

PARISH COUNCIL

Comments from the Elmswell Parish Clerk

Planning Officer: Rebecca Biggs
Application number: 3918/1
Proposal: Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout & Scale for the development which includes the erection of 190 residential dwellings
Location: Former Grampian Harris site, St Edmunds Drive, Elmswell IP30 9HF

Councillors object to this application for the following reasons:

1 The disappointing proportion of Affordable Houses reinforces the need, as identified by the emerging Elmswell Neighbourhood Plan and by community feedback, for 'starter home' housing stock. Accordingly, the imbalance in favour of larger dwellings - 33% being 3 bed dwellings, 33% being 4 bed dwellings & 10% being 5 bed dwellings - does not adequately reflect the community's needs. It is felt that 9 No 1 bed dwellings or flats should be included in the housing mix by reducing each of these larger dwelling allocations by 3 dwellings each.

This is seen as better serving the NPPF stricture whereby opportunities should be sought to meet the development needs of the area with regard to objectively assessed need and where developments should be planned with a mix of housing to meet the needs of different groups in the community, reflecting local demand.

Further, it relies upon the Core Strategy Objectives 6 & 7 which seek to enable communities to be balanced and inclusive, respecting diversity in function and character.

Local Plan Policy H14 reinforces the need for a range of dwellings catering for different accommodation needs.

2 The concerns expressed by the Environment Agency with reference to the lack of land contamination information, taken together with the issues raised by SCC Resource Management with regard to the lack of SuDS compliance and the fact that the proposed surface water drainage system does not appear to reach local or national standards, all come together to raise serious reservations with regard to this element of the proposal in light of the protection which must be afforded to the River Blackbourne.

Local Plan Policy CL4 encourages the conservation of the ecological qualities of our rivers and must be properly addressed.

3 The need for attenuation of nuisance sound, in particular from the railway adjacent to plots 55 - 65 inclusive, must be detailed, as per Condition 10 of the OPP, and must be to the satisfaction of Officers. A scheme has not yet been submitted and this is an essential requirement before permission is granted

4 There is no Travel Plan submitted. The site will impose further strain on the travel infrastructure of Elmswell and Condition 14 of the OPP reflects the importance of this element of the development proposal. As at 3 above, this must be detailed to the satisfaction of Officers prior to Approval.

OBJECT

X

Peter Dow
Clerk to Elmswell Parish Council
12.02.16

PARISH COUNCIL

Comments from: Wetherden Parish Clerk

Planning Officer: Rebecca Biggs

Application Number: 3918 / 15

Proposal: Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout & Scale for the development which includes the erection of 190 residential dwellings

Location: Former Grampian Harris site, St Edmunds Drive, Elmswell IP30 9HF

PLEASE SET OUT ANY COMMENTS AND OBSERVATIONS OF YOUR COUNCIL WITH REGARD TO THE ABOVE, BEARING IN MIND THE POLICIES MENTIONED IN THE ACCOMPANYING LETTER.

Wetherden Parish Council objects to this application based on the following grounds: The increase in the volume of traffic generated by 190 new homes will impact significantly on the village of Wetherden. Stretches of the link road between Elmswell and Wetherden are notorious accident spots with excess speeding a current local concern that with the inevitable increase in traffic flow will be exasperated. With no provision in this outline application for a relief road taking traffic north and away from the villages to the main artery A14 the Grove Lane rat run and Elmswell Road will become a target route towards Stowmarket which will have serious increase in traffic consequences for Wetherden residents. Services and Infrastructure policies within the Mid Suffolk Core Strategy indicate that further consideration needs to be given to the provision of a relief road together with additional speed restrictions on the Elmswell road and the provision of a safe pedestrian and cycle route to link the two villages. Concern is expressed at the ability of the local health clinic at Woolpit to absorb the additional need that will be presented by 190 homes. It is challenging at present to get an appointment within 2 weeks and the current site restrictions provide difficult parking conditions. Of considerable concern is the position regarding local primary schools with the move to two-tier education. Elmswell Primary School will already be at its capacity with an additional two years intake and this proposal will only reduce further Wetherden children's choice of primary education. It is also felt that the current safety concerns regarding the entrance to the Cooperative retail site will be amplified. This is a major resource for Wetherden residents and one it will prove more and more difficult to access. It is felt that this proposal is not currently sustainable and failure to address these problems is contrary to Mid Suffolk Local Plan policies T2, T4, T10 and T11 and Core Strategy CS6.

Jen Lerner (Clerk)

.....(Print Name)

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Wetherden

on behalf of/parish council

Dated.....20 January 2016

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3918/15

Michelle Windsor

From: sandra brown <sandra_brown60@hotmail.com>
Sent: 31 January 2016 19:33
To: Planning Admin
Subject: Application 3918/15 FAO Rebecca Biggs
Categories: Green Category

Planning Control Received	
31 JAN 2016	
Acknowledged	<i>MW</i>
Date	<i>01.02.16</i>
Pass To	<i>RB</i>

Dear Rebecca,

Re: Application No: 3918/15 Former Grampian Harris site, St Edmunds Drive, Elmswell - Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout & Scale for the development which includes the erection of 190 residential dwellings - **Great Ashfield Parish Council Object to this planning application** due to the scale of the proposal which will increase traffic congestion in the vicinity. It is already difficult to travel from Great Ashfield to the A14 through Elmswell due to the existing traffic congestion issues. This will be further exacerbated with the single access from this site together with the increase in train traffic.

Kind Regards,
Sandra
Clerk to Great Ashfield Parish Council

AMENDED PLANS CONSULTATION**PARISH COUNCIL****COMMENTS FROM GREAT ASHFIELD PARISH COUNCIL**

Planning Officer: Rebecca Biggs

Application No: 3918/15

Proposal: Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout and Scale for the development which includes the erection of 190 residential dwellings

Location: Former Grampian Harris site, St Edmunds Drive, Elmswell IP30 9HF

Great Ashfield Parish Council **object** to this application with the following comments:

Due to the scale of the proposal this will increase the traffic congestion in the vicinity. It is already difficult to travel from Great Ashfield to the A14 through Elmswell due to the existing traffic congestion; this will be further exacerbated with the single access from this site together with the increase in train traffic. Safety concerns at the entrance to the co-op retail store will be intensified with the increase in use. The Council also felt the local health clinic at Woolpit will have difficulty coping with the large increase in population.

Consultation Response Pro forma

1	Application Number	3918/15 former Grampian Harris site, Elmswell	
2	Date of Response	1.3.16	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage Enabling Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) 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 has no comments to make on this proposal.	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.		
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
7	Recommended conditions		

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.

From: David Pizzey
Sent: 12 January 2016 10:50
To: Rebecca Biggs
Cc: Planning Admin
Subject: 3918/15 Former Grampian Harris site, Elmswell.

Rebecca

I have no objection to this application as there appears to be little conflict between the development and any significant trees/hedges on site. The arboricultural report provides an accurate assessment of the condition and constraints presented by the trees and appropriate measures for their protection. Although a small number of trees are proposed for removal these are of limited amenity value and/or poor condition and all important trees are scheduled for retention.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

Rebecca Biggs

From: Anne Westover
Sent: 11 May 2016 16:23
To: Rebecca Biggs
Cc: Simon Curl; Martin Egan; Sue Hooton; Philip Isbell
Subject: RE: 3918/15 - Former Grampian Harris Site, St Edmunds Drive, Elmswell - Reserved Matters for 190 Residential Dwellings

Dear Rebecca, further to our conversation, I have been through the plans submitted by JBA following our meeting last week and have also discussed these with JBA James Blake in more detail.

Broadly speaking whilst the site is very tight in terms of layout and space for landscape I am confident that TW will manage some planting as specified and indicated by the detailed extracts.

I would have expected more space on the site boundaries to help absorb the impact on the scheme into the wider landscape and I think the scheme will appear fairly suburban in terms of design in the village context and in wider views.

James and I discussed the need to take into account the **Naturally Wild report** submitted and approved under Condition 16 of the outline consent.

There are some aspects of this which need to be taken into account at **detailed planting design** stage such as: Inclusion of suitable tree and hedge species; lack of space will preclude the use of some listed such as blackthorn and other thorny suckering species.

James will endeavour to incorporate fruiting trees (item 4.3) into rear gardens as part of a planting strategy for those.

Hence my cc to Sue.

Replacement planting for trees which may be felled in rear of plots 10 – 14 will also be detailed. Nest boxes have been placed in some of these trees already I believe.

We have discussed the **need for fences** to be hedgehog friendly especially where the habitat areas continue beyond the site.

North boundary: the path now appears to be at 1.5 m wide. Measures will be undertaken to incorporate and small tree/hedge plants that still grow on this boundary.

I think there will be gaps in the hedge where the garages and parking area to Plots 145 – 148 are up against the boundary.

West boundary: I have suggested that all trees are kept away from parking bays and planted where there is verge space.

Trees next railway line: These will need to be carefully plotted on detailed landscape plans, (not shown at present) and new planting underneath of yew and holly to be used along the edge of the space to give a barrier to railway line.

Rear gardens backing onto industrial estate: smaller trees are shown in these gardens and more detail will be provided to ensure attractive fences/trellis with climbers to ensure that the outlook is softened as much as possible in the confined space available.

The various open green areas and central space: a more positive attempt at accommodating bigger trees within the spaces has been made and can be subject to final detail.

Street trees: some have been removed from the plan as it is clear that street lighting could be compromised. James and I agreed that all details will need to be finalised including what/where the services are laid to tie in with the tree pits.

I hope this helps, let me know if you have any queries.

Best wishes

Anne

Anne Westover
Landscape Architect
Landscape Planning Officer P/T
Natural Environment Team
Resource Management
Suffolk County Council
Tel 01473 264766
Mob 07586 266553



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From: Nathan Pittam
Sent: 13 January 2016 13:16
To: Planning Admin
Subject: 3918/15/RES. EH - Land Contamination.

M3 : 173740

3918/15/RES. EH - Land Contamination.

Land, St Edmunds Drive, Elmswell, BURY ST EDMUNDS, Suffolk.

Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Erection of 190 dwellings.

Many thanks for your request for comments in relation to the reserved matters at the above development. I do not believe that the reserved matters include land contamination issues so I have no comments to make in relation to the application.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715 or 01473 826637
w: www.babergh.gov.uk www.midsuffolk.gov.uk

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From: David Harrold
Sent: 24 March 2016 13:27
To: Planning Admin
Cc: Rebecca Biggs
Subject: Plan Ref 3918/15/AMENDED PLANS Former Grampian Harris Site, St Edmunds Drive, Elmswell

Thank you for consulting me on the revised plans and approval of reserved matters.

In respect of 'other' environmental health issues and plans submitted for the Character Area Detail in respect of the Community green, Core Housing CA5 and Countryside Edge I can confirm that I do not have any adverse comments.

I also take this opportunity to reiterate that In respect of my previous email to you dated 23 December 2015 relating to condition 10 of the approval, I await further information in respect of noise mitigation measures.

I trust this advice is of assistance, if you have any further queries, please do not hesitate to contact me.

David Harrold MCIEH

Senior Environmental Health Officer
Babergh and Mid Suffolk Council

01449 724718

Rebecca Biggs

From: David Harrold
Sent: 22 March 2016 11:36
To: AlexYoung@cassella.co.uk
Cc: Rebecca Biggs
Subject: FW: Former Grampian Food Site, Elmswell - Noise
Attachments: 20819 - Planning Layout (A) - 16.03.16.pdf

Hi Alex,

I can confirm I am happy in principle with the strategy of mitigation at source and submitting a noise report to discharge condition 10 on this basis.

I have copied in Rebecca Biggs (Planning Officer) dealing with this, for her agreement in case there are any difficulties from a planners point of view.

David Harrold

From: Alex Young [<mailto:AlexYoung@cassallen.co.uk>]
Sent: 18 March 2016 16:45
To: David Harrold
Cc: Stephen Lee - TW East Anglia; Chris McNeillie
Subject: Former Grampian Food Site, Elmswell - Noise

Hi David,

To summarise our conversation:

- In respect to noise generated by plant associated with M&J Seafood impacting on the site, the intention is to mitigate at source i.e. install noise enclosures or similar around the plant on the M&J Seafood site.
- The intention is to submit our noise report on this basis to discharge Condition 10 (specifying the level of noise attenuation required) on the basis that all mitigation measures will be installed prior to the occupation of the dwellings.
- This will allow our client to commence construction on a limited number of plots (e.g. plots 1 to 20, see attached plan) whilst the noise mitigation measures are being organised and installed.

Could you please confirm that you are in principle, happy with this approach? Also, if possible could you please confirm you have no objections to the relevant planning officer (apologies, I do not have their name to hand).

Kind Regards,

Alex Young BA(hons) DipIOA AMIOA
Acoustics Consultant

Cass Allen Associates
Bedford i-lab
Priory Business Park
Bedford MK44 3RZ

Direct dial: 01234 834871
Mobile: 07947 478633
Email: alexyoung@cassallen.co.uk
Web: www.cassallen.co.uk

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Rebecca Biggs

From: David Harrold
Sent: 13 April 2016 16:47
To: Rebecca Biggs
Cc: Stephen Lee - TW East Anglia; AlexYoung@cassella.co.uk; James Buckingham
Subject: RE: Former Grampian Food Site, Elmswell - Noise

Hi Rebecca,

There may be other alternative methods 'on site' that would be capable of mitigating adverse noise from MJ Seafood such as a very tall noise barrier at the site boundary. It would be for the applicant to determine if this was the way forward and submit an acoustic report. The height of the barrier may not be acceptable in planning terms or the best way of mitigating the noise in combination with other measures such as site design and acoustic treatment of building facades.

I have supported the alternative enclosure approach, proposed by Alex Young, because isolation of noise at source is the most effective means of mitigation and control.

I understand in this case it can cause issues in planning terms hence my email dated 22 March copied to you.

Alex has suggested that the applicant is restricted to building plots 1 to 20 and these plots are not occupied until the enclosure is in place. Again I supported this approach subject to your agreement.

If the enclosure is removed at a later date or deteriorates, and this causes adverse noise impacts, it would fall to the Council to investigate any noise complaints from residents. The Council does have powers under nuisance legislation to remedy such a situation. This would offer some degree of protection but not necessarily to the same high standard of noise mitigation as this procedure is different. By way of example, the company if served with a noise abatement notice would only be required to carry out work to abate a nuisance using best practicable means. I would anticipate this would equate to replacing the noise enclosures but cannot guarantee this as it would ultimately be a matter for the judiciary to decide if it went that far.

Previously in memos dated 3 May 2013 at outline stage and 23 December 2015 I have asked for the noise condition to be discharged before detailed plans can be approved.

It is difficult for me to advise any further, please contact me if you need to talk further about a solution and I will copy my manager in for any input (or ideas) he may want to make.

David

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Your Ref: MS/3918/15
Our Ref: 570\CON\0990\16
Date: 12th April 2016
Highways Enquiries to: martin.egan@suffolk.gov.uk

All planning enquiries should be sent to the Local Planning Authority.

Email:

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

For the Attention of: Rebecca Biggs

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/3918/15**

PROPOSAL: Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout & Scale for the development which includes the erection of 190 residential dwellings.

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

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

DRAWING NUMBER 20819/PL/01/A, PLANNING LAYOUT.

In highway terms the submitted planning layout is acceptable.

There are concerns in relation to the large number of street trees which are proposed within highway verges next to roads and footways. The space available is very restricted and it is unlikely that the trees could be accommodated as proposed. They will no doubt conflict with services and street lighting columns and many trees will not be able to be planted as proposed. If a certain style of landscaping is required then the trees should be located within private gardens; the proposed highway areas should not be relied upon to achieve landscaping.

The applicant will also need to submit a Travel Plan in order to comply with the relevant conditions.

Yours faithfully

Mr Martin Egan
Highways Development Management Engineer
Strategic Development – Resource Management

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3918/15

Jane Cole

From: Steve Kerr
Sent: 06 April 2016 10:58
To: Planning Admin
Cc: Francesca Clarke; Sharon Berry (MSDC); Andrew Woodin; Andrew Pearce; Emma Bethell; Neil McManus; Jackie Gillis
Subject: Application for reserved matters pursuant to planning permission 0846/13. Former Gramplan Harris site, Elmswell IP30 9HF

FAO: Rebecca Briggs

Dear Sirs,

Thank you for your letter dated 23/3/16 (ref 3918/15), regarding the above.

Further to previous correspondence in respect of the outline planning application and subsequent discussions with the developer, I can advise that the proposed footpath diversions plan (Ref 20819/PFD/01, dated 08.03/16) does not accurately reflect what was agreed between the developer and the county council, in its capacity as the highway authority. At each of the four locations where the proposed footpath diversion crosses the estate roads, it was agreed dropped kerbs and tactile paving would be provided – these do not appear to be indicated on the plan.

Any diversion order will need to be made under the provisions of s257 TCPA 1990 and administered by Mid Suffolk District Council/Babergh (MSDC), in its capacity as the local planning authority.

Although the Planning Statement dated October 2015 confirms the Hawk End level crossing footpath mitigation scheme is to be delivered by way of a s106 agreement pertaining to the outline permission, there has been no further detail on how the scheme will be implemented and Planning Condition 17 discharged, following MSDC's rejection of the previous risk mitigation proposal last year. I would be grateful for an update on this please.

I look forward to hearing from you.

Yours sincerely

Stephen Kerr
Definitive Map Manager
Rights of Way and Access
Resource Management
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Tel: 01473 264745
Email : steve.kerr@suffolk.gov.uk

MID SUFFOLK DISTRICT COUNCIL PLANNING CONTROL RECEIVED	
- 6 APR 2016	
ACKNOWLEDGED.....	JSC
DATE.....	7/4/16
PASS TO.....	RB

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From: Abby Antrobus
Sent: 30 March 2016 11:23
To: Planning Admin
Subject: 3918_15 Grampian Harris, Elmswell

FAO Rebecca Biggs

Dear Rebecca,

Thank you for consulting on this application. There was an archaeological condition on the outline application, 0846/13, and archaeological evaluation was undertaken. On the basis of this, my colleague Jude Plouviez advised that there would be no need for further work and that the condition could be discharged on the basis of the evaluation results. I would therefore not advise that there needs to be a condition relating to archaeological work on the current application.

With best wishes,

Abby

Dr Abby Antrobus
Senior Archaeological Officer
Suffolk County Council Archaeological Service
6 The Churchyard, Bury St Edmunds, Suffolk, IP33 1RX
Tel: 01284 741231
Mob: 07785950022



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

Our ref: AE/2016/120030/01-L01
Your ref: 3918/15
Date: 01 February 2016

Dear Ms Biggs

APPLICATION FOR APPROVAL OF RESERVED MATTERS PURSUANT TO OUTLINE PLANNING PERMISSION 0846/13 RELATING TO APPEARANCE, LANDSCAPING, LAYOUT & SCALE FOR THE DEVELOPMENT WHICH INCLUDES THE ERECTION OF 190 RESIDENTIAL DWELLINGS

FORMER GRAMPIAN HARRIS, ST EDMUNDS DRIVE, ELMSWELL.

Thank you for consulting us on this application which we received on 8 January 2016.

We submitted a holding objection as insufficient land contamination information was submitted at the outline application stage. We do not appear to have been consulted subsequently and our objection was not withdrawn and we did not have an opportunity to recommend conditions.

The reserved matters application does not appear to address land contamination issues.

Since the time of the outline application we have seen an increased volume of work leading to reprioritisation of our workload. We no longer consider this proposal to be of high priority. Therefore we will not be providing detailed site-specific advice or comments regarding land contamination for this site at this time.

The developer should continue to address risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework and our [Guiding Principles for Land Contamination](#).

Please refer to our standing advice included in Appendix 1.

Piled foundations

It is understood that piled foundations are proposed for the development. Piling or other penetrative ground improvement methods can increase the risk to the water environment by introducing preferential pathways for the movement of contamination into the underlying aquifer and/or impacting surface water quality.

For development involving piling or other penetrative ground improvement methods on a site potentially affected by contamination or where groundwater is present at a shallow depth, a suitable Foundation Works Risk Assessment based on the results of the site investigation and any remediation should be undertaken. This assessment should underpin the choice of founding technique and any mitigation measures employed, to ensure the process does not cause, or create preferential pathways for, the movement of contamination into the underlying aquifer, or impacting surface water quality. Please refer to our "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination" National Groundwater & Contaminated Land Centre Project NC/99/73 for further information.

Environment Agency Position

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

Condition

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

Reason

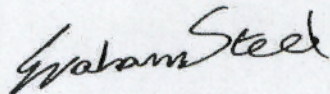
To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 109, 120, 121 and Environment Agency Groundwater Protection: Principles and Practice (GP3).

Advice to LPA / Applicant

Piling or any other foundation designs using penetrative methods can result in risks to controlled waters. It should be demonstrated that any proposed piling will not result in contamination of groundwater.

We ask to be consulted on the details submitted for approval to your Authority to discharge this condition and on any subsequent amendments or alterations.

Yours faithfully



Mr GRAHAM STEEL
Sustainable Places - Planning Advisor

Direct dial 02 03 02 58389

Direct fax

Direct e-mail planning.ipswich@environment-agency.gov.uk

cc Taylor Wimpey East Anglia

APPENDIX

We consider any infiltration Sustainable Drainage System (SuDS) greater than 2.0 m below ground level to be a deep system and are generally not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.

Soakaways must not be constructed in contaminated ground where they could re-mobilise any pre-existing contamination and result in pollution of groundwater. Soakaways and other infiltration SuDS need to meet the criteria in our Groundwater Protection: Principles and Practice (GP3) position statements G1 and G9 to G13.

Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components.

We recommend that developers should:

- 1) Refer to our "Groundwater Protection: Principles and Practice (GP3)" document:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297347/LIT_7660_9a3742.pdf
- 2) Follow the risk management framework provided in CLR11, "Model Procedures for the Management of Land Contamination", when dealing with land affected by contamination:
<https://www.gov.uk/government/publications/managing-land-contamination>
- 3) Refer to our "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):
<https://www.gov.uk/government/publications/managing-and-reducing-land-contamination>
- 4) Refer to our "Verification of Remediation of Land Contamination" report:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297674/scho0210brxf-e-e.pdf
- 5) Refer to the CL:AIRE "Definition of Waste: Development Industry Code of Practice" (version 2) and our related 'Position Statement on the Definition of Waste: Development Industry Code of Practice':
http://www.claire.co.uk/index.php?option=com_content&view=article&id=210&Itemid=82 and <https://www.gov.uk/turn-your-waste-into-a-new-non-waste-product-or-material>
- 6) Refer to British Standards BS 5930:1999-2010 and BS10175 and our "Technical Aspects of Site Investigations" Technical Report P5-065/TR
<https://www.gov.uk/government/publications/technical-aspects-of-site-investigation-in-relation-to-land-contamination>

- 7) Refer to our "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination" National Groundwater & Contaminated Land Centre Project NC/99/73 (available at <http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/scho0501bitt-e-e.pdf>);
- 8) Refer to our "Good Practice for Decommissioning Boreholes and Wells" (<http://stuartgroup.ltd.uk/downloads/wellservices/groundwater/boreholedecommissioning/EAGuidelines.pdf>);
- 9) Refer to our website <https://www.gov.uk/government/organisations/environment-agency> for more information.

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From: Planning Liaison [mailto:planningliaison@anglianwater.co.uk]
Sent: 15 January 2016 09:15
To: Planning Admin
Subject: RE: Consultation on Planning Application 3918/15

Dear Sirs,

Anglian Water would have no comments to make on this application.

Carl Lee

Growth Planning Advisor

Anglian Water Services Limited

Tel Office: 01733 414690

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT

www.anglianwater.co.uk

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From: RM Floods Planning
Sent: 09 February 2016 16:12
To: Planning Admin
Subject: RE: Consultation on Planning Application 3918/15

FAO Rebecca Biggs

Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout & Scale for the development which includes the erection of 190 residential dwellings. Former Grampian Harris site, St Edmunds Drive, Elmswell IP30 9HF

Please see SCC comments on the above application regarding dispose of surface water and all other surface water drainage implications.

SCC did not formally respond on the original outline application regarding the outline drainage and SuDS design, as that application was submitted before April 2015. SCC assume that this application has been submitted to address condition 1 of the decision notice for 0846/13, however we would like to take this opportunity to make comments in general regarding this application.

The site is located in the headwaters for an ordinary watercourse that ultimately drains into the River Blackbourn. The River Blackbourn is a listed river under the Water Framework Directive and has a protection status under EU legislation for water quality. Furthermore the Blackbourn also regularly floods during winter months affecting local highways including the A1088.

Having reviewed the FRA submitted at outline by BWB Consulting (ref: BMW/2061/FRA) SCC would advise the LPA that the proposed surface water drainage system does not comply with our local SuDS standard and national best practice such as BS 8582:2013 "Code of practice for surface water management for development sites" and Ciria SuDS Manual C753. Because there are known flood issues downstream (e.g. River Blackbourn) any development proposing to discharge runoff to a watercourse must have appropriate mitigation measures in place that comply with best practice and the NPPF to reduce the impact.

Specific Comments – areas of concern

1. Firstly in respect to this application for appearance and layout, SCC cannot see any SuDS features on the illustrative masterplan. The applicant needs to be clear where they are providing open space for SuDS and to make sure they are scaled correctly within the curtilage of the site. SCC will need to see a illustrative masterplan that incorporates the drainage strategy including the green spaces for SuDS and the SuDS features themselves. Indicative flow paths would also be useful.

Currently the drainage system for Phase 1 consists of swale system linked to a detention basin outside this boundary. We would advise that further source control measures are also looked at to provide a management train. The space required for the open swale in Phase 1 will not only depend on catchment area being drained but also to some extent on adoption and maintenance proposals which may affect allowable depths of open water within swales. Shallower depths will mean bigger basins.

2. The wider drainage system i.e. detention basin must be designed for the full site (Phases 1 and 2) and sized to the 1 in 100yr+CC event for the two phases.

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Swales should also ideally be sized to contain the 1 in100+CC storm event. Check dams will be required were the longitudinal slope of swales is steep, this is to allow for settlement of pollutants/silts. They will also to be designed with 1:4 side slopes and a maximum depth of water of 600mm as per national best practice. Therefore adequate space will be required to fit these in at this size and this why we are concerned they are not shown on the masterplan.

3. Because the site is previously developed, the proposed runoff rates should be restricted as close to the greenfield rates, or at the very minimum a betterment of at least 30% should be considered over the Brownfield runoff rates – as per section 3.2.2 in Ciria SuDS Manual C753. Currently the proposed discharge rate is Q_{bar} for all storm events upto the 100yr+CC event, this is given as 218 l/s. SCC consider this is to be too high and should be reduced accordingly to meet national best practice. With attenuation storage and swale sizes revised accordingly as well.

SCC require further calculations to outline what the theoretical greenfield rates are for this site in the 1, Q_{bar} , 30 and 100yr storms. This is for the existing area of the site.

We are assuming that the Rational Method has been used to calculate the existing brownfield runoff rates, however we would like further clarification as to the rainfall intensities used and where they are referenced from.

SCC would like to be consulted when information for condition 7 has been formally submitted.

Kind Regards

Steven Halls

Flood and Water Engineer
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Resource Management
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From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 08 January 2016 14:20
To: RM Floods Planning
Subject: Consultation on Planning Application 3918/15

Correspondence from MSDC Planning Services.

Location: Former Grampian Harris site, St Edmunds Drive, Elmswell IP30 9HF

Proposal: Application for approval of reserved matters pursuant to outline planning permission 0846/13 relating to Appearance, Landscaping, Layout & Scale for the development which includes the erection of 190 residential dwellings

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us within 21 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are HB1, C0299, H17, NPPF, GP1, CL8, RT12, Cor1, Cor2, Cor3, Cor4, Cor5, Cor6, Cor7, Cor8, Cor9, Cor11, HB14, H7, H14, H15, H13, E4, E6, E7, T2, T4, T9, H3, T10, T11, T12, T13, CSFR-FC1, CSFR-FC1.1, CSFR-FC2, CSFR-FC3, RT1, RT4, RT5, RT6, RT11, SC4, C0505, C1195, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Rebecca Biggs

From: Steven Halls
Sent: 15 April 2016 15:03
To: Rebecca Biggs
Subject: RE: Development at Station Road, Elmswell - Planning Application 3918/15

Follow Up Flag: Follow up
Flag Status: Flagged

Sorry Rebecca

Yes I can confirm that the below dialogue is correct and that the consultant will be doing some further work for us. I would suggest using a condition though, if possible, to allow for this to commence.

Regards

Steven Halls

Flood and Water Engineer
Flood and Water Management
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Tel: 01473 264430
Mobile: 07713093642
Email: steven.halls@suffolk.gov.uk

From: Rebecca Biggs
Sent: 15 April 2016 14:27
To: Steven Halls
Subject: FW: Development at Station Road, Elmswell - Planning Application 3918/15

Dear Steven,

I am under pressure to resolve this application. I would be grateful if you could respond to the below email. I am concerned any detailed drainage plan may conflict with the proposed landscaping.

Many thanks

Rebecca Biggs
Development Management Planning Officer
Babergh and Mid-Suffolk District Councils- WorkingTogether
www.babergh.gov.uk www.midsuffolk.gov.uk

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Please be advised that any comments expressed in this email are offered at an officer level as a professional opinion and are given without prejudice to any decision or action the Council may take in the future. Please check with the emails author if you are in any doubt about the status of the advice given.

*** CIL charging is coming to Mid Suffolk and Babergh soon. See our websites for the latest information [here](#) ***

From: Mark Chapman - TW East Anglia [<mailto:Mark.Chapman@taylorwimpey.com>]
Sent: 07 April 2016 17:42
To: Rebecca Biggs; Steven Halls
Cc: Philip Isbell; Stephen Lee - TW East Anglia
Subject: FW: Development at Station Road, Elmswell - Planning Application 3918/15

Good afternoon Rebecca,

Please see below the correspondence between our Engineer, James Vine & Steven Halls. I have just spoken to Steven and he is now happy that the Reserved Matters application is acceptable.

As you can see from Steven's email below, we are going to continue to work with him on the detailed drainage design to reduce the outflows as much as practicable and this is secured through Condition 7 of the Outline Planning Permission.

Steven – as discussed, please can you confirm that this is a fair and true reflection of our conversation.

Regards,

Mark

Mark Chapman | Design & Planning Manager | Taylor Wimpey East Anglia
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From: Steven Halls [<mailto:Steven.Halls@suffolk.gov.uk>]
Sent: 07 April 2016 14:40
To: James Vine - TW East Anglia
Subject: RE: Development at Station Road, Elmswell - Planning Application 3918/15

Hi James

The information that's been sent through has been really helpful and does confirm what I originally thought. I would still like to know where BWB got there position of the 30min storm duration from though – I'm not disputing it I'm just curious to know if it is written in any guidance.

Anyway because of the constraints with land availability and the fact that the permitted discharge rate has already been approved, I would like to recommend to the LPA that you guys can do some further work to improve the final flows during reserved matters/detailed design by whichever way possible. Thus improving on the 65, 168, 214 l/s outflows. Specifically if you recall my first email, I asked to see what extra storage features you can include on the site to bring down the actual discharge rate for all the storm events. I see you have cellular storage at manhole 35 and if this sort of component can be replicated around the site, you may be able to lower the outflow settings on the hydrobrake. Maybe even have small controls at the ends of each of the pipe branches with a storage area upstream of it?

I don't want to be too specific but aiming to get the 1yr down to say 50l/s, 30yr down to 100l/s and the 100yr+CC to 150 l/s would be an improvement and maybe wont causing any flooding out of the system?

Also would it be possible for us to have a copy of the microdrainage file (.mdx) for this site?

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Kind Regards

Steven Halls

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From: James Vine - TW East Anglia [<mailto:James.Vine@taylorwimpey.com>]
Sent: 07 April 2016 10:31
To: Steven Halls
Subject: FW: Development at Station Road, Elmswell - Planning Application 3918/15

Hi Steven,

I tried to call but no one seems to be picking the phone up. I just wondered if you have had the opportunity to consider my email below?

Kind Regards
James Vine

From: James Vine - TW East Anglia
Sent: 05 April 2016 17:21
To: 'Steven.Halls@suffolk.gov.uk'
Cc: Gary Lee - TW East Anglia; Stephen Lee - TW East Anglia; Mark Chapman - TW East Anglia
Subject: FW: Development at Station Road, Elmswell - Planning Application 3918/15

Hi Steven,

Many thanks for your response yesterday in relation to the development at Elmswell.

As requested in your email please find attached a response from BWB in relation to have they have established the relevant brown field run-off rates for the development which I trust is of assistance. I have also included a set of preliminary calculations for the proposed onsite designs. As you will see the discharge rates for the 1yr event is 65.0l/s, 30yr event 168.7l/s and the 100yr event + Climate change 214 l/s. As previously advised this is in line with the approved FRA as part of the outline planning permission for the development. BWB also detail this as being a betterment of 20% from the actual brownfield discharge rates. Based upon the FRA QBAR is 218l/s which is what we are limiting the worst case storm to. The actual discharge rates for the 30yr storm is 528l/s and the 100yr being 788l/s. We are therefore providing a large improvement in run-off rates for the worst case storms.

As you may be aware we purchased the parcel of land from Harrow Estates and as part of the land sale we are only allocated a certain area to position the pond. As you will appreciate this area was set based upon the FRA. This means that we are unable to extend the pond in width due to these limitations with the land take. The land in which the pond is going to be positioned is land outside of our ownership and is not land we control.

We obviously want to work with you to overcome these problems and there may be the possibility to introduce a more complex flow control device which could reduce down the flows for the smaller storm events but we would of course still need to increase flow rates for the 100yr storm events to avoid the pond from flooding. This may therefore generate a greater flow rate in a worst case event. The final detailed design may also be able to reduce the flow rates slightly but I don't expect this to be much of a reduction.

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We have done a quick run of the calculations based upon limiting flows down to 52l/s as detailed but this generated a large flood and would mean increasing the pond by quite a significant amount which we don't have the land availability for.

I would be grateful for your earliest response to this on the basis that we need to submit our application imminently.

Kind Regards
James Vine

From: Gary Lee - TW East Anglia
Sent: 04 April 2016 17:01
To: James Vine - TW East Anglia
Subject: FW: Development at Station Road, Elmswell - Planning Application 3918/15

James,

Could you look at this first thing and answer any concerns Steven has please?

Thanks

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From: Steven Halls [<mailto:Steven.Halls@suffolk.gov.uk>]
Sent: 04 April 2016 16:40
To: Gary Lee - TW East Anglia
Cc: Rebecca Biggs
Subject: RE: Development at Station Road, Elmswell - Planning Application 3918/15

Gary

I'm terribly sorry I haven't got back to you sooner, things are manic here atm. I have read your comments and have the following proposals:-

Basically I'm still very concerned about the final discharge rate of 218l/s – I acknowledge that this rate was accepted at outline but I'm surprised the EA approved it given that there are known flood incidents recorded just downstream of the site and from their main river (R. Blackbourn). The Non-technical Standards for SuDS outline that for previously developed sites, SW should be limited to, where reasonably practical to greenfield rates. We work to this on all brownfield sites. It's confusing that this wasn't asked for at outline and annoying there is no evidence in the FRA its even been looked into.

I'm also concerned that no reference is mentioned in the FRA to which method BWB used to work out the original peak runoff rates. I assume they used the modified rational method but to which rainfall parameters – FSR/REFH or gauged data. This equation is used for the design of pipe networks and when used for this purpose relies heavily on representing the existing drainage layout of the brownfield site. I haven't seen any maps or plans of the existing drainage network of the site, their capacity, layout or the position of the outfall. With no information of this sort available, im worried that these numbers are based on guesses which is not good enough. I'm especially interested to know why they used a 30min storm duration?

I refer to section 24.5 of the new SuDS manual which highlights that volume and peak runoff rates should be calculated for previously developed sites using accurately represented simulations of the existing pipe network. Currently I have seen no evidence of this and furthermore no assessment has been undertaken on volumes at all.

In light of the above, I don't want to be too unreasonable and I understand that you guys have just picked this up from BWB, thus I'm willing to work with you guys on this to come to some sort of compromise. Basically I need to know how much extra storage can be implemented at the site and what improvements can be made to the discharge rate without causing too many alterations to the building layout. I think a good place to start is to firstly see what your simulations are showing for the proposed site (3.575ha of imp area) and see what the resultant peak flows are for the 1, Qbar, 30 and 100yr +CC storms with and without attenuation. I will be interested to see if they are close to the 218l/s.

Secondly, you mention that the proposed basin could be deepened. It needs to be widened rather than deepened unless the watercourse level is lower than the lowest invert in the pond. But implementing more source control features is a must. This is the biggest downfall on the site, there is no site wide management train to capture stormwater at source – you could use skeletanks, storage underneath permeable paving or even oversized pipes. There are many options, all of which would help to reduce the outflow from the site. Ideally I would like to see more soft options like detention basins in POS but given your latest layout I doubt this is possible.

To put some perspective on this I have calculated a discharge rate based on method 2 in section 24.5 of the Suds manual – so in MicroDrainage using ICPSUDS you can increase SOIL to 0.5 and use a Partly Urbanised Catchment factor (set it to 0.75) to represent a brownfield site. Using this method, bearing in mind it's completely different to the rational method, it gave me 52l/s for Qbar. Whether this is more representative or not is debatable but it is an improvement on 218 l/s.

In summary if you could find: -

- BWBs notes and evidence on how they came up with the 218l/s – what method they used and the numbers inputted and why 30min duration was selected
- What raw peak flows the proposed site will produce using the latest simulations.
- Areas where further storage could be implemented so that the discharge rate can be reduced to help flood risk downstream.

Please let me know your thoughts

Kind Regards

Steven Halls

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From: Gary Lee - TW East Anglia
Sent: 12 February 2016 07:53
To: 'steven.halls@suffolk.gov.uk'
Cc: Lee, Stephen - TW East Anglia (stephen.lee@taylorwimpey.com); Vine, James - TW East Anglia (james.vine@taylorwimpey.com)
Subject: Development at Station Road, Elmswell - Planning Application 3918/15

Good morning Steven,

I have been passed a copy of your comments regarding the above application, in relation to the items raised I can comment as follows:-

1. During the investigations for this development, it was identified that infiltration techniques would not be of use with results ranging between 2.16×10^{-6} and 4.77×10^{-7} and therefore a positive discharge point would be required. We also had water strikes as shallow depths. **Noted** The FRA undertaken by BWB was an document submitted as part of the Outline Planning Permission 0846/13 and proposed the use of an attenuation pond within land to the north-west of the site, together with two linear swales along the northern and western boundaries. Upon further detailed design whilst undertaking the planning layout, it became clear that the two boundary swales would be of limited use as the topography didn't allow for conveyance to these swales. However, we have introduced within the layout for highway verges to run parallel to the main spine road, within these verges at detailed design stage, we will look to utilise shallow swales and/or vegetated filter strips in order to take storm run-off from the highways instead of the conventional road gully. The swales/filter strips will then drain back into the conventional sewer system which will ultimately drain into the attenuation basin as infiltration cannot be fully relied upon **noted**. Where roads don't have highway verges, we are proposing to introduce a further filter strip on or before it enters into the attenuation pond. The swales will not act as storage facilities due to the width of the verge proposed.
2. At this stage, there is no planning permission for Phase 2. We also do not control the land should a Phase 2 come forward. Therefore at this stage we cannot size the detention basin for the additional area. As mentioned above, the swales will not be sized to accommodate any storage and therefore the attenuation pond and sewers beneath the roads will be sized to accommodate all the flows for the 1in100 year event plus climate change. The road side swales will likely only be 200mm deep. As the OPP is for 190 residential units (secured before we purchased the site), there is insufficient space to accommodate deep carrier swales/ditches to convey the water to the attenuation basin where topography would allow. Flood exceedance paths will also be designed in to convey water to the attenuation basin where possible, if not to public open space areas.
3. The discharge rate of 218 litres/second as proposed within the BWB report already includes a betterment of 20% over the brownfield rates. We would propose the use of a complex control at the outfall of the attenuation basin in order to utilise a reduced discharge rate for all storms upto and including the 1in30 year storm event, thus holding back volume as much as possible and utilising the storage in the attenuation pond more regularly. A second flow control will be placed at the 1in30 year water level but combined discharge rates would not exceed 218 litres/second. It may be possible to make a further betterment to this rate if the attenuation pond was deepened. The proposed drained area will be less than the former Brownfield drained area therefore I'm not sure why the Greenfield Rates would be applied here.

I also attach an email of the record of conversation I had in a meeting with Jeff Horner whilst we were designing up the layout. He was happy with the approach we had taken once I had explained the poor infiltration rates, topography, conveyance and maintenance issues etc.

Should you feel a meeting would be beneficial to discuss further, please let me know some convenient times that would suit you.

Kind regards

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