FOR POTENTIAL FUTURE DELIVERY OF A RELIEF ROAD, PUBLIC OPEN SPACE AND ASSOCIATED LANDSCAPING (PHASE 2)**
**LAND TO THE WEST OF THE FORMER BACON FACTORY ELMSWELL**

Thank you for your consultation dated 21 August 2019. We have reviewed the application as submitted and have no objection to the scheme as planned provided the following conditions are appended to any grant of permission. Without these conditions we would object to the application.

We have attached an appendix containing advice and informatives for the developer.

## Groundwater and Contaminated Land

We have reviewed the *Former Grampian Foods, Elmswell, Suffolk, Phase I and II Geo-Environmental Assessment, DQRA and Remediation Strategy report (RPT-0018), February 2015,* and, based on the information provided, have the following comments:

- We agree on the results of the detailed quantitative risk assessment for controlled waters, which determined that the risk to the principal aquifer posed by the hot spot located at BH11 (former diesel tank location) is low.
- We note the existence of an historic onsite abstraction borehole.

- We note that piling is the proposed foundation solution for a part of the site. Deep foundations have the potential to impact on groundwater resources.
- We agree that infiltration drainage systems are not suitable for this site, due to the very low hydraulic conductivity of the superficial deposits. Details of an alternative proposed drainage system for the proposed development should be submitted to the local authority for discussion and written approval.

This outline planning application (Phase 1 and 2) demonstrates that it will be possible to manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

We consider that planning permission could be granted to the proposed development as submitted, if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

**Condition 1**

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

**Condition 2**

No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

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

**Condition 3**

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to

demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

**Reasons for Conditions 1-3**

To protect and prevent the pollution of the water environment (particularly groundwater associated with the underlying Secondary and Principal Aquifers, from potential pollutants associated with current and previous land uses) in line with National Planning Policy Framework (NPPF; paragraphs 170 and 178), EU Water Framework Directive, Anglian River Basin Management Plan and Environment Agency Groundwater Protection Position Statements (2017) A4 – A6, J1 – J7 and N7.
National Planning Policy Framework (NPPF) paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 178).

**Condition 4**

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

**Reason for Condition 4**

Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

**Condition 5**

**Borehole Management and Decommissioning**

A scheme for managing any borehole, either already existing (such as the historic abstraction borehole), or installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of the development.

**Reasons for Condition 5**

To ensure that redundant boreholes are safe and secure, and do not cause

Cont/d..

groundwater pollution or loss of water supplies in line with paragraph 109 of the National Planning Policy Framework and Position Statement A8 of our Groundwater Protection: Principles and Practice. We expect best practice regarding the development or backfilling of any shaft, well, borehole, tunnel or adit in order to prevent pollution or loss of water resources. We expect operators to adopt appropriate engineering standards and comply with our publication, Good practice for decommissioning redundant boreholes and wells (Environment Agency 2012). Any contamination that is discovered during decommissioning or otherwise should be dealt with in accordance with our position statements on land contamination.

We trust this advice is useful.

Yours sincerely

**Mr Mark Macdonald**
**Planning Advisor**

Direct dial 02030255475
Direct e-mail Mark.Macdonald@environment-agency.gov.uk

**Appendix**

We recommend that developers should:

1) Refer to our 'Groundwater Protection' website;
2) Refer to our CL:AIRE Water and Land Library (WALL) and the CLR11 risk management framework provided in https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks when dealing with land affected by contamination, and also includes the Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health;
3) Refer to our Land Contamination Technical Guidance;
4) Refer to 'Position Statement on the Definition of Waste: Development Industry Code of Practice';
5) Refer to British Standards BS 5930:1999 A2:2010 *Code of practice for site investigations* and BS10175:2011 A1: 2013 *Investigation of potentially contaminated sites – code of practice*
6) Refer to our 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination' National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of 'Piling Into Contaminated Sites'.
7) Refer to our 'Good Practice for Decommissioning Boreholes and Wells'.
8) Refer to our 'Dewatering building sites and other excavations: environmental permits' guidance when temporary dewatering is proposed.

End

integrated working

NHS
West Suffolk
Clinical Commissioning Group

West Suffolk House
Western Way
Bury St Edmunds
Suffolk IP33 3YU
Tel: 01284 758010
www.westsuffolkccg.nhs.uk

Our ref: WSCCG/000819/ELM
Email: planning.apps@suffolk.nhs.uk
Date: 05/09/2019

Your Ref: DC/19/03924

Planning and Regulatory Services,
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk, IP1 2BX

Dear Sir/Madam,

**Proposal:** Outline Planning Application (some matters reserved - access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)
**Location:** Land To The West Of The Former Bacon Factory, Elmswell

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating West Suffolk Clinical Commissioning Group (CCG).

**Background**

2. The proposal comprises a development of up to 65 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

**Review of Planning Application**

3. There is 1 GP practice within a 2km radius of the proposed development, This practice do not have sufficient capacity for the additional growth resulting from this

development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

**Healthcare Impact Assessment**

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

5. The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

**Table 1: Summary of capacity position for healthcare services closest to the proposed development.**

| Premises | Weighted List Size [1] | NIA ($m^2$)[2] | Capacity [3] | Spare Capacity (NIA $m^2$)[4] |
|---|---|---|---|---|
| Woolpit Health Centre | 14,696 | 705 | 10,281 | -303 |
| **Total** | **14,696** | **705** | **10,281** | **-303** |

1. The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
2. Current Net Internal Area occupied by the Practice.
3. Based on 120$m^2$ per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services"
4. Based on existing weighted list size.

6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Woolpit Health Centre servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.

7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

integrated working

**Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising**

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.

9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.

10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

Yours faithfully

**Chris Crisell**
Estates Planning and Project Support Manager
West Suffolk Clinical Commissioning Group

Your Ref:DC/19/03924
Our Ref: SCC/CON/3473/19
Date: 11 September 2019

Suffolk County Council

**All planning enquiries should be sent to the Local Planning Authority.**
Email: planning@baberghmidsuffolk.gov.uk

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

For the attention of: Bradly Heffer

Dear Bradly,

**TOWN AND COUNTRY PLANNING ACT 1990**
**APPLICATION REF:** DC/19/03924

**PROPOSAL:** Outline Planning Application (some matters reserved - access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)

**LOCATION:** Land to the West of the former Bacon Factory, West of Station Road, Elmswell IP30 9ED

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:

COMMENTS

Trip Generation and Capacity -
The trip rates in the Transport Assessment (TA) for the proposed scheme are suitable for this location. The TA indicates all the junctions will operate within capacity except School Road/Church Road junction where this site and committed developments show queuing and traffic congestion on the School Road arm of the junction during the peak periods. The maximum calculated RFC is 1.05 (1 being at capacity) and the queue lengths are 18 (calculated delay of approx 2.5 minutes). The main concern would be safe routes for the pedestrian/cyclist and driver frustration. There are alternative routes from the proposed development and it could be considered that many drivers will chose these routes to avoid queuing on School Road. Pedestrian and cyclists would benefit from improved facilities at this junction such as wider footways and dropped crossings.
The barrier at the level crossing on Station Road currently operates an average of three times per hour during the AM peak and five times per hour during the PM peak. It has been calculated the additional traffic from the development would add maximum delay of 6 seconds.

Highway Safety -
Two injury accidents have been recorded in the past 5 years; both at Station Road/New Road/School Road junction and were slight injuries. Both collisions were driver error; failing to look properly.

We raised concerns at pre-application stage there was a perception during the AM period, parents and children going to school are at risk as they congregate in the narrow footways adjacent to queuing traffic. A video survey was taken and it was observed there were no pedestrians taking 'unnecessary risks' or any safety issues were not observed.

Access and Internal Layout -
The proposed development access has 2 points of vehicular access into the Taylor Wimpey development. With this proposed development, there will be 255 dwellings served by a single access off Station Road. The Suffolk Design Guide states that there should be 2 access points for developments with over 150 dwellings. The TA for this application states that there is an emergency access point into the Industrial estate adjacent to the site. However, this is pedestrian link only, not vehicular. As the main access point is wide and the layout within the Taylor Wimpey site is looped, the extension to the site is not ideal but allowable.

This development would not have an unacceptable impact on highway safety (NPPF para 109) therefore, we do not object to the proposal.

CONDITIONS

Should the Planning Authority be minded to grant planning approval the Highway Authority in Suffolk would recommend they include the following conditions and obligations:

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.

ER 2 - Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details 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.

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.

TP1 - Condition: Prior to the occupation of any dwelling details of the travel arrangements to and from the site for residents of the dwellings, in the form of a Travel Plan in accordance with the mitigation measures identified in the submitted Framework Travel Plan (dated June 2019) shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority.
Reason: In the interest of sustainable development as set out in the NPPF

TP2 - Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.
Reason: In the interest of sustainable development as set out in the NPPF

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 electric vehicle charging points and 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 in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

B 2 - Condition: Before the development is commenced details of the areas to be provided for presentation and 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.

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

- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

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

NOTES

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. Please note, at present, there is no formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads for the Taylor Wimpey development.

The Travel Plan and Resident Travel Pack should be produced in accordance with Suffolk County Council's Travel Plan Guidance. Resident Travel Pack shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised Travel Planning and a multi-modal travel voucher.
www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/information-for-developers

S106 CONTRIBUTIONS

SCC consider it necessary to create a footway/cycle link between Woolpit and Elmswell and this junction is within the desired route. Therefore, we would be seeking a contribution of £50,000 to bring this scheme to fruition.

Passenger Transport section have requested a contribution of £50,000 towards improving community transport for the village which will provide sustainable travel opportunities for the residents of the site and further community.

Yours sincerely,

**Samantha Harvey**
**Senior Development Management Engineer**
Growth, Highways and Infrastructure

Suffolk County Council

**Suffolk Fire and Rescue Service**

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

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

Your Ref:
Our Ref: FS/F311031
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: http://www.suffolk.gov.uk

Date: 23/08/2019

Dear Sirs

**Land to the west of the former Bacon Factory, Elmswell IP30 9JH**
**Planning Application No: Dc/19/03924/OUT**
**Hydrants are required for this development**
**(see our required conditions)**

I refer to the above application.

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

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

**Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

**Sprinklers Advised**

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

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

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: Geoff.armstrong@arplanning.co.uk**Error! Bookmark not defined.**
Enc: Sprinkler information

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

Suffolk County Council

**Suffolk Fire and Rescue Service**

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

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

Your Ref:
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address www.suffolk.gov.uk

Date: 23 August 2019

**Planning Ref: DC/19/03924**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**
**ADDRESS: Land to the west of the former Bacon Factory, Elmswell IP30 9JH**
**DESCRIPTION: 65 Dwellings**
**HYDRANTS REQUIRED**

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

**If the Fire Authority is not consulted at the planning stage, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.**

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

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

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

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

Continued/

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

Your ref: DC/19/03924
Our ref: 59958
Date: 05 September 2019
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

**By e-mail only:**
planningyellow@baberghmidsuffolk.gov.uk

FAO Bradly Heffer

Dear Bradly,

**Re: Elmswell, Land To The West Of The Former Bacon Factory IP30 9U**

I refer to the above application for the Outline Planning Application (some matters reserved - access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2).

| Proposed number of dwellings from development: | Dwelling units | Total |
|---|---|---|
| | 65 | 65 |
| Approximate persons generated from proposal | 150 | 150 |

The Babergh and Mid Suffolk Joint Local Plan Preferred Options (Reg 18) is currently out for consultation. This site is not identified as a proposed allocation. At a local level Elmswell Parish Council are seeking to promote the delivery of a relief road and it is understood this scheme seeks to protect part of the 'corridor', however this is not part of the emerging Local Plan.

Schemes in the locality undetermined or recently approved:

a) Reference DC/19/03924 - this application 65 dwellings;
b) Reference DC/18/02146 – this application 105 dwellings;
c) Reference 0846/13 – former Grampian Harris site 190 dwellings;
d) Reference 4911/16 – land off Wetherden Road 240 dwellings;
e) Reference 3469/16 – Borley Crescent 60 dwellings;
f) Reference 4909/16 – land east of Warren Lane & west of Cresmedow Way 38 dwellings; and
g) Reference 0210/17 – land off Ashfield Road 112 dwellings

I set out below Suffolk County Council's infrastructure requirements relating to Education, Libraries and Waste.

1. **Education requirement:**
The local catchment schools are Elmswell CP School, Ixworth Free School and Thurston Community College. We currently forecast to have no surplus places at the catchment schools.

The strategy at the secondary school level is to expand Thurston Community College.

The earlier strategy at the primary school level responding to previous applications for planning permission is to expand the existing Elmswell Community Primary School by 105 places from its existing capacity of 315-places to 420-places. **However, this expansion project will not be able to deal with pupils arising from this proposed development.**

The draft strategy for the emerging Local Plan is for a new Primary School in Woolpit which could serve both villages and be accessed by a new Pedestrian/Cycle link, however should the District Council be looking to support more housing in Elmswell this strategy would need to be revisited.

The recent DfE guidance advises in paragraph 15 that costs of mainstream school places be based on "national average costs published annually in the DfE school place scorecards", to differentiate between the average per pupil cost of a new school, permanent expansion or temporary expansion, and that this average should be adjusted using BCIS location factors. The most recent scorecard is 2018 and the most recent (March 2019) BCIS location factor for the East of England is 100. The costs per place per pupil for permanent expansion/new schools are identified in the following table.

| School level | Minimum pupil yield: | Required: | Cost per place £ (2019/20): |
|---|---|---|---|
| Primary school age range, 5-11: | 16 | 16 | 20,788[1] |
| High school age range, 11-16: | 12 | 12 | 22,738 |
| Sixth school age range, 16+: | 3 | 3 | 22,738 |

| | |
|---|---|
| Total education contributions: | **£673,678.00[2]** |

[1] DfE scorecard and BCIS location factor £19,611 + Proportionate land contribution £1,177 per place = £20,788 / place
[2] See S106/CIL contribution split in section 8

2. **Pre-school requirement:**

This proposed development is in the Elmswell & Norton ward, where there is an existing deficit of places.

The early years strategy is to deliver a new setting in Elmswell, however should a site not be available, a new setting in Woolpit alongside the proposed new primary school. Therefore, to mitigate the impact of the 7 places required from this proposed development will require proportionate developer contributions to help fund a new early years setting. Therefore the 7 places arising from this development will require a contribution as set out in the table below:

| | Minimum number of eligible children: | Required: | Cost per place £ (2019/20): |
|---|---|---|---|
| Pre-School age range, 2-4: | 7 | 7 | 19,988 |

| | |
|---|---|
| Required pre-school S106 contributions: | **£139,916.00**[3] |

3. **Transport** issues are co-ordinated by Sam Harvey of Suffolk County Council, Transport Strategy.

4. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy and safe communities'. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

   Using the established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent at the local catchment library and allows for improvements and enhancements to be made to library services and facilities, and outreach activity.

| | |
|---|---|
| Libraries CIL contribution: | **£14,040.00** |

5. **Waste.** Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

   - New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste

[3] [3] DfE scorecard and BCIS location factor £19,611 + Proportionate land contribution £377 per place = £19,988 / place

management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

SCC requests £110 / per dwelling to the relocation of Stowmarket HWRC.

| | |
|---|---|
| Waste CIL Contribution: | **£7,150.00** |

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

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

8. **Summary Table – Community Infrastructure Levy**

| Service Requirement | Funding mechanism | Contribution per dwelling | Capital Contribution |
|---|---|---|---|
| Education - Primary | S106 | £5,117.05 | £332,608.00 |
| Education – Secondary | CIL | £4,197.78 | £272,856.00 |
| Education – Sixth Form | CIL | £1,049.45 | £68,214.00 |
| Pre-School | S106 | £2,152.55 | £139,916.00 |
| Transport - see section 3 above | | | |
| Libraries | CIL | £216.00 | £14,040.00 |
| Waste | CIL | £110.00 | £7,150.00 |
| **Total** | | **£12,842.83** | **£834,784.00** |

Please note the split between planning obligation requirements for the early years land and build costs, and primary school land and build costs, and CIL funding. Infrastructure that is to be funded by CIL will result in a future bid to the District Council if planning permission is granted and implemented.

I would be grateful if the above information can be provided to the decision-taker in respect of this planning application and infrastructure mitigation reported fully in the committee report.

Yours sincerely,

*P J Freer*

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Growth, Highways and Infrastructure - Strategic Development

**From:** James Rolfe <james.rolfe@suffolk.gov.uk>
**Sent:** 30 August 2019 11:05
**To:** Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>
**Cc:** BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
**Subject:** DC/19/03924 Elmswell, Land West of former bacon factory

Dear Bradley

Thank you for consulting us on this proposal. In my opinion there would be no significant impact on known archaeological sites or areas with archaeological potential due to the previous archaeological work carried out on the adjacent site and the large amount of disturbance to this site over the past 20 years.

Therefore I have no objection to the development and do not believe any archaeological mitigation is required.

Best wishes,

James Rolfe
Senior Archaeological Officer

Suffolk County Council Archaeological Service,
Bury Resource Centre,
Hollow Road,
Bury St Edmunds,
IP32 7AY

Tel.:01284 741225
Mob.: 07720210086
Email: james.rolfe@suffolk.gov.uk

Website: www.suffolk.gov.uk/archaeology
Suffolk Heritage Explorer: https://heritage.suffolk.gov.uk
Twitter Page: www.twitter.com/SCCArchaeology

**Our charges will be increasing on 1st April, the new charging schedule can be found** here.

**If you are contacting me regarding Development Management please quote the planning application number where possible.**

**From:** RM Floods Planning <floods.planning@suffolk.gov.uk>
**Sent:** 23 September 2019 13:13
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
**Cc:** Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>
**Subject:** 2019-09-23 JS reply Land To The West Of The Former Bacon Factory, Elmswell Ref DC/19/03924

Dear Bradly Heffer,

**Subject: Land To The West Of The Former Bacon Factory, Elmswell Ref DC/19/03924**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/03924

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions**:

• Site Location Plan Ref HARR181115 SLP-01 P9
• Site Location Plan Ref HARR181115 SLP-02 P1
• Illustrative Masterplan – 01 Ref HARR181115 IMP-01 P2
• Flood Risk Assessment Ref BFE-BWB-ZZ-XX-RP-YE-0001_FRA P04
• Sustainable Drainage Statement Ref BFE-BWB-ZZ-XX-RP-CD-0001_SDS P06
• Phase I and II Geoenvironmental Assessment, DQRA and Remediation Strategy

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
    a. Dimensioned plans and drawings of the surface water drainage scheme;
    b. Modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Qbar or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
    c. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
    d. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
    e. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
    f. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and

thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
    1. Temporary drainage systems
    2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
    3. Measures for managing any on or offsite flood risk associated with construction

g. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The scheme shall be fully implemented as approved.

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

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

2. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk*

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

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act 1991
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton
Flood & Water Engineer

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Bradley Heffer – Planning

From: Sacha Tiller – Housing Enabling

Date: 23.09.19 (amended from 04.09.19)

SUBJECT: DC-19-03924 – OUTLINE PLANNING APPLICATION

Proposal: Outline Planning Application (some matters reserved – access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings and with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)

Location: Land to the West Of The Former Bacon Factory, Elmswell – DC-19-03924

---

**Key Points**

1. **Background Information**

| |
|---|
| An outline development proposal for up to 65 residential dwellings. |
| This is an open market development and based on 65 units should offer 22 affordable housing units = 35% policy compliant position. |

2. **Housing Need Information:**

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. **Ref1**

2.3 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.4 The Council's Choice Based Lettings system currently has circa. 690 applicants registered for affordable housing in Mid Suffolk as at April 2019. **Ref4**



**Ref1: SHMA 2019, p.122, Summary section** **Ref4: Gateway to Homechoice data 2019**

Please note that this site is a S106 planning obligation site therefore the affordable housing provided will be to meet district wide need hence the **690** applicants registered is the important number.

**3. Preferred Mix for Open Market homes.**

3.1 There is strong need for home more suited to the over 55 age brackets within the district and the supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. Mid Suffolk and the county as a whole faces a large increase in the population of over 65-year olds so we need to ensure there are suitable housing choices for older people to remain in their communities.

3.2 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities.

3.3 Broadband and satellite facilities as part of the design for all tenures should be standard to support.

3.4 All new properties need to have high levels of energy efficiency.

3.5 Details of the mix of type and size of the all the dwellings to be submitted to and approved in writing by the local planning authority.

**Proposed open marketing housing – 65 dwellings**

Due to the lack of detailed information provided at outline approval it is not possible to see the type, size, location of any of the proposed dwellings. Therefore at this stage we are unable to calculate whether the housing mix that will be provided will be suitable and complement the current housing need for this district. We look forward to a detailed plan showing this.

**4. Preferred mix for Affordable Housing – 22 A/H out of 65 O/M = (35%)**

4.1 The majority district wide need is for 1 and 2 bedroom dwellings followed by 3 beds with a much smaller need for 4+ bedrooms.

4.2 The current Gateway to Homechoice shows 32 applicants registered have a connection with Elmswell, Mid Suffolk. A majority of these require 1 and 2 bedroom dwellings, with some need for 3 and 4 bed dwellings. Over 28% are aged over 55+ and therefore it would be desirable for a selection of sheltered or bungalow style accommodation.

**Required affordable rent = 17**

- 2 x 1b 2 person flat @ 50sqm
- 2 x 2b 4 person flats @70sqm
- 6 x 2b 4 person bungalows 70sqm
- 3 x 2b 4 person houses @79sqm
- 4 x 3b 5 person houses @93sqm



**Ref1: SHMA 2019, p.122, Summary section** **Ref4: Gateway to Homechoice data 2019**

**Shared Ownership = 5**

- 3 x 3b 5 person houses @93sqm
- 2 x 2b 4 person houses @75sqm

**5. Other requirements for affordable homes:**

- Properties must be built to current Homes England National Housing Standards March 2015.

- The council is granted 100% nomination rights to all the affordable units on first lets and 100% on subsequent lets.

- Any Shared Ownership properties must have an initial share limit of 70%.

- The Council will not support a bid for Homes England grant funding on the affordable homes delivered as part of an open market development. Therefore, the affordable units on that part of the site must be delivered grant free.

- The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.

- (a) not Occupy or permit Occupation of more than fifty per cent (50%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (50%) of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider; and

- (b) not Occupy or permit Occupation of more than eighty per cent (80%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until all of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider

- On larger sites, the affordable housing should not be placed in groups of more than 15 units

- Adequate parking provision is made for the affordable housing units and cycle storage and bin stores.

- It is preferred that the affordable units are transferred to one of the Council's partner Registered Providers – please see www.baberghmidsuffolk.gov.uk under Housing and Affordable Housing for full details.



**Ref1: SHMA 2019, p.122, Summary section** **Ref4: Gateway to Homechoice data 2019**

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Bradly Heffer - Planning

From: Sacha Tiller - Housing Enabling Officer – Strategic Planning

Date: 4th September 2019

Application Ref**: DC/19/03924**

Proposal: Outline Planning Application (some matters reserved – access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings and with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)

Location: Land To The West Of The Former Bacon Factory, Elmswell – DC/19/03924

---

**Key Points**

1**. Background Information**

| |
|---|
| • An outline development proposal for up to 65 residential dwellings. |
| • This is an open market development and based on 65 units should offer 22 affordable housing units = 35% policy compliant position. |

2. **Housing Need Information:**

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **97 new affordable homes per annum. Ref1**

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

| **Ref2** **Estimated proportionate demand for affordable new housing stock by bedroom number** | |
|---|---|
| Bed Nos | % of total new affordable stock |

| | |
|---|---|
| 1 | 46% |
| 2 | 36% |
| 3 | 16% |
| 4 | 2% |

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

| **Ref3 Estimated proportionate demand for all tenure new housing stock by bedroom number** | |
|---|---|
| Bed Nos | % of total new stock |
| 1 | 18% |
| 2 | 29% |
| 3 | 46% |
| 4+ | 6% |

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa. 730 applicants registered for affordable housing in Mid Suffolk as at March 2019.

**3. Preferred Mix for Open Market homes.**

3.1 There is a strong need for homes more suited to the over 55 age brackets within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. Mid Suffolk and the county as a whole faces a large increase in the population of over 65-year olds so we need to ensure there are suitable housing choices for older people to remain in their communities.

3.2 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities.

3.3 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.

- Although this is not their first preference, many accept that the private rented sector is their most realistic option.

- 25% of households think their current property will not be suitable for their needs in 10 years' time.

- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

- The affordable housing should be integrated into the scheme and not placed in one area however looking at the plan layout most of the proposed affordable housing does seem to be in one area.

**Total number of proposed open marketing housing = 65 dwellings**

Looking at the information provided in the outline application this makes no mention of the type, size or number of any of the open market or affordable housing dwellings. Therefore at this stage we are unable to calculate whether the mix being proposed is suitable to meet the current housing need for the district for open market and affordable housing dwellings.

**4: Affordable Housing Mix:**

4.1 The majority district wide need is for 1 and 2 bedrooms followed by 3 beds with a much smaller need for 4+ beds.

4.2 The current gateway to home choice housing need data shows 32 people are currently looking for a home in Elmswell – Mid Suffolk. A majority of these require 1 and 2 bedroom dwellings, with some need for 3 and 4 bed dwellings. Over 28% are aged over 55+ and therefore it would be desirable for a selection of sheltered or bungalow style accommodation.

4.3 The developer would need to provide 22 affordable and shared ownership houses and we would ask for the mix to be:

Required affordable Rent = 17

- 2 x 1b 2 person flat @ 50sqm
- 2 x 2b 4 person flats @ 70sqm
- 6 x 2b 4 person bungalows @ 70sqm
- 3 x 2b 4 person houses @ 79sqm
- 4 x 3b 5 person houses @ 93sqm

Required shared Ownership = 5

- 3 x 3b 5 person houses @ 93sqm
- 2 x 2b 4 person houses @ 75sqm

**5. Other requirements for affordable homes:**

- Properties must be built to the Housing Standards Technical guidance March 2015 and Nationally Described Space Standards.

- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 75% of relets in perpetuity.

- For all shared ownership dwellings applicants must be registered with the Suffolk Homebuy agency.

- Initial share purchases for shared ownership dwellings to be capped at 75%.

- The affordable units to be constructed ‘tenure blind’ and must not be in clusters of more than 15 dwellings. The affordable homes should be distributed across the different phases of the development.

- Adequate parking provision is made for the affordable housing units and cycle storage/sheds.

# Consultee Comments for Planning Application DC/19/03924

**Application Summary**
Application Number: DC/19/03924
Address: Land To The West Of The Former Bacon Factory Elmswell
Proposal: Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)
Case Officer: Bradly Heffer

**Consultee Details**
Name: Mr Tony Bass
Address: Endeavour House, Ipswich IP1 2BX
Email: tony.bass@baberghmidsuffolk.gov.uk
On Behalf Of: Communities (Major Development)

**Comments**
This application needs to take into account the views on the Elmswell Parish Council in regards to its provision of Open Space, sport and recreation as this is currently being strategically considered by them.

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>
Sent: 11 September 2019 13:25
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/19/03924

Hello Planning Support

The Public Realm Team support the inclusion of three local play areas within the open space associated with the proposed development. It would be anticipated that local management of the public open space would be sought as the District Council would not seek to adopt these open spaces due to their very local value.

Regards

Dave Hughes
Countryside and Public Realm
Babergh & Mid Suffolk District Councils – Working Together

Tel 01449 724639
Mob 07990 542090
Email: david.hughes@baberghmidsuffolk.gov.uk
Websites www.midsuffolk.gov.uk www.babergh.gov.uk

**Planning Application – Consultation Response**

| | |
|---|---|
| **Planning Application Reference:** | DC/19/03924 |
| **Site:** | Land to The West of The Former Bacon Factory Elmswell |
| **Proposal:** | Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2) |
| **Prepared by:** | BMSDC Strategic Planning Policy and Infrastructure |
| **Date:** | 03/10/2019 |

1. **Policy position**
   The site in question would further expand Elmswell to the west, which is considered a unnecessary major addition to an already expanded settlement. Equally it is noted there are ponds and a moat within the immediate surrounding vicinity to the north and west of the site. Which forms significant material consideration from a ecology/biodiversity, landscape, heritage and setting value to the area that should be comprehensively assessed. The proposal is not encouraged or supported. Cumulatively, the proposal would cause impacts on infrastructure.

2. **Infrastructure Delivery Plan (IDP) position**
   The IDP (July 2019) sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 22nd July 2019 as evidence which supports the Joint Local Plan and is an iterative document which will change over time dependant on changing infrastructure capacity, requirements and priorities.

   The proposed development is not part of the proposed site allocations of the emerging Joint Local Plan. For the purpose of this response, and to understand the impact on infrastructure capacity, the content of the IDP has been considered together with the existing planning permissions and responses from infrastructure providers.

   These are the current planning applications (over 10 dwellings) and emerging Joint Local Plan land allocations in Elmswell, and because it is of relevance, the applications for Woolpit are also listed:

   Elmswell - Existing Permissions (634 dwellings)
   - 0846/13 former Grampian Harris site - 190 dwellings (under construction)
   - 0210/17 – Land To The East Of Ashfield Road - 106 dwellings (awaiting decision on Reserved Matters)
   - 4911/16 – Land adjacent to Wetherden Road - 240 dwellings (Full planning permission obtained October 2018)
   - 3469/16 – Land to the East of Borley Crescent - 60 dwellings (Full planning permission obtained June 2019)
   - 4909/16 – Land east of Warren Lane & west of Cresmedow Way - 38 dwellings (Outline planning permission obtained June 2018)

   Elmswell - Planning applications awaiting determination (105 dwellings)
   - DC/18/02146 – 105 dwellings (Emerging JLP LA065)

Elmswell - Emerging Joint Local Plan site allocations (not under application) (160 dwellings)

- LA064 - Land north of Church Road – 60 dwellings
- LA066 - Land west of Station Road – 100 dwellings

Woolpit - Existing Permissions (169 dwellings)

- 1636/16 Land south of Old Stowmarket Road – Outline permission for 120 dwellings (Emerging JLP LA094)
- 2112/16 Land On East Side Of Green Road – Full permission for 49 dwellings (Emerging JLP LA093)

Woolpit - Planning applications awaiting determination

- DC/18/04247 Land Off Bury Road The Street – Outline application for 300 dwellings (Southern section of LA095)

Woolpit - Emerging Joint Local Plan site allocations (not under application) (540 dwellings)

- LA095 Land south of A14, north east of The Street and east of White Elm Road - 500 dwellings (300 dwellings under application as per above). With land allocation for pre school and primary school.
- LA096 – Land north east of Heath Road, adjacent to Woolpit Primary School – 10 dwellings
- LA097 - Land west of Heath Road – 30 dwellings

There are several essential infrastructure needs for Elmswell that are identified:

- <u>Education</u>
  The IDP states that within Elmswell a new Pre School setting for 30 places is needed with proposed land allocation on LA065. This need is further amplified by this proposal to alleviate the need for the children to be accommodated at the new pre-school setting in Woolpit. The expansion of Elmswell Community Primary School from 315 to 420 places is planned, however, as stated by the County Council in their response of the 05/09/2019, this expansion project will not be able to deal with pupils arising from this proposed development as existing permissions have absorbed this additional capacity. A new primary school is to be provided in Woolpit to supply growth of Elmswell and Woolpit. This new Primary School would have the potential to provide for this development together with the committed growth and Joint Local Plan proposed allocations. For the secondary school provision, the expansion of Thurston Community College from 1940 to 2190 places is planned.

- <u>Transport</u>
  The IDP states that within Elmswell, new footway links, traffic calming measures and bus stops improvements would be required where necessary. Specific site details and required contributions are provided through the County Council Highway response. The IDP also refers to contributions towards a new cycle/pedestrian link between Elmswell and Woolpit, for which the County Council Highways response requires developer contributions. This currently cannot be provided through CIL and it would be appropriate to seek s106 contributions. Potential highways improvements at the junction of School Road and Church Road may also be required.

- <u>Health</u>
  For Elmswell the nearest practice is Woolpit Health Centre, where the IDP refers to expansion of the practice and CIL contributions would be required.

It will be essential that the above points are considered in conjunction with the current application process and infrastructure needs must be satisfactorily addressed in accordance with the respective infrastructure providers consultation replies and the IDP.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

# Consultation Response Pro forma

| | | | |
|---|---|---|---|
| **1** | **Application Number** | DC/19/03924<br>West of former bacon factory, Elmswell | |
| **2** | **Date of Response** | 11.9.19 | |
| **3** | **Responding Officer** | Name: | Paul Harrison |
| | | Job Title: | Heritage and Design Officer |
| | | Responding on behalf of... | Heritage |
| **4** | **Summary and Recommendation**<br>(please delete those N/A)<br><br>Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | 1. The Heritage Team considers that the proposal would cause<br>• less than substantial harm to a designated heritage asset because it would further erode the rural character of the setting of Elmswell Hall<br>• the level of harm would be considered low<br>2. Special regard should be had to preserving the setting of the listed building, and any harm should be given great weight and weighed against public benefits of the scheme.<br>3. If the recommendation is favourable, steps should be taken to avoid or minimise harm by means of layout, landscaping and distribution of house types. | |
| 5 | **Discussion**<br>Please outline the reasons/rationale behind how you have formed the recommendation.<br>Please refer to any guidance, policy or material considerations that have informed your recommendation. | The site lies at the edge of the settlement which in recent years has spread into the site of the former bacon factory. The site was previously used in association with the bacon factory.<br><br>The Hall is a 1500s manor house re-worked in the early 1800s with simple and modest facades in local white brick. It retains direct visual relationship with the Church and almshouses to the south. Despite the growth of Elmswell, the setting of the Hall is predominantly rural and makes a considerable contribution to its significance. Surrounding farmland contributes to appreciating its role as a farmhouse. The application site was originally associated with the Hall as part of its farmed land, but the site was latterly in industrial use, albeit without built development.<br><br>The proposal would bring built development somewhat nearer to the listed Hall but without extending the visual arc from the point of view of the Hall.<br><br>The proposal would erode the rural character of the Hall's setting, but factors noted above would limit impact on the Hall's setting to a low level. | |

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

| | | |
|---|---|---|
| 6 | **Amendments, Clarification or Additional Information Required** (if holding objection)<br><br>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate | |
| 7 | **Recommended conditions** | If the recommendation is favourable, steps should be taken to avoid or minimise harm by means of layout, landscaping and distribution of house types. |

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Chief Planning Control Officer For the attention of: DM

FROM: Nathan Pittam, Environmental Protection Team DATE: 09/09/19

YOUR REF: DC/19/03924

SUBJECT: Outline Planning Application (some matters reserved - access to be considered) for site remeditation works (Phase 1) & erection of up to 65 dwellings etc

Address: Land Adjacent To Elmtree Business Park, Station Road Industrial Estate, Elmswell, BURY ST EDMUNDS, Suffolk.

---

**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 Environmental Protection Team."*

Nathan Pittam
Senior Environmental Management Officer

**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>
**Sent:** 09 September 2019 15:41
**To:** Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>
**Subject:** DC/19/03924

**APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/19/03924**
**Proposal:** Outline Planning Application (some matters reserved - access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2) **Location:** Land To The West Of The Former Bacon Factory, Elmswell

Noise/Odour/Light/Smoke

Thank you for the opportunity to comment on this reserved matters outline planning application. Having studied the submitted documents and the Spectrum Acoustic outline planning assessment ref: JW1695/18447/4 , I have no objections in principle. However; as there are no design and layout plans for the site, I ask that the following is conditioned:

1. The reserved matters application relating to design and layout of residential dwellings shall include a detailed acoustic assessment and Acoustic Design Statement (that includes evaluation and selection of mitigation methods, PROPG), produced by a competent person, which provides details of the noise exposure at the facade of residential dwellings, internal noise levels in habitable rooms and noise levels in all associated amenity spaces. The design and layout should avoid exposure of habitable rooms to noise levels that exceed the following criteria:

   - 60dBLAeq 16 hours (daytime, 07:00-23:00, outside)
   - 55dBLAeq 8 hours (night, 23:00-07:00, outside)

   As required to meet the above, acoustic barriers and site design, including building orientation and internal layout of dwellings, shall be used to minimise noise exposure to habitable rooms and reduce the need to rely on closed windows.

   Where the facade noise levels outside of habitable rooms do not exceed those stated above, but the internal noise levels stated in the current version of BS8233 are exceeded with windows open, enhanced passive ventilation with appropriate sound insulating properties shall be provided to ensure compliance with the current version of BS8233 with windows closed and that maximum internal noise levels at night do not exceed 45dBA on more than 10 occasions a night.

   If exposure exceeds the noise levels stated above, significantly enhanced ventilation will be required, and will need to be proposed, with any reliance upon building envelope insulation with closed windows to be justified in supporting documents that cross reference the mitigation measures used and the evaluation of different designs, layouts and sound reduction methods (including barriers) considered during the design process.

   In addition, noise levels in external amenity spaces shall not exceed 55dBLAeq 16 hours, daytime. The development shall thereafter be carried out in accordance with any details approved, and shall be retained in accordance with these details thereafter.

2. Prior to the commencement of development a Construction Method Statement shall be submitted in writing to the local planning authority for approval. The CMS shall include mitigation of dust and noise including proposed working hours. Recommended hours for any noisy activities are
the following times: Weekdays: 08:00 to 18:00, Saturdays: 09:00 to 13:00, Sundays and Public Holidays: None

Regards

*Andy*

**Andy Rutson-Edwards**, MCIEH AMIOA

Senior Environmental Protection Officer

**Babergh and Mid Suffolk District Council - Working Together**

Tel: 01449 724727

Email andy.rutson-edwards@baberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

**From:** Peter Chisnall <Peter.Chisnall@baberghmidsuffolk.gov.uk>
**Sent:** 10 September 2019 15:37
**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
**Subject:** DC/19/03924

Dear Bradly,

**Proposal:** Outline Planning Application (some matters reserved - access to be considered) for
site remeditation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)
**Location:** Land To The West Of The Former Bacon Factory, Elmswell,

Many thanks for your request to comment on the above application.

Having reviewed the documents the applicant has included some sustainability and energy related items in the planning design and access statement, however these are minimal.

I have no objection to the proposal subject to the following:

We request a condition is added should permission be granted and offer the following wording:

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

The Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3 SO8 and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water ( suggested maximum of 105ltr per person per day). Details as to the provision for electric vehicles should also be included.

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Clear commitments and minimum standards should be declared and phrases such as ‘where possible, subject to, where feasible’ must not be used.

Evidence should be included where appropriate demonstrating the applicants previous good work and standards achieved in areas such as site waste management, eg what recycling rate has the applicant achieved in recent projects to show that their % recycling rate commitment is likely.

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential

to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

Guidance can be found at the following locations:
https://www.midsuffolk.gov.uk/environment/environmental-management/planning-requirements/
https://www.babergh.gov.uk/environment/environmental-management/planning-requirements/

Regards,

Peter

**Peter Chisnall**, CEnv, MIEMA, CEnvH, MCIEH
Environmental Management Officer
**Babergh and Mid Suffolk District Council - Working Together**
Tel: 01449 724611
Email: peter.chisnall@baberghmidsuffolk.gov.uk
www.babergh.gov.uk  www.midsuffolk.gov.uk

**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
**Sent:** 03 September 2019 13:32
**To:** Bradly Heffer <Bradly.Heffer@baberghmidsuffolk.gov.uk>
**Cc:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
**Subject:** DC/19/03924. Air Quality

Dear Bradly

**EP Reference : 264872**
**DC/19/03924. Air Quality**
**Land To The West Of The Former Bacon Factory**
**Outline Planning Application (some matters reserved - access to be considered) for site remeditation works (Phase 1) and the erection of up to 65 dwellings etc**

Many thanks for your request for comments in relation to the above application. I can confirm that I have no objection to the proposed development from the perspective of air quality.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: Nathan.pittam@baberghmidsuffolk.gov.uk
Work: 07769 566988 / 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk

RTPI AWARDS FOR PLANNING EXCELLENCE FINALIST 2019

iese Awards BRONZE Winner 2019
10TH ANNIVERSARY OF The Public Sector Transformation Awards

# Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email planningliaison@anglianwater.co.uk.

| | |
|---|---|
| AW Site Reference: | 151484/2/0067747 |
| Local Planning Authority: | Mid Suffolk District |
| Site: | Land To The West Of The Former Bacon Factory Elmswell |
| Proposal: | Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with associated landscaping (Phase 2). |
| Planning application: | DC/19/03924 |

**Prepared by:** Pre-Development Team

**Date:** 26 September 2019

## ASSETS

### Section 1 - Assets Affected

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

The foul drainage from this development is in the catchment of Elmswell Water Recycling Centre that will have available capacity for these flows

## Section 3 - Used Water Network

Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. We are exploring options for a Foul Water strategy to serve this development. We therefore request a condition requiring phasing plan and/or on-site drainage strategy (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

## Section 4 - Surface Water Disposal

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.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

## Section 5 - Suggested Planning Conditions

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

## Used Water Sewerage Network (Section 3)

We have no objection subject to the following condition: Condition Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme. Reason To prevent environmental and amenity problems arising from flooding

## FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:

### Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website http://www.anglianwater.co.uk/developers/pre-development.aspx

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

### Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
  - Development size
  - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
  - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

**Place Services**
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH

**T:** 0333 013 6840
**www.placeservices.co.uk**

10 September 2019

Bradly Heffer
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

---

*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

---

**Application:** **DC/19/03924**
**Location:** **Land To The West Of The Former Bacon Factory Elmswell**
**Proposal:** **Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2)**

Dear Bradly,

Thank you for consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancements**

**Summary**
We have reviewed the Ecological Assessment (Ecology Solutions Ltd, June 2019), provided by the applicant, relating to the likely impacts of development on designated sites, protected and priority species/habitats.

We are satisfied that sufficient ecological information is available for determination. This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable. We recommend that these mitigation measures are set out within a Biodiversity Method Statement, to allow the mitigation measures to be clearly followed during the construction phase of the development. This should include provision of the reptile mitigation strategy, which provides indication of an appropriate receptor site following Gov.uk Guidelines.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured concurrent to reserved matters. This shall include the locations of the proposed hedgehog highways, bird / bat boxes and reptile hibernaculum.

This enables the LPA it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

**Recommended conditions:**

1. **CONCURRENT WITH RESERVED MATTERS: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN**
   *"A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority.*

   *The content of the LEMP shall include the following:*
   - *a) Description and evaluation of features to be managed.*
   - *b) Ecological trends and constraints on site that might influence management.*
   - *c) Aims and objectives of management.*
   - *d) Appropriate management options for achieving aims and objectives.*
   - *e) Prescriptions for management actions.*
   - *f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
   - *g) Details of the body or organisation responsible for implementation of the plan.*
   - *h) Ongoing monitoring and remedial measures.*

   *The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

   **Reason**: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

2. **CONCURRENT WITH RESERVED MATTERS: BIODIVERSITY ENHANCEMENT STRATEGY**
*"A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Enhancement Strategy shall include the following:*
   *a) Purpose and conservation objectives for the proposed enhancement measures;*
   *b) detailed designs to achieve stated objectives;*
   *c) locations of proposed enhancement measures by appropriate maps and plans;*
   *d) persons responsible for implementing the enhancement measures;*
   *e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."*

**Reason**: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

3. **PRIOR TO COMMENCEMENT: BIODIVERSITY METHOD STATEMENT**
*"No development shall take place (including any demolition, ground works, site clearance) until a Biodiversity Method Statement has been submitted to and approved in writing by the local planning authority.*

*The content of the method statement shall include the following:*
   *a) purpose and objectives for the proposed works;*
   *b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);*
   *c) extent and location of proposed works shown on appropriate scale maps and plans;*
   *d) persons responsible for implementing the works;*
   *e) initial aftercare and long-term maintenance (where relevant);*
   *f) disposal of any wastes arising from works.*

*The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."*

**Reason***:* To conserve Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended, s40 of the NERC Act 2006 (Priority habitats & species) and s17 Crime & Disorder Act 1998.

4. **PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**
"*A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, lsolux drawings and technical specifications)*

*so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

**Reason**: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson GradCIEEM BSc (Hons)**
Ecological Consultant
ecology.placeservices@essex.gov.uk

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**Place Services**
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
**T:** 0333 013 6840
**www.placeservices.co.uk**
@PlaceServices

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

15/11/2019

For the attention of: Daniel Cameron

**Ref: DC/19/03924 - Land To The West Of The Former Bacon Factory, Elmswell**

Thank you for re-consulting us on the Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2).

This letter sets out our consultation response on the landscape impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site. At present, we recommend a **holding objection** is placed on the application until the following information is provided or amendments are made:

At present, the Soft Landscaping Plan (Drawing ref: 03000 Rev. PL02) provides details of the proposed tree planting and native hedge planting on the western and northern boundaries. Although the addition of the native shrub planting is welcomed, Common Elder (*Sambucus nigra*) should not be specified as part of the shrub mix, as the shrub is very vigorous and will supress the growth of the other species specified. As an alternative, we would recommend including some native shrub species such as wild cherry, hornbeam or hazel.

The revised Soft Landscape Strategy (Drawing ref: 03000 Rev. PL02) shows a landscape buffer on the western edge which is welcomed. However, it is unclear whether this compliant to the 10m width previously recommended? If so, we would advise the illustrative masterplan and associated drawings are amended accordingly.

Our consultation response dated 22/10/2019 recommends that an illustrative masterplan with plot details is submitted along with further details of how the POS to the north of the site will be used if the link road does not go ahead needs to be provided. At present, no further information on these themes has been provided so we are unable to provide further comments until revised versions are submitted.

**As previously recommended, in the event that approval of this outline application is forthcoming then the following reserved matters conditions should be considered:**

1. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.**
   No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

2. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.**

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting. Tree pit details will also need to be provided for the different planting environments proposed i.e. planted in hard landscaping, close to road boundaries and within the public open space (POS).

3. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS**
   Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

4. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING.**
   Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other constriction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

If you have any queries regarding the above matters, please let me know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils**. Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**Place Services**
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
**T:** 0333 013 6840
**www.placeservices.co.uk**
@PlaceServices

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

22/10/2019

For the attention of: Daniel Cameron

**Ref: DC/19/03924 - Land To The West Of The Former Bacon Factory Elmswell**

Thank you for consulting us on the Outline Planning Application (some matters reserved - access to be considered) for site remediation works (Phase 1) and the erection of up to 65 dwellings with the safeguarding of land for potential future delivery of a relief road, public open space and associated landscaping (Phase 2).

This letter sets out our consultation response on the landscape impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site. At present, we recommend a **holding objection** is placed on the application until the following information is provided or amendments are made:

The site sits within the Ancient Plateau Claylands character area (Suffolk County Council Landscape Character Assessment) and although the value of this landscape receptor varies from low to high, the land management guidelines recommend that stock of hedgerow trees is maintained and increased, and hedgerows are planted and restored. For this reason, we would expect the landscape buffer on the western boundary to be as extensive as the boundary proposed on the northern boundary to ensure the site is sympathetic to the surrounding landscape. At present, the Soft Landscape Strategy (Drawing ref: 03000) provides details of the proposed tree planting on the western and northern boundaries. Although this is welcomed, we would recommend this is accompanied by native shrub planting and an associated buffer of approximately 10metres beyond the highway to support visual and landscape impact mitigation and also create a north-south corridor for recreational use.

At present, there is a concern that the density of housing will create an urban character. However, given the sites edge of settlement location we would expect a medium density of housing in the area closest to the existing development. Then a lower density on the site edge to ensure a village/green edge character can be achieved. Although the current illustrative masterplan (Drawing reference: IMP-01 P2) is valuable, we would recommend an amended illustrative masterplan with plot details is submitted to ensure the housing numbers are achievable, and the associated density is appropriate for the site's location.

The Design and Access Statement (DAS) makes reference to the amount of Public Open Space (POS) being provided. This includes the area set aside for the potential link road and the area surrounding the attenuation basin. If this is the case, further details of how this area will be used if the link road does not go ahead needs to be included. For instance, will the attenuation basin area be fenced? Will made footpaths be provided?

**In the event that approval of this outline application is forthcoming then the following reserved matters conditions should be considered:**

1. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.**
   No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

2. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.**
   No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting. Tree pit details will also need to be provided for the different planting environments proposed i.e. planted in hard landscaping, close to road boundaries and within the public open space (POS).

3. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS**
   Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

4. **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING.**
   Before any works commence on site, details of advance planting shall be submitted and approved by the Local Planning Authority. Implementation shall be carried out prior to any other constriction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

If you have any queries regarding the above matters, please let me know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils**. Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Dear Bradly,

Thank you for consulting me about the proposed residential development on Land to the West of the Former Bacon Factory in Elmswell. I will be providing some comments on the Travel Plan that was submitted, however it will form part of the formal Suffolk County Council Highway response that Sam Harvey is leading on to comply with internal protocol.

Kind regards

**Chris Ward**
Travel Plan Officer
Transport Strategy
Strategic Development - Growth, Highways and Infrastructure
Suffolk County Council