

# Comments for Planning Application DC/21/06379

## Application Summary

Application Number: DC/21/06379

Address: Land East Of Ashfield Road Elmswell Suffolk

Proposal: Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

Case Officer: Mahsa Kavyani

## Customer Details

Name: Mr Peter Dow

Address: Blackbourne Community Centre, Blackbourne Road, Elmswell, Suffolk IP30 9UH

## Comment Details

Commenter Type: Parish Clerk

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:DC/21/06379 19 dwellings on land east of Ashfield road

Elmswell Parish Council objects to this application for the following reasons:

The site is in the countryside outside of the Settlement Boundary within which new development will properly take place.

With regard to the strong policy imperatives aimed at protecting the existing character and appearance of the countryside, this proposal offers no justification for exceptional treatment and does not present a case for special consideration under categories identified and defined in the Local Plan, the Core Strategy or the National Planning Policy Framework.

Councillors make this statement with reference to the following factors:

1 MSDC has achieved a Housing Land Supply of more than 5 years. The Draft 5YHLS position statement November 2021 indicates that there is a 9.5 year housing land supply, almost double what government requires. In line with NPPF objectives in paras 78 and 83, Planning permission has been granted for substantial housing growth within or adjoining the Elmswell settlement boundary, and delivery of these developments is well advanced. On this basis, there should be no overriding presumption in favour of development that does not meet local policies. While some previously adopted policies are "out of date" and to be replaced in the new draft Local Plan, many are still aligned with objectives of the NPPF.

2 Most relevant here are FC1 and FC1.1 regarding Sustainable Development, CS5 relating to natural landscape and Mid Suffolk's environment, which aligns with NPPF 127 and 170. The conflicts with these policies and guidance are material considerations. The proposal is an

extension into the countryside, with no exceptional justification, and is harmful to the open rural character and landscape of the area.

3 This proposal does not constitute sustainable development using the NPPF overarching economic, social and environmental objectives. The economic benefit of construction employment is short term, and the contribution to the local economy from occupiers would be very modest. The social benefit is questionable, given the distance and difficulty in reaching village facilities and activities on foot. There would be no environmental benefit, rather the incursion of buildings into the countryside would diminish the natural landscape, habitat and biodiversity.

4 This is not an 'exception' site providing affordable housing, and would not make any significant contribution to the vitality of the village.

5 Considering these points, together with the NPPF as a whole and policies FC1 and FC1.1, the proposal cannot be judged to be a sustainable development.

6 There is no pavement on Grove Lane or part of Ashfield Road and footpaths across the fields to the village are only recreational, not level, unlit, and virtually unusable in/after bad weather. The lack of close, convenient and safe access to facilities by walking or cycling means greater reliance on car journeys. Grove Lane is not wide enough to safely accommodate passing vehicles and pedestrians and cyclists. The lane is heavily used by a variety of commercial traffic, much of which gives little consideration to the residents. There is considerable use by extremely large vehicles, which are unable pass each other without driving on to the verge. Grove Lane cannot be regarded as inherently safe for children, the elderly or those with animals. It cannot be considered a sustainable location for additional dwellings

7 The site is an uncultivated grassed field surrounded by hedges, making a high-profile positive contributions to the appearance of the local landscape and potential for biodiversity and wildlife habitat. The proposal seeks to disrupt the existing pattern of development and the village's transition into open countryside. Regardless of design, any type of built form would harm the open countryside, with no appreciable public or local benefit to outweigh that harm. This is contrary to policies GP1, FC1.1, CS5 and CL8, which require developments to conserve and enhance the local character and respect the local distinctiveness of Mid Suffolk, including its natural landscape and protection of biodiversity. As these policies are broadly aligned with objectives in paragraphs 127 and 170 of the NPPF, this conflict must be given significant weight.

8 The proposal seeks to create an enclave whose residents would be dependent on car use to reach village facilities and amenities. In effect, it seeks to create a large satellite population with no sustainable means of connection to the village. The Transport Statement quotes NPPF paras 108-110 on highway objectives: "That it is safe for all users" and "That it promotes sustainable, high-quality alternatives to the private car and to achieve developments accessible to all vehicles and people". The proposal flies in the face of both of these strictures and goes further to suggest that the lack of a pavement from Grove Lane as far as Oak Lane is not a problem as pedestrians can use the grass verge as a walking route to and from the village. Local residents have long complained about the lack of a proper pavement on this part of Ashfield Road and have warned of near misses with the large volume of cars and HGVs that use it. The verge is uneven, muddy, subject to erosion by large vehicles and encroachment by hedges, dangerous to walk along in bad weather and in the dark, and impossible for anyone pushing a buggy, holding onto small children

or carrying shopping. It is completely impassable for anyone who has reduced mobility. There is no verge at all on the other side of the road, forcing pedestrians going towards Grove Lane from the village to walk with their backs to the traffic, contrary to Highway Code rules. This is especially dangerous if an obstruction forces pedestrians to step into the carriageway. This verge is neither safe nor high-quality, and to suggest that it constitutes a safe walking route to village amenities betrays a cynical disregard for pedestrian safety on the part of the applicant.

9 Suffolk County Council Highways Officers highlight exactly these concerns in their formal Objection which confirms that the proposal presents, in terms of NPPF paragraph 111, 'an unacceptable impact on highway safety.'

Peter Dow

Clerk to Elmswell Parish Council

21.12.2021



06 January 2022

Mahsa Kavyani  
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/21/06379  
**Location:** Land East Of Ashfield Road Elmswell Suffolk  
**Proposal:** Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses

Dear Mahsa,

Thank you for consulting Place Services on the above application.

**No objection subject to ecological mitigation measures and enhancement measures**

**Summary**

We have reviewed the Preliminary Ecological Appraisal (Aspen Ecology, May 2021), submitted by the applicant, relating to the likely impacts of development on designated Sites, protected and Priority Species & habitats.

We are satisfied that there is sufficient ecological information available for determination. This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority Species/Habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in Preliminary Ecological Appraisal (Aspen Ecology, May 2021) should be secured and implemented in full. This is necessary to conserve protected and Priority Species.

In addition, we support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174 [d] of the National Planning Policy Framework 2021. The reasonable biodiversity enhancement measures should be



outlined within a Biodiversity Enhancement Strategy and should be secured as a condition of any consent.

This will enable LPA to demonstrate its 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. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**  
*"All mitigation measures and/or works shall be carried out in accordance with the details contained in Preliminary Ecological Appraisal (Aspen Ecology, May 2021) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination."*

**Reason:** To conserve Protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) as updated by the Environmental Act 2021.

- 2. PRIOR TO SLAB LEVEL: 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 following the recommendations made within the Preliminary Ecological Appraisal (Aspen Ecology, May 2021)."*

*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 and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species) as updated by the Environmental Act 2021.



Please contact us with any queries.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**

Ecological Consultant

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@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.



## 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 07929 786955 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

AW Site Reference: 182952/1/0136356

Local Planning Authority: Mid Suffolk District

Site: Land East Of Ashfield Road Elmswell Suffolk

Proposal: Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

Planning application: DC/21/06379

**Prepared by:** Pre-Development Team

**Date:** 1 December 2021

### ASSETS

#### Section 1 - Assets Affected

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

### WASTEWATER SERVICES

#### Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Elmswell Water Recycling Centre which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

### Section 3 - Used Water Network

This response has been based on the following submitted documents: Design, Access Heritage and planning statement. The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. (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. The applicant has indicated on their application form that their method of surface water drainage is via SuDS. If the developer wishes Anglian Water to be the adopting body for all or part of the proposed SuDS scheme the Design and Construction Guidance must be followed. We would recommend the applicant contact us at the earliest opportunity to discuss their SuDS design via a Pre-Planning Strategic Enquiry. The Lead Local Flood Authority (LLFA) are a statutory consultee for all major development and should be consulted as early as possible to ensure the proposed drainage system meets with minimum operational standards and is beneficial for all concerned organisations and individuals. We promote the use of SuDS as a sustainable and natural way of controlling surface water run-off. We please find below our SuDS website link for further information.

<https://www.anglianwater.co.uk/developers/drainage-services/sustainable-drainage-systems/>



**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 09 Dec 2021 02:16:42

**To:**

**Cc:**

**Subject:** FW: 2021-12-09 JS Reply Land East Of, Ashfield Road, Elmswell Ref DC/21/06379

**Attachments:**

---

**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>

**Sent:** 09 December 2021 14:13

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Subject:** 2021-12-09 JS Reply Land East Of, Ashfield Road, Elmswell Ref DC/21/06379

Dear Mahsa Kavyani,

Subject: Land East Of, Ashfield Road, Elmswell, Suffolk Ref DC/21/06379

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06379

The following submitted documents have been reviewed and we recommend maintain a **holding objection** at this time:

- Site Location Plan Ref 4458-01
- Site Layout Plan Ref 4458-02d
- Flood Risk Assessment and Drainage Strategy Ref 259/2020/FRADS P3

A holding objection is necessary because the site is predicted to be a risk of surface water flooding, this is contrary to national and local policy/guidance. There are issues/errors within the submitted Flood Risk Assessment and Drainage Strategy Ref 259/2020/FRADS P3.

1. *National Planning Policy Framework (2021) Paragraph 159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
2. *Mid Suffolk District Council's Core Strategy Policy CS 4 Sept 2008 Flood Risk: The council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.*
3. *The Suffolk Flood Risk Management Strategy 2016 Paragraph 2.5 - Planning authorities should only approve development where it can be demonstrated that the proposal satisfies all the following criteria:*
  - a. *it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and use of appropriate SuDs*
  - b. *it will be adequately protected from flooding;*
  - c. *it is and will remain safe for people for the lifetime of the development*

The applicant is also proposing to utilise a hybrid SuDS system without demonstrating why a full SuDS system cannot be utilised.

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

The points below detail the action required to overcome our current objection:-

1. Demonstrate that the proposed development meets the requirement of national and local policy/guidance in relation to flood risk.
  - a. Properties are proposed within a surface water blue corridor.

2. Update the submitted Flood Risk Assessment and Drainage Strategy Ref 259/2020/FRADS P3 as it references superseded national and local policy i.e., NPPF, SFRA.
3. Submit a surface water drainage strategy utilising above ground open SuDS for collection, conveyance, storage, and discharge, or demonstrate why this is not appropriate for this site.
4. Demonstrate that the applicant has the right or has acquired the right to discharge clean surface water to the watercourse in perpetuity
5. Demonstrate that the SuDS basin has a 1.5m width wet/dry bench every 0.6m depth of water, 300-500mm freeboard and a 3m maintenance strip around the top.
6. Maintenance plan/schedule needs to include maintenance of the watercourse if within the ownership of the development.
7. Provide a CDM designer risk assessment for all open SuDS features.

**Note further information may be required.**

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure  
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

**\*\*Note I am remote working for the time being\*\***

**From:** GHI Floods Planning

**Sent:** 10 February 2022 13:55

**Subject:** 2022-02-10 JS Reply Land East Of, Ashfield Road, Elmswell Ref DC/21/06379

Dear Mahsa Kavyani,

Subject: Land East Of, Ashfield Road, Elmswell Ref DC/21/06379

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06379

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Site Location Plan Ref 4458-01
- Site Layout Plan Ref 4458-02d
- Flood Risk Assessment and Drainage Strategy Ref 259/2020/FRADS P4

A holding objection is necessary because the site is predicted to be a risk of surface water flooding, this is contrary to national and local policy/guidance. There are omissions within the submitted Flood Risk Assessment and Drainage Strategy Ref 259/2020/FRADS P4.

*1. National Planning Policy Framework (2021) Paragraph 159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*

*2. Mid Suffolk District Council's Core Strategy Policy CS 4 Sept 2008 Flood Risk: The council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.*

*3. The Suffolk Flood Risk Management Strategy 2016 Paragraph 2.5 - Planning authorities should only approve development where it can be demonstrated that the proposal satisfies all the following criteria:*

- a. it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and use of appropriate SuDs*
- b. it will be adequately protected from flooding;*
- c. it is and will remain safe for people for the lifetime of the development*

The applicant is also proposing to utilise a hybrid SuDS system without demonstrating why a full SuDS system cannot be utilised.

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

The points below detail the action required to overcome our current objection:-

1. Demonstrate that the proposed development meets the requirement of national and local policy/guidance in relation to flood risk.
  - a. Properties are proposed within a surface water blue corridor, this is contrary to national and local policy.
2. Submit a surface water drainage strategy utilising above ground open SuDS for collection, conveyance, storage, and discharge, or demonstrate why this is not appropriate for this site.
  - a. This shall be as either a viability assessment or as constraints plan
3. Demonstrate that the SuDS basin has a 1.5m width wet/dry bench every 0.6m depth of water, 300-500mm freeboard and a **3m maintenance strip around the top**.
4. Provide a CDM designer risk assessment for all open SuDS features.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure

Your Ref: DC/21/06379  
Our Ref: SCC/CON/5378/21  
Date: 10 December 2021  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.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: Mahsa Kavyani - MSDC

Dear Mahsa

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/06379**

**PROPOSAL:** Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

**LOCATION:** Land East Of, Ashfield Road, Elmswell, Suffolk

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

**Objection until the following comments have been addressed:**

A development of this scale should provide safe and suitable access to local amenities, including the primary school and sustainable transport connections without the need for motor vehicle travel. The presence of a narrow, unmade path in the western side verge of Ashfield Road is noted, but this does not provide a suitable, year round walking route for any type of vulnerable road user.

NPPF 110 requires that 'safe and suitable access to the site can be achieved for all users' and NPPF 112 requires that developments should 'give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas' and 'address the needs of people with disabilities and reduced mobility in relation to all modes of transport'.

Ashfield Road is a highly trafficked, unlit C class road and subsequently, the need for pedestrians to walk in or enter the road to access local amenities would result in 'an unacceptable impact on highway safety' (NPPF 111).

Significant improvements to the existing route would be required to address the above comments.

It is also noted that the proposed visibility splays onto Ashfield Road are not clearly illustrated on the submitted drawings. This is necessary to enable the Highway Authority to assess whether they can be achieved within the highway verge and/or land controlled by the applicant.

**SCC Passenger Transport Comments:**

We don't have any services along Ashfield Road at present, and this development certainly isn't big enough to fund one, or tempt someone to run past commercially. Ordinarily at this point I would ask that they at least create a safe pedestrian route to the nearest stops, but I don't think even that will be possible due to the lack of footway.

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**  
Growth, Highways and Infrastructure

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 25 Nov 2021 02:45:48

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/06379

**Attachments:**

---

**From:** Chris Ward <Chris.Ward@suffolk.gov.uk>

**Sent:** 25 November 2021 12:05

**To:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06379

Dear Mahsa,

Thank you for consulting me about the proposed residential development at Land East of Ashfield Road in Elmswell. On reviewing the planning documents submitted I have no comment to make, as the development does not meet the threshold of requiring a Travel Plan in accordance with the Suffolk Travel Plan Guidance.

Kind regards

**Chris Ward**

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

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

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

Your Ref:  
Our Ref: FS/F311079  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 25/11/2021

Dear Sirs,

**LAND CORNER OF ASHFIELD ROAD/GROVE LANE, ELMSWELL, IP30 9HJ**  
**Planning Application No: DC/21/06379/FUL**

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), 2019 Edition, 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, 2019 Edition.

**Water Supplies**

No additional water supply for fire fighting purposes is required in respect of this planning application.

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).

/continued



OFFICIAL

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 or appoint Approved Inspector 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

Copy: [info@philcobboldplanning.co.uk](mailto:info@philcobboldplanning.co.uk)

Enc: Sprinkler Information

# Consultee Comments for Planning Application DC/21/06379

## Application Summary

Application Number: DC/21/06379

Address: Land East Of Ashfield Road Elmswell Suffolk

Proposal: Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

Case Officer: Mahsa Kavyani

## Consultee Details

Name: Mr Thomas Pinner

Address: BMSDC, Endeavour House, Ipswich IP1 2BX

Email: Not Available

On Behalf Of: Heritage Team

## Comments

Dear Mahsa,

DC/21/06379 Full Planning Application Erection of 19 dwellings.

21/12/2021

To the east of the proposal site, beyond the playing field, is Grove Farmhouse, a Grade II Listed C16 farmhouse. Although the proposal site is not directly adjacent to this listed building, and a sense of physical separation would be retained, I consider that the development may still cause some amount of harm. Firstly, I consider that the development may still be somewhat visually perceptible within the same context as Grove Farmhouse and, as it would be a fairly dense, suburban form of development, this would appear out of keeping with a historically rural farmhouse. Secondly, the development site may historically have formed part of the land used by the farmhouse for farming activities given the land appears to have formed part of the medieval Buttonhaugh Green, as shown on Hodskinsons Map of 1783, this would be in the form of use but not ownership prior to enclosure, with possible ownership as well after enclosure. Although they are now separated by non-agricultural land, if there was a historic connection then this would probably still be more apparent with the proposal site in its current form, as opposed to if it was developed for housing. Thirdly, as the land between Grove Farmhouse and Ashfield Road was likely historically part of Buttonhaugh Green, then this land adds to the evidence for the reason for positioning the listed building on the edge of the green, as was typical in the C16, thus adding to its story. I consider that development on the proposal site would make the reason why Grove Farmhouse was located here more difficult to appreciate.

Similarly, Buttonhaugh Green likely has historic interest in its own right, as a former medieval

common, and the proposal would result in further erosion of its historically undeveloped character, in cumulation with other recently approved developments.

However, it is noted that this part of the setting of Grove Farmhouse/part of Buttonhaugh Green has already been considerably developed and thus eroded, in the last 100+ years, and the proposal site is a relatively small gap within this development. Consequently, I consider that the level of harm would be limited due to this. Overall I would characterise the level of harm to Grove Farmhouse as a very low to low level of less than substantial harm, dependent to some extent upon their exact relationship historically. The impact on Buttonhaugh Green would be very low. I consider there would likely be limited opportunity for mitigation of this harm.

If the LPA are minded to approve this application, I would not request any conditions in this case.

Kind Regards,

Thomas Pinner BA(Hons), MA, MA  
Heritage and Design Officer  
Babergh and Mid Suffolk District Councils  
M 07850 883264  
T 01449 724819  
E [thomas.pinner@baberghmidsuffolk.gov.uk](mailto:thomas.pinner@baberghmidsuffolk.gov.uk)  
E [heritage@baberghmidsuffolk.gov.uk](mailto:heritage@baberghmidsuffolk.gov.uk)  
W [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

#### Advance Notice of Christmas Closure

Please be advised that the Development Management, Heritage and Planning Enforcement Team will be unavailable from midday on Friday 24th December returning on Tuesday 4th January 2022.

For our latest Coronavirus response please visit click the following link-  
<https://www.midsuffolk.gov.uk/features/our-covid-19-response/>

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

To: Mahsa Kavyani – Planning Officer

From: Robert Feakes – Housing Enabling Officer

Date: 15 December 2021

Subject: Full Planning Application

Proposal: DC/21/06379

Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

Location: Land East Of Ashfield Road Elmswell Suffolk

---

**1. Key Points**

<b>Holding Objection:</b> The affordable housing mix is not supported and it needs to be determined that the affordable homes meet the Nationally Described Space Standard.
---

<b>Comment:</b> The market housing mix provides a small number of smaller units, but no 1-beds
--

**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. The Council's Choice Based Lettings system currently has 37 applicants registered for affordable housing with a local connection to Elmswell as of December 2021, with more than 600 on the Housing Register with a connection to Mid Suffolk.

**3. Affordable Housing**

3.1 35% of the development equates to 6.65 units. The applicant is proposing the following affordable housing units. No proposals have been set out in respect of tenure. Furthermore, it is not clear whether the affordable housing units meet the Nationally Described Space Standard.

- 2 x 1b Flats
-

- 4 x 2b Houses

3.2 With regard to local housing needs as expressed on the Housing Register, the following mix would be preferable:

Tenure	Number of units	Bedrooms and Occupants	Minimum unit Size (GIA) (m2)
Affordable Rent (4 units total)	2	1b2p Flat <sup>1</sup>	50
	1	2b4p	79
	1	3b5p	93
Shared Ownership (2 units total) <sup>2</sup>	1	2b4p	79
	1	3b5p	93

3.3 It would be welcomed if the ground floor 1-bed flat could be fitted with a level access shower. Could this be made a requirement of the designs, by condition or obligation?

3.4 The residual 0.65 of a dwelling should be secured by way of a commuted sum of **£49,358**. A methodology for calculating this figure is set out in the appendix to this memo.<sup>i</sup>

3.5 The layout of the affordable housing is acceptable. Given the small number of affordable units, it would be challenging to pepper-pot them through the site.

3.6 Gross internal areas have not been provided; **it needs to be determined whether the affordable units meet the Nationally Described Space Standard, with units meeting the floorspace measurements set out in the table above.**

3.7 Whilst the development proposals may not represent entirely tenure-neutral design, the affordable units are visually similar to the open market units. It is noticeable that the affordable units do not have parking on plot, whereas the open market units do.

3.8 The affordable units need to be assessed to determine whether there is sufficient vehicle and cycle parking (in line with Suffolk Guidance on parking). It also needs to be determined that there is sufficient bin storage.

3.9 The highway access to the affordable dwellings needs to be built to an adoptable standard. This is to enable either adoption by the Highway Authority or to reduce long term maintenance costs for the eventual Registered Provider, which will either be passed on to tenants / leaseholders or be absorbed by the RP, reducing future investment in affordable housing.

<sup>1</sup> With own front door and no communal spaces, as per current design of units 4 and 5.

<sup>2</sup> With regard to paragraph 65 of the NPPF (July 2021).

### 3.10 Further points related to affordable housing include:

- Affordable Housing requirements need to be secured via a planning obligation (Section 106 agreement).
- The affordable homes must be promptly transferred to a suitable Registered Provider, approved by the District Council.
- Properties must be built to meet any current Homes England requirements.
- It would be welcomed if the units could meet part M4(2) of the Building Regulations. This would go some way towards compensating for the lack of bungalows from amongst the affordable housing mix.
- The Council is to be granted 100% nomination rights to all the affordable units on initial lets and 100% thereafter.
- 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
- The Council will not support applications for grant funding to deliver these affordable homes.

## 4. Open Market Mix

4.1 The key (extant) policy for considering this issue is Policy CS9 of the Mid Suffolk Core Strategy.

4.2 The Strategic Housing Market Assessment ('SHMA' 2019, part 2) indicates the market housing requirements for the district as a whole. This may not represent a directly and specifically appropriate mix in the circumstances and constraints of a development, but it offers a guide as to how the development can provide an appropriate mix (in the context of CS9) and contribute to meeting overall needs. The table below compares the development as proposed with the split set out in the SHMA.

Size of unit (bedrooms)	Current proposal	Split to mirror district-wide requirement <sup>ii</sup>	Difference
1	0	1	-1
2	2	4	-2
3	7	4	3
4+	4	4	-

4.3 The table above would suggest that a need for some of the units to be brought forward as 1- or 2-bed. It is noted that no units are proposed to be bungalows.

4.4 No commitment has been made to ensuring that all market (and affordable) units meet Part M4(2) of the Building Regulations, although this is not currently in planning policy. It is not known whether the open market units meet the floorspace requirements of the Nationally Described Space Standard.

---

## Appendix 1: Commuted Sum Calculation

The commuted sum calculation is as follows based on a 2-bed affordable dwelling as this is much needed within the district:

An NDSS compliant 2 bed 4-person house @ 79 sqm GIA at a design and build rate of £2,000/m<sup>2</sup> for an affordable unit gives the following total design and build cost:

$$79 \times £2,000 = £158,000$$

A suitable plot value based on the above property and taking the District Valuation Service Property market report into account at £600/sqm is £47,400.00

Design and Build Cost:	£158,000
Plot Value:	£47,400
Plus, Housing Association on costs at 7% of design and build	£11,060
Plus MSDC management fee of	£500.00
Less Housing Association acquisition price	£141,024

Commuted sum total = £75,936 per 2 bed house unit

The figure for 1 whole dwelling is £75,936 therefore in this case the sum required to be paid for 65% of one dwelling = **£49,358**

ii

## Appendix 2: Size of new owner-occupied accommodation required in Mid Suffolk over the next 18 years

Source: Ipswich Strategic Housing Market Assessment Part 2 Partial Update (January 2019)

Table 4.4e (using the 2014-based projections)

<b>Size of home</b>	<b>Current size profile</b>	<b>Size profile 2036</b>	<b>Change required</b>	<b>% of change required</b>
One bedroom	707	1,221	515	7.2%
Two bedrooms	5,908	8,380	2,472	34.4%
Three bedrooms	13,680	15,784	2,104	29.3%
Four or more bedrooms	12,208	14,303	2,096	29.2%
<b>Total</b>	<b>32,502</b>	<b>39,688</b>	<b>7,186</b>	<b>100.0%</b>

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 13 Dec 2021 09:21:59

**To:**

**Cc:**

**Subject:** FW: (300948) DC/21/06379LC

**Attachments:**

---

**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

**Sent:** 13 December 2021 09:12

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Subject:** (300948) DC/21/06379LC

**EP Reference : 300948**

**DC/21/06379. Land Contamination**

**Land East of, Ashfield Road, Elmswell, BURY ST EDMUNDS, Suffolk.**

**Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.**

Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

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](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*

---

**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

- 1. All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
- 2. A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
- 3. The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing*



and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.

4. The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.
5. The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.
6. Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.
7. Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.
8. Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.
9. Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.
10. A photographic record will be made of relevant observations.
11. The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be:
  - re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment;
  - treatment of material on site to meet compliance targets so it can be re-used;
  - removal from site to a suitably licensed landfill or permitted treatment facility.
12. A Verification Report will be produced for the work.

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 26 Nov 2021 03:46:25

**To:**

**Cc:**

**Subject:** FW: WK300949 DC2106379

**Attachments:**

---

**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk>

**Sent:** 26 November 2021 15:43

**To:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** WK300949 DC2106379

Environmental Health -  
Noise/Odour/Light/Smoke

**APPLICATION FOR PLANNING PERMISSION - DC/21/06379**

**Proposal:** Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

**Location:** Land East Of, Ashfield Road, Elmswell, Suffolk

Thank you for the opportunity to comment on this application. Having reviewed the documents I have the following comments to make.

The application site is in close proximity to a corner and the transport statement indicates that Grove Lane is used by HGV traffic to access an industrial estate and therefore there is potential for a loss of amenity at new dwellings. As such I would require an Environmental Noise Assessment (ENA).

Should the ENA identify that daytime and night-time ambient noise levels at dwellings exceed the WHO and BS8223 guideline values for both internal and external daytime noise and night-time WHO guidance levels for sleep disturbance in bedrooms then a scheme of mitigation shall be submitted for approval to show compliance prior to any permission being granted.

Construction Hours

Operations related to the construction (including site clearance and demolition) phases) of the permitted development/use shall only operate between the hours of 08.00 and 18.00hrs Mondays to Fridays and between the hours of 09.00 and 13.00hrs on Saturday. There shall be no working and/or use operated on Sundays and Bank Holidays. There shall be no deliveries to the development/use arranged for outside of these approved hours.

*Reason: to minimise detriment to nearby residential amenity*

Prohibition on burning.

No burning shall take place on site at any stage during site clearance, demolition or construction phases of the project.

*Reason: to minimise detriment to nearby residential amenity*

Dust control

The development shall not be commenced until a scheme specifying the provisions to be made to control dust emanating from the site has been submitted to and approved in writing by the local planning authority. The agreed scheme shall then be implemented in full before the proposed development is started, including demolition and site clearance.

*Reason: to minimise detriment to nearby residential amenity*

## Construction Management Plan

No development shall commence until a construction management plan has been submitted to and approved in writing by the Local Planning Authority. The construction management plan shall include details of:

Operating hours (to include hours for delivery)

Details of the scheduled timing/phasing of the development for the overall construction period

Means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors)

protection measures for footpaths surrounding the site

Loading and unloading of plant and materials

Wheel washing facilities

Lighting

Location and nature of compounds, pottraloos and storage areas (including maximum storage heights) and factors to prevent wind-whipping of loose materials

Waste storage and removal

Temporary buildings and boundary treatments

Dust management measures

Method of any demotion to take place, including the recycling and disposal of materials arising from demolition.

Noise and vibration management (to include arrangements for monitoring, and specific method statements for piling) and;

Litter and waste management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Note: the Construction Management Plan shall cover both demotion and construction phases of the above development. The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP.

*Reason: to minimise detriment to nearby residential amenity*

*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](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Sent:** 26 Nov 2021 10:12:37

**To:**

**Cc:**

**Subject:** FW: DC/21/06379

**Attachments:**

---

**From:** Simon Davison <Simon.Davison@babberghmidsuffolk.gov.uk>

**Sent:** 26 November 2021 09:57

**To:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Subject:** DC/21/06379

Dear Mahsa,

**APPLICATION FOR PLANNING PERMISSION - DC/21/06379**

**Proposal:** Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

**Location:** Land East Of, Ashfield Road, Elmswell, Suffolk.

Upon review of the application and associated documents the following condition must be met: No development shall commence above slab level until a scheme for the provision and implementation of water, energy and resource efficiency measures for the lifetime of the development shall be submitted to and approved, in writing, by the Local Planning Authority.

The scheme such include as a minimum to achieve:

- Agreement of provisions to ensure no more than 105 litres per person per day is used
- Agreement of provisions to ensure the development is zero carbon ready
- An electric car charging point per dwelling
- A Water-butt per dwelling
- Compost bin per dwelling
- Agreement of heating of each dwelling/building
- Agreement of scheme for waste reduction

Kind regards

Simon Davison PIEMA  
Senior Environmental Management Officer  
Babergh and Mid Suffolk District Councils - Working Together

Mobile: 07874 634932

t: 01449 724728

email: [simon.davison@babberghmidsuffolk.gov.uk](mailto:simon.davison@babberghmidsuffolk.gov.uk)

w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 29 Nov 2021 10:37:52

**To:**

**Cc:**

**Subject:** FW: (300947) DC/21/06379. AQ

**Attachments:**

---

**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

**Sent:** 29 November 2021 10:29

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Subject:** (300947) DC/21/06379. AQ

**EP Reference : 300947**

**DC/21/06379. Air Quality**

**Street Record, Ashfield Road, Elmswell, BURY ST EDMUNDS, Suffolk.**

**Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.**

I can confirm that the scale of development, at 19 dwellings, is not likely to be of a scale of that would compromise the existing good air quality at, and around the development site. When assessing the impacts of developments we give regard to the existing air quality at the site as provided by DEFRA background concentrations and also the number of likely vehicle movements. DEFRA and the Institute of Air Quality Management provide benchmarks of the scale of development that *may* start to cause a deterioration of air quality that requires further assessment. IAQM indicate that concerns may start to occur on developments which generate 500 vehicle movements a day – this development falls short of this threshold and as such further investigation is not warranted.

For details regarding how Babergh and Mid Suffolk District Councils approaches Air Quality including current reports and data, please view our website at <https://www.babergh.gov.uk/environment/air-quality/>. It should be noted that any documentation submitted in relation to a planning application should be sent directly to the Development Management Team and not the Environmental Protection Team as this may lead to delays in the planning process

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](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*

Our Ref: 21\_05695\_P  
Your Ref: DC/21/06379

16/12/2021

Dear Sir/Madam

**RE: Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses at land east of Ashfield Road, Elmswell, Suffolk**

The site is near to the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). Maps are available on the Board's webpages showing the Internal Drainage District ([https://www.wlma.org.uk/uploads/ESIDB\\_Index\\_plan.pdf](https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf)) as well as the wider watershed catchment ([https://www.wlma.org.uk/uploads/ESIDB\\_Watershed.pdf](https://www.wlma.org.uk/uploads/ESIDB_Watershed.pdf)).

I note that the applicant intends to discharge surface water to a watercourse within the watershed catchment of the Board's IDD. We request that this discharge is facilitated in line with [the Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 167 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Kind Regards,

Ellen

Ellen Moore  
Sustainable Development Officer  
Water Management Alliance



Jane Marson (Chairman) Michael Paul (Vice-Chairman)

Phil Camamile (Chief Executive)

Constituted by The East Suffolk Internal Drainage Board Order 2008  
Statutory Instrument 2008 No 750



**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 29 Nov 2021 09:00:01

**To:**

**Cc:**

**Subject:** FW: 2021-11-29 JS reply Land East Of, Ashfield Road, Elmswell, Suffolk Ref DC/21/06379

**Attachments:**

**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>

**Sent:** 29 November 2021 07:09

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Subject:** 2021-11-29 JS reply Land East Of, Ashfield Road, Elmswell, Suffolk Ref DC/21/06379

Dear Mahsa Kavyani,

Subject: Land East Of, Ashfield Road, Elmswell, Suffolk Ref DC/21/06379

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06379

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Site Location Plan Ref 4458-01
- Site Layout Plan Ref 4458-02d

A holding objection is necessary because the applicant has not submitted the necessary assessment of flood risk nor a detailed strategy for the disposal of surface water as required for a major, full planning application.

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA’s formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

The points below detail the action required to overcome our current objection:-

1. Submit a flood risk assessment
2. Submit a detailed strategy for the disposal of surface water
  - a. As a minimum, we require the following document and information to be submitted for each type of planning application or stage with the planning process.

Document Submitted	Document Description	Full
Flood Risk Assessment (FZ3 or Site >1Ha)	Evaluation of flood risk (fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)	✓
Drainage Strategy/Statement (less detail required for Outline)	Document that explains how the site is to be drained using SuDS principles. Shall include information on:- <ul style="list-style-type: none"> <li>• Existing drainage (inc adjacent roads)</li> <li>• Impermeable Area (Pre and Post Development)</li> <li>• Proposed SuDS</li> <li>• Hydraulic Calculations (see below)</li> <li>• Treatment Design (i.e. interception, pollution indices)</li> <li>• Adoption/Maintenance Details</li> <li>• Exceedance Paths</li> </ul>	✓
Contour Plan	Assessment of topography/flow paths/blue corridors	✓

<b>Impermeable Areas Plan</b>	Plan to illustrate new impervious surfaces	✓
<b>Evidence of any third party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner)</b>	Evidence of any permissions or permits being obtained.	✓
<b>Detailed Development Layout and SuDS Provision Plan (including landscaping details)</b>	Dimensioned plans showing the detailed development layout including SuDS components, open spaces and exceedance corridors.	✓
<b>Full SI Report</b>	Detailed assessment of ground conditions – leading on from initial testing <ul style="list-style-type: none"> <li>• Widespread coverage of trial pits to BRE 365</li> <li>• Contamination/Pollution check</li> <li>• Groundwater Monitoring</li> </ul>	✓
<b>Detailed Drainage Scheme Plan</b>	Dimensioned plan showing main aspects of the drainage infrastructure. Plans should ref:- <ul style="list-style-type: none"> <li>• SuDS details (size/volume)</li> <li>• Pipe Numbers/Sizes/Levels</li> <li>• Outfall &amp; Permitted Discharge (if applicable)</li> </ul>	✓
<b>Detailed SuDS Drawings (Open SuDS)</b>	Dimensioned plans of proposed SuDS components i.e. scaled cross sections/long sections	✓
<b>Full hydraulic calculations (MicroDrainage “Network” output)</b>	At this stage, SCC require simulations of the drainage network inc SuDS components. MicroDrainage Network should be submitted for 1,30 and 100yr+CC storms. (Source Control files are useful but not enough on their own)	✓
<b>Discharge Agreements</b>	Evidence of any permissions or permits being obtained.	✓
<b>Health and Safety Risk Assessment</b>	Where deep open SuDS (water level >0.5m) are proposed a H&S file will be required.	✓

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure  
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

**\*\*Note I am remote working for the time being\*\***



**From:** SM-NE-Crewe LUP Hub (NE)  
**Sent:** 29 November 2021 12:12  
**Subject:** DC/21/06379 For QC

Dear Sir or Madam,

Application ref: DC/21/06379  
Our ref: 375833

Natural England has no comments to make on this application.

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,

Oli Chenkin  
Natural England  
Consultation Service

**From:** Sarah Mansel (Cllr)  
**Sent:** 20 December 2021 14:39  
**Subject:** DC/21/06379

Good afternoon,

I wish to formally object to this application for 19 dwellings on this site which is less than 100 m from my home.

This is speculative application outside the settlement boundary, on the edge of Elmswell which has several allocated large developments already partially complete. The economic sustainability of the amenities in the village is secure without a further 19 dwellings here. MSDC now has over 9 years housing land supply so there is no need to develop here in the countryside.

It is interesting to note that both MSDC strategic housing and SCC highways have already raised objection to this development.

The applicant notes that the site is less than 2km from most of the amenities within the village but fails to highlight the fact that there is no safe pedestrian or cycle route into the village. Ashfield Road, despite being only a C class road is heavily used by HGVs and other commercial traffic. It is used as an alternative route between A14 and A143 because of the weight restriction on A1088 through Norton. In addition HC Wilson occupy a site along Grove Lane and their oversized HGVs make regular journeys to A14 along Grove Lane and Ashfield Road. There is no pavement on Grove Lane, and the pavement along Ashfield Road starts at Oak Lane about 400m south of the proposed site entrance. There is only a muddy slippery and rutted verge to walk along - this is not suitable for buggies or wheelchairs, nor for most people after dark. This cannot be regarded as a sustainable location for a further 19 dwellings. Most of the future occupants will be heavily reliant on the use of a motor vehicle, and the use of electric vehicles will not solve the issue of Ashfield Road already being a busy road.

This application site also forms one of the few remaining vestiges of the ancient (but undesignated) Bottenhaugh Green, once a common land shared between the 3 parishes of Elmswell, Gt Ashfield and Wetherden. Traditionally dwellings would have been sited on the edges of the common set back from the road, and this pattern of development is slowly being eroded away - so we need to preserve the remaining parts of open land which once formed the common.

Although this proposal does not have a high density of housing, it is still significantly higher density than the surrounding dwellings. This area is also a 'gateway' approach to the village from the north and has an 'edge of settlement' rural character. This proposal does not match the character of the surroundings.

I'm happy to discuss my concerns about this application and request that you keep me updated with your views as planning officer.

Many thanks

**Cllr Sarah Mansel**

Mid Suffolk District Councillor (Green Party)

Elmswell and Woolpit Ward

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 07 Dec 2021 09:14:53

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/06379

**Attachments:**

---

-----Original Message----- From: BMSDC Public Realm Consultation Mailbox Sent: 07 December 2021 09:12 To: BMSDC Planning Area Team Yellow Subject: RE: MSDC Planning Consultation Request - DC/21/06379 Public Realm Officers do not wish to offer any comments on this planning application. Regards Dave Hughes Public Realm Officer

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 02 Dec 2021 02:09:30

**To:**

**Cc:**

**Subject:** FW: Application - Elmswell, Land East of Ashfield Road IP30 9HQ

**Attachments:**

---

**From:** RM Archaeology Mailbox <archaeology@suffolk.gov.uk>

**Sent:** 02 December 2021 13:03

**To:** Planning Contributions Mailbox <planningcontributions.admin@suffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** RE: Application - Elmswell, Land East of Ashfield Road IP30 9HQ

Good afternoon,

We had seen this on the planning lists also and we have looked at this proposal. In our opinion there would be no significant impact on known archaeological sites or areas with archaeological potential. We have no objection to the development and do not believe any archaeological mitigation is required.

Best regards

Lisa

**Lisamaria De Pasquale**

Assistant Archaeological Officer (Technical Support)

Suffolk County Council Archaeological Service

Bury Resource Centre

Hollow Road

Bury St Edmunds

Suffolk IP32 7AY

Tel.: 01284 741230

M: 07523931041

Email: [lisa.depasquale@suffolk.gov.uk](mailto:lisa.depasquale@suffolk.gov.uk)

Website: <http://www.suffolk.gov.uk/archaeology>

Suffolk Heritage Explorer: <https://heritage.suffolk.gov.uk>

Follow us on Twitter: [@SCCArchaeology](https://twitter.com/SCCArchaeology)

Like us on Facebook: [@SCCArchaeologicalService](https://www.facebook.com/SCCArchaeologicalService)

Follow us on Instagram: [@SCCArchaeology](https://www.instagram.com/SCCArchaeology)

**Advanced notice:**

Please be advised that the SCCAS office will be closed from the 23rd December to the 4<sup>th</sup> January. General calls and emails will not be answered or monitored during this time.

(Please note there will be no FINDS appointments during the 20th December to the 6th January).

Your ref: DC/21/06379  
Our ref: Elmswell – land east of Ashfield Road  
60207  
Date: 04 May 2022  
Enquiries: Neil McManus  
Tel: 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mahsa Kavyani,  
Growth & Sustainable Planning,  
Babergh and Mid Suffolk District Councils,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
Suffolk,  
IP1 2BX

Dear Mahsa,

**Elmswell: land east of Ashfield Road – developer contributions**

I refer to the proposal: full planning application – erection of 19no. dwellings (including 6no. affordable units) and construction of new vehicular accesses.

A consultation response was previously submitted by way of letter dated 30 November 2021, which was time-limited to six months. This response remains valid for a further 6 months to 29 November 2022, unless the proposed scheme is amended.

However, issues to discuss and resolve with the local planning authority and the applicant include the following:

1. The Highway Authority holding objection dated 10 December 2021.
2. The lead local flood authority (LLFA) holding objection dated 10 February 2022.

Yours sincerely,



Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Growth, Highways & Infrastructure Directorate

cc Ben Chester, SCC (highways)  
Jason Skilton, SCC (LLFA)

**From:** BMSDC Planning Area Team Yellow <planningyellow@babermidsuffolk.gov.uk>

**Sent:** 30 Nov 2021 10:21:45

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/06379

**Attachments:**

---

-----Original Message----- From: East of England Region Sent: 30 November 2021 09:10 To: BMSDC Planning Area Team Yellow Subject: RE: MSDC Planning Consultation Request - DC/21/06379 T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990 Land East Of, Ashfield Road, Elmswell, Suffolk Application No. DC/21/06379 Thank you for your letter of 25/11/21 regarding the above application for planning permission. On the basis of the information available to date, in our view you do not need to notify or consult us on this application under the relevant statutory provisions, details of which are enclosed. If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request. Yours sincerely Charlie Field Historic Environment Advice Assistant E-mail: charlie.field@historicengland.org.uk Enclosure: List of applications requiring consultation with and notification to Historic England Planning and Listed Building Consent applications requiring consultation with and notification to Historic England (the Historic Buildings and Monuments Commission for England) April 2021 Introduction This enclosure sets out the circumstances in which Historic England must be consulted or notified of applications for planning permission or listed building consent. It has been amended to reflect the changes introduced by MHCLG on 21 April 2021 (a) extending planning controls to statues and other monuments and, (b) extending the range of applications for listed building consent notified to Historic England. Applications for planning permission Historic England must be consulted or notified (see note 1) of the following planning applications by virtue of the following provisions: Consultation: Development which in the opinion of the local planning authority falls within these categories: P1 Development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or II\* P2 Development likely to affect the site of a scheduled monument P3 Development likely to affect any battlefield or a Grade I or II\* park or garden of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953 Basis for this - Town and Country Planning (Development Management Procedure) (England) Order 2015 - article 18 and Schedule 4. P4 Development likely to affect certain strategically important views in London Basis for this - Secretary of State for Communities and Local Government Directions relating to Protected Vistas 2012 Notification: Development which the local authority (or Secretary of State) think would affect: P5 The setting of a Grade I or II\* listed building; or P6 The character or appearance of a conservation area where i) the development involves the erection of a new building or the extension of an existing building; and ii) the area of land in respect of which the application is made is more than 1,000 square metres Basis for this - Planning (Listed Buildings and Conservation Areas) Regulations 1990 - regulation 5A (as amended by The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015 P7 Local authority/ies own applications for planning permission for relevant demolition in conservation areas. (see note 2) Basis for this - Town and Country Planning General Regulations 1992 (as amended by the Town and Country Planning General (Amendment) (England) Regulations 2015 Note 1: There is a difference between Consultation and Notification. When LPAs consult on applications, there is a duty to provide a substantive response to the LPA within 21 days. A notification from the LPA is to enable representations to be made if we so wish, and to respond within 21 days. Historic England does not make a distinction in its handling of advice work. Applications for listed building consent Historic England must be notified of the following applications for listed building consent by virtue of the following provisions: Notification: L1 For works in respect of any Grade I or II\* listed building; and L2 For relevant works in respect of any grade II (unstarred) listed building (relevant works means: i) works for the demolition of any principal building (see note 3); ii) works for the alteration of any principal building which comprise or include the demolition of a principal external wall of the principal building; or iii) works for the alteration of any principal building which comprises or includes the demolition of all or a substantial part of the interior of the principal building. iv) commemorative object works. For the purposes of sub paragraphs ii) and iii) above: a) a proposal to retain less than 50% of the surface area of that part of a principal building represented on any elevation (ascertained by external measurement on a vertical plan, including the vertical plane of any roof) is treated as a proposal for the demolition of a principal external wall; b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.) For the purposes of sub paragraph iv) above: "commemorative object works" means works for the full or part demolition of a statue, monument, memorial or plaque that are, or are part of, a listed building L3 Decisions taken by the local planning authorities on these applications Basis for this - Arrangements for handling heritage applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021 - made under section 12, 15 (1) and (5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 Historic England 27 April 2021 Note 2: Relevant demolition is defined in section 196D of the Town and Country Planning Act 1990 as "demolition of a building that is

situated in a conservation area in England and is not a building to which section 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not apply by virtue of s75 of that Act (listed buildings, certain ecclesiastical buildings, scheduled monuments and buildings described in a direction of the Secretary of State under that section.) Note 3: "principal building" means a building shown on the list compiled under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and includes (unless the list entry indicates otherwise) any object or structure fixed to that building, but does not include any curtilage building.



Your ref: DC/21/06379  
 Our ref: Elmswell – land east of Ashfield Road  
 60207  
 Date: 30 November 2021  
 Enquiries: Neil McManus  
 Tel: 07973 640625  
 Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mahsa Kavyani,  
 Growth & Sustainable Planning,  
 Babergh and Mid Suffolk District Councils,  
 Endeavour House,  
 8 Russell Road,  
 Ipswich,  
 Suffolk,  
 IP1 2BX

Dear Mahsa,

**Elmswell: land east of Ashfield Road – developer contributions enquiry**

I refer to the proposal: full planning application – erection of 19no. dwellings (including 6no. affordable units) and construction of new vehicular accesses.

Summary of infrastructure requirements split between CIL/s106:

CIL	Education	
	- Secondary school expansion @ £23,775 per place	£71,325
	- Sixth form expansion @ £23,775 per place	£23,775
CIL	Libraries improvements @ £216 per dwelling	£4,104
CIL	Household waste @ £113 per dwelling	£2,147
S106	Education	
	- Primary school new provision @ £20,508 per place	£82,032
S106	Early years new provision @ £20,508 per place	£41,016
S106	Secondary school transport	£18,075
S106	Elmswell/Woolpit new footway/cycleway contribution @ £850 per dwelling	£16,150
S106	Monitoring fee per obligation	£412
S106	Highways	tbc

The National Planning Policy Framework (NPPF) [July 2021] paragraph 57 sets out the requirements of planning obligations, which are that they must be:

- a) *Necessary to make the development acceptable in planning terms;*
- b) *Directly related to the development; and,*

c) *Fairly and reasonably related in scale and kind to the development.*

The county council and district councils have a shared approach to calculating infrastructure needs, in the adopted Section 106 Developers Guide to Infrastructure Contributions in Suffolk.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

The emerging BMSDC Joint Local Plan contains policy proposals that will form an important tool for the day-to-day determination of planning application in both districts. Infrastructure is one of the key planning issues and the 'Infrastructure' chapter states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

### **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and charges CIL on planning permissions granted from 11 April 2016.

New CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) came into force on 1 September 2019 ("the commencement date"). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of 'relevant infrastructure').

The details of the impact on local infrastructure serving the proposed development are set out below:

- 1. Education.** The revised NPPF says in paragraph 95, *'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*
  - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
  - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'*

The NPPF in paragraph 106 says, '*Planning policies should:*

*a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.'*

In paragraph 15 of the DfE guidance it says, "*We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors*".

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for primary schools is £17,268 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£17,268/1.00) produces a total of £17,268 per pupil for permanent expansion of primary schools.

The most recent scorecard is 2019 and the national average new build cost per pupil for primary schools is £20,508 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national new build cost (£20,508 x 1.00) produces a total of £20,508 per pupil for new build primary schools.

The most recent scorecard is 2019 and the national average new build cost per pupil for secondary schools is £24,929 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national new build cost (£24,929/1.00) produces a total of £24,929 per pupil for new build of secondary schools.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775/1.00) produces a total of £23,775 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, "*further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place*".

SCC anticipates the following pupil yields from a development of 19 dwellings, namely:

- a) Primary school age range, 5-11: 4 pupils. Cost per place is £20,508 (2021/22 costs).
- b) Secondary school age range, 11-16: 3 pupils. Cost per place is £23,775 (2021/22 costs).
- c) Secondary school age range, 16+: 1 pupil. Costs per place is £23,775 (2021/22 costs).

The local schools are Elmswell County Primary School, Woolpit Primary Academy, Ixworth Free School, and Thurston Community College.

At the primary school level, the strategy is to deliver a new primary school at Woolpit which will also serve Elmswell. A school site has been secured as part of the scheme granted planning permission under reference DC/18/04247/OUT. On this basis, a proportionate capital contribution towards new build costs is sought from this proposed scheme.

At the secondary school level, the strategy is to expand existing provision to meet the demands arising from basic need and housing growth. On this basis, at the secondary school level a future CIL funding bid of at least £95,100 (2021/22 costs) will be made.

The nearest secondary school is Thurston Community College which is over 3-miles from the proposed development and accordingly pupils will be eligible for free school travel.

If the Council considers that planning permission should be granted for the proposed development, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the site-specific costs of secondary school transport. Contribution required as follows:

- a) **Secondary school transport contribution** – 3 secondary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Annual school transport cost per pupil is £1,205. Therefore, contribution is £1,205 x 3 pupils x 5 years = £18,075, increased by the RPI. Contribution held for a minimum period of 10 years from date of the final dwelling occupation. This contribution will be used for secondary school transport costs.

**2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: *'Promoting healthy and safe communities.'*

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

The recently published guidance from the Department for Education on Delivering schools to support housing growth states in paragraph 16: *"Developer contributions*

*for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school”.*

From these development proposals SCC would anticipate up to 2 FTE pre-school children arising, at a cost per place of £20,508.

This early years strategy is to deliver a new setting. An early years site is to be secured as part of the scheme under reference DC/18/02146/OUT. On this basis, a proportionate capital contribution towards new build costs is sought from this proposed scheme.

**3. Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: *‘Promoting healthy and safe communities.’* A key document is the ‘Quality in Play’ document fifth edition published in 2016 by Play England.

**4. Transport issues.** Refer to the NPPF Section 9: *‘Promoting sustainable transport.’*

A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Ben Chester will coordinate this.

A planning obligation or planning conditions will cover site specific matters.

A s106 contribution of £850 per dwelling is sought as a contribution towards the funding and delivery of a new footway/cycleway between Elmswell and Woolpit.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2019).

**5. Libraries.** Refer to the NPPF Section 8: *‘Promoting healthy and safe communities.’*

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e., £4,104, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

- 6. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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 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 that waste bins and garden composting bins should be provided before occupation of each dwelling, and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

A future CIL funding bid of at least £2,147 (£113 per dwelling) will be made to improve the HWRC provision at Stowmarket serving the proposed development.

- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 60 to 65 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g., Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority (LLFA). Paragraphs 159 – 169 refer to planning and flood risk and paragraph 167 states: *'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

- a) *within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
- b) *the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
- c) *it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
- d) *any residual risk can be safely managed; and*
- d) *safe access and escape routes are included where appropriate, as part of an agreed emergency plan.'*

And paragraph 169 says, '*Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*

- a) *take account of advice from the lead local flood authority;*
- b) *have appropriate proposed minimum operational standards;*
- c) *have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- d) *where possible, provide multifunctional benefits.'*

A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

**9. Ecology, landscape & heritage.** These are matters for the Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals. Refer to the MHCLG guidance on the Natural environment [updated 21 July 2019].

**10. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.

**11. Superfast broadband.** This should be considered as part of the requirements of the NPPF Section 10 '*Supporting high quality communications.*' SCC would recommend that all development is equipped with high-speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational

attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

**12. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

**13. Monitoring fee.** The new CIL Regs allow for the charging of monitoring fees. In this respect the county council charges £412 for each trigger point in a planning obligation, payable upon completion of the Deed.

**14.** The above information is time-limited for 6 months only from the date of this letter and/or will need to be reassessed if a planning application is submitted.

Yours sincerely,



Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Growth, Highways & Infrastructure Directorate

cc Sarah Hammond, SCC (education)  
Ben Chester, SCC (highways)  
Jason Skilton, SCC (LLFA)



# Consultee Comments for Planning Application DC/21/06379

## Application Summary

Application Number: DC/21/06379

Address: Land East Of Ashfield Road Elmswell Suffolk

Proposal: Full Planning Application - Erection of 19No dwellings (including 6No Affordable) and construction of new vehicular accesses.

Case Officer: Mahsa Kavyani

## Consultee Details

Name: Mrs Linda Hoggarth

Address: 26 Gipping Way, Bramford, Ipswich, Suffolk IP8 4HP

Email: Not Available

On Behalf Of: Mid Suffolk Disability Forum

## Comments

The Mid Suffolk Disability Forum would like to see a commitment to ensuring that all dwellings will meet Part M4 of the Building Regulations in this planning application.

All dwellings should be visitable and meet Part M4(1), and at least 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2).

It is also our view that 3% of the dwellings in housing developments of over 10 dwellings should be bungalows to assist people with mobility problems and to assist people who wish to downsize from larger dwellings. No bungalows appear to have been included in this development.

Every effort should be made to ensure all footpaths are wide enough for wheelchair users, with a minimum width of 1500mm, and that any dropped kerbs are absolutely level with the road for ease of access.

Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used.