

# Consultee Comments for Planning Application DC/22/00416

## Application Summary

Application Number: DC/22/00416

Address: Land Adjacent North Roundabout A140 Ipswich Road Brome Part In The Parish Of Thrandeston IP23 8AW

Proposal: Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development.

Case Officer: Alex Scott

## Consultee Details

Name: Mrs Sarah Foote Brome and Oakley Parish Council

Address: Church Hill, Hoxne IP21 5AT

Email: Not Available

On Behalf Of: Brome And Oakley Parish Clerk

## Comments

Brome and Oakley Parish Council considered this application at a meeting on 17 February 2022. It was agreed to recommend support for the application. However, the Parish Council is concerned with the errors on the plans, asks that these are corrected and due consideration is given to the residents of Four Oaks caravan park when determining this application and any conditions attached which may mitigate impacts to their residential amenity:

1. The site plan DOES NOT show Four Oaks residential caravan park which is in close proximity to the development. The park has been in operation for many years. It is presumed an historic map has been used for the site plan and this should be updated.
2. The compass position on the site plan and the phased construction plan do not match and therefore do not give a true indication of any prevailing winds. Again, this should be corrected to ensure that consideration is given for noise and smells which may be directed to the residential park.

-----Original Message-----

From: Philip Freeman <clerk@thrandestonparishcouncil.org>

Sent: 09 March 2022 22:21

To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: Re: MSDC Planning Consultation Request - DC/22/00416 - OUT

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I have submitted comments on the planning website but in adding photographs the comments were submitted before I had finished the Parish Council's comments. I have added them below and the photographs and video to ensure you have received them.

Thrandeston Parish Council's comments:

Thrandeston Parish Council has been contacted by landowners whose land is adjacent to this planning application. None of them have been notified and consulted and this has been the case with other applications for Eye Airfield. Their main cause of concern is the water run off and its impact on their land. The problem has been exacerbated by the work on the Drax sub station. Apparently, the drainage data is inaccurate and the drains are of insufficient capacity to cope with the increase in water from the Airfield as it is at present.

In the document prepared by Wilkinson Planning it states that there is no data from pluvial flood risk modelling therefore it cannot be taken into account. However, one landowner who has farmed close to the site for many years has seen a major increase in flooding on his land in recent years, see attached photographs and videos, following heavy rain.

This application was considered at the meeting of Thrandeston Parish Council on 9 March 2022 and the increase in runoff has been taken into account and the Parish Council objects to this application.

The increase in heavy periods of rain has exacerbated this problem and flooding has increased and is causing the farmers considerable difficulty during the period when crops are sown. The Parish Council believes the only option is not to allow this application unless the amount of run off following rainfall is reduced by at least 50% and this is before the area to be used for this application is concreted over.

From the flood risk assessment and drainage strategy it would appear that all additional surface water will be channeled into Thrandeston Beck with no holding features such as ponds being visible on any of the plans. The Beck is culverted under the railway line in a single location and it already cannot cope with the volume of water and speed of flow, leading to 30 acres of grazing and arable being flooded on a frequent basis. This development would significantly add to this problem affecting a greater area of land than is already. This problem has been getting significantly worse over the past 25 years at least, as the Eye Airfield has been developed. The local Internal Drainage Board manager is greatly

concerned about the huge increase in water going towards the Waveney. The IDB is also worried about flooding risk to the railway line at Thrandeston.

The attached photographs are a sample of the impact of flooding on the farmland to the west of the A140.

Regards,  
Philip Freeman  
Clerk to Thrandeston Parish Council.

On 02/02/2022 15:15, [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) wrote:

> Please find attached planning consultation request letter relating to  
> planning application - DC/22/00416 - Land Adjacent North Roundabout ,  
> A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

>  
> Kind Regards

>  
> Planning Support Team

>  
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--

Philip Freeman  
Clerk to Thrandeston Parish Council  
Email: [clerk@thrandestonparishcouncil.org](mailto:clerk@thrandestonparishcouncil.org)  
Phone: 07958 623897

**From:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 18 Mar 2022 09:51:40

**To:**

**Cc:**

**Subject:** FW: Planning DC/22/00416

**Attachments:**

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Hi Philip

Firstly sincere apologies for missing the meeting on Wednesday.

Can we just say that we are concerned as to why we were not informed of this planning application as we are probably one of the nearest dwellings to this plan.

We would like to put on record our concerns regarding the planning application, see above.

Our main concerns are as follows:- the plan that shows the flow of the water is incorrect! Please can we ask for a site visit?

1) Extra water flow entering into our ditches as we are given to understand that the surface water will be released via culverts on Alan Whiting's land then into our ditches and ultimately through out listed moat! The moat, in some places, is only 2 mts away from our dwelling. We are already noticing the rise in water levels that pass through our ditches each year, thus causing the moat to rise as the water cannot get away quick enough. The plans that have been submitted are incorrect and we suggest this is looked into.

2) We are also worried about the extra light pollution, this has got so much worse over the last few years.

3) What, if anything, would be done to prevent the extra waste and discarded rubbish that will happen. Our ditches are often blocked by rubbish now and we can only see it getting much worse.

4) There will be extra noise and traffic especially with lorries involved, which will undoubtedly affect the neighbours.

Kindest regards Sue & Mo Wade

Goswold Hall

Thrandeston

Sorry Philip but I can't seem to be able to get MSDC Planning on line can you help? Forward it?

Many thanks 😊

# **Consultee Comments for Planning Application DC/22/00416**

## **Application Summary**

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Case Officer: Alex Scott

## **Consultee Details**

Name: Mrs Michelle Salazar

Address: 1 Tacon Close, Eye, Suffolk IP23 7AU

Email: Not Available

On Behalf Of: Eye Town Clerk

## **Comments**

This development is not within the parish of Eye but the Town Council considers that additional light pollution could emanate from the development. Eye Town Council requests that lighting levels and time in operation be considered as part of the MSDC evaluation.

**From:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 21 Feb 2022 11:29:26

**To:**

**Cc:**

**Subject:** FW: DC/22/00416 NE Response

**Attachments:** NE local planning advice - discharges of foul drainage. Updated April 2020 (3).PDF

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**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

**Sent:** 18 February 2022 15:12

**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Subject:** DC/22/00416 NE Response



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Dear Sir/madam,

Application ref: 382808

Our ref: DC/22/00416

**Conservation of Habitats & Species Regulations 2017 (as amended)**

**Wildlife & Countryside Act 1981 (as amended)**

**Town and Country Planning (Development Management Procedure) (England) Order 2015**

This application has triggered one or more Impact Risk Zones, (available on [Magic](#) and as a downloadable [dataset](#)) indicating that impacts to statutory designated nature conservation sites (European sites or Sites of Special Scientific Interest) are likely. The designates site which could be impacted by this proposal is:

Gypsy Camp Meadows, Thrandeston SSSI

Natural England's consultation response to this planning application is provided in the form of an advice note tailored for this type of development proposal (attached). We anticipate that this will contain sufficient guidance to enable you to make an informed decision regarding impacts to designated sites. If the planning application does not contain the necessary detail, we recommend that you request this from the applicant before reaching a decision.

May we respectfully remind you of your responsibilities to take into account the advice of Natural England under the above legislation, and your biodiversity duties under [s40 of the NERC Act 2006](#). We will monitor planning decisions made using these advice notes, and may contact you again to ensure outcomes are being delivered effectively. Should you have any queries about how to apply the guidance, please contact us again.

Natural England has not assessed this application for impacts on protected species. We have 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.

Please note that Natural England has only provided comments in relation to impacts on statutory designated nature conservation sites. This should not be taken to imply that there are no other more local impacts to biodiversity or other natural environment interests, and it is for the local planning authority to determine whether or not this application is consistent with national and local policies on the protection and enhancement of 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. Further guidance on when to consult Natural England on planning and development proposals is available on [gov.uk](#).

For any queries relating to the specific advice in this letter only please contact me using the contact details below. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours,

Luke Turnbull  
Natural England  
Consultation Service  
Hornbeam House  
Crewe Business Park, Electra Way,  
Crewe, Cheshire, CW1 6GJ

Tel: +447500 525673

Email: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)  
For further information on the Pre-submission Screening Service see [here](#)

-----Original Message-----

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>  
Sent: 02 February 2022 15:18  
To: SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>  
Subject: MSDC Planning Consultation Request - DC/22/00416 - OUT

Please find attached planning consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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## NATURAL ENGLAND'S LOCAL PLANNING CONSULTATION ADVICE FOR

### DISCHARGES TO GROUND OR SURFACE WATER

Natural England's initial screening of this planning application suggests that impacts to designated sites caused by foul drainage arrangements need to be considered by your authority (i.e. the relevant Impact Risk Zone has been triggered).

The assessment of impacts from small sewage discharges (SSD) of up to 5 cubic metres per day may be assessed by following the process outlined below. We therefore advise you to review the planning application under consideration, and apply the following generic advice, as appropriate.

Please note that this advice only applies to development proposals within Essex, Hertfordshire, Cambridgeshire, Bedfordshire, Northants, Norfolk and Suffolk.

Most foul water is removed from a development site by a mains sewer. If a house or business is within 30m of a mains sewer, the expectation is that this will form the foul drainage arrangement. If a mains sewer connection is not proposed, and the property is more than 30m away from the nearest sewer your sewage may go to one of the following small sewage options:

- a septic tank - an underground tank which is part of a sewage treatment system where the solids sink to the bottom and the liquid flows out and soaks through the ground
- a small sewage treatment plant (also known as a package treatment plant) - a part mechanical system that treats the liquid so it's clean enough to go into a river or stream
- a cesspool (also called a cesspit) - a sealed tank that collects the sewage but without treatment, stores the waste and requires regular emptying by a tanker
- a non-standard system, e.g. a reed bed or a trench arch system

Please refer to the decision tree at Annex A to assesses whether the discharge needs an Environmental Permit and a Habitats Regulation Assessment or SSSI Assessment.

#### **Is the discharge to surface water?**

If the discharge is to surface water such as a ditch, stream or intertidal area discharges must preferably not be in or within 500m<sup>1</sup> of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, biological Site of Special Scientific Interest (SSSI), designated bathing water, or protected shellfish water; 200m of an aquatic local nature reserve; 50m of a chalk river or aquatic local wildlife site. If within this distance you will need to apply to the Environment Agency for a permit, and associated assessment work. Furthermore, within this distance it should be regarded as likely to have a significant effect to the European site (SPA, SAC, Ramsar), and further assessment work should be requested of the applicant, to inform your Habitats Regulations Assessment (see below), or consideration of the SSSI, as appropriate.

The sewage must only be domestic. The discharge must be less than 5 cubic metres per day in volume. The discharge must not cause pollution of surface water or groundwater. The sewage must receive treatment from a sewage treatment plant. New discharges must not be within 30m of a public foul sewer. Discharges must be made to a watercourse that normally has flow throughout the year and must not be made to an enclosed lake or pond.

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<sup>1</sup> The distances specified in this section are taken to be the length of watercourse, not as the crow flies.



## Is the discharge to ground water?

If the discharge is to ground water through a soakaway or drainage field then discharges must not be in, or within 50m of an SAC, SPA, Ramsar site, or biological SSSI, and must not be within an Ancient Woodland. If within this distance the applicant will need to apply to the Environment Agency for a permit. You can find out where ancient woodlands are on the [Magic website](#). If within this distance, it should also be regarded as likely to have a significant effect to the European site (SPA, SAC, Ramsar), and further assessment work should be requested of the applicant to inform your Habitats Regulations Assessment (see below), or consideration of the SSSI, as appropriate.

The discharge must be less than 2 cubic metres in volume. The sewage must only be domestic. The discharge must not cause pollution of surface water or groundwater. The sewage must receive treatment from a septic tank and infiltration system (drainage field) or a sewage treatment plant and infiltration system.

## Is the proposed discharge close to a protected site?

Natural England has published a set of mapped Impact Risk Zones (IRZs) for SSSIs. This GIS tool can be used to help consider whether a proposed development is likely to affect a SSSI. Please see [Magic](#) and the IRZ [dataset](#) which includes user guidance.

If the discharge location is within or in close proximity to a Special Area of Conservation, Special Protection Area or Ramsar then it will be necessary for the applicant to provide sufficient information for you as the Competent Authority to conduct a Habitats Regulation Assessment in accordance with their duties under the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'). In considering the European site interest, Natural England advises that the competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have<sup>2</sup>. The [Conservation objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

Where foul water is discharged either to ground to clearly filter away from the site, or into a nearby watercourse to clearly flow away from the development its impact will not need to be assessed. If the treated water flows towards a Site of Special Scientific Interest (SSSI), the closer it discharges to the SSSI, the less time there is for it to be diluted before it reaches the site. Therefore, at greater distances from the SSSI, only those developments with a greater discharge volume are likely to have an impact. The sewage discharge thresholds are aligned with Environment Agency permitting.

## What is the expected discharge volume?

It is necessary to ascertain whether the sewage discharge method proposed is appropriate and sufficient to handle the expected discharges throughout the year, including peak flows if use is occasional or seasonal. The expected discharge volume for proposed developments may be estimated using the daily discharge calculator for domestic properties which can be [found here](#).

As a general rule of thumb developments likely to fall below 5 cubic metres (5000 Litres) per day discharge include:

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<sup>2</sup> Requirements are set out within regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

In December 2012, Defra carried out a consultation on draft Core Guidance for developers, regulators & land/marine managers. This remains the most comprehensive guidance in relation to the implementation of the Habitats Regulations. This can be found on the Gov.uk website at the following page [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/82706/habitats-simplify-guide-draft-20121211.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82706/habitats-simplify-guide-draft-20121211.pdf)

- Individual dwellings
- 5 homes of 4 bedroom or less
- 6 homes of 3 bedrooms or less
- 8 flats or small homes of 2 bedrooms or less

### **What information should be provided within the application for a HRA or SSSI assessment?**

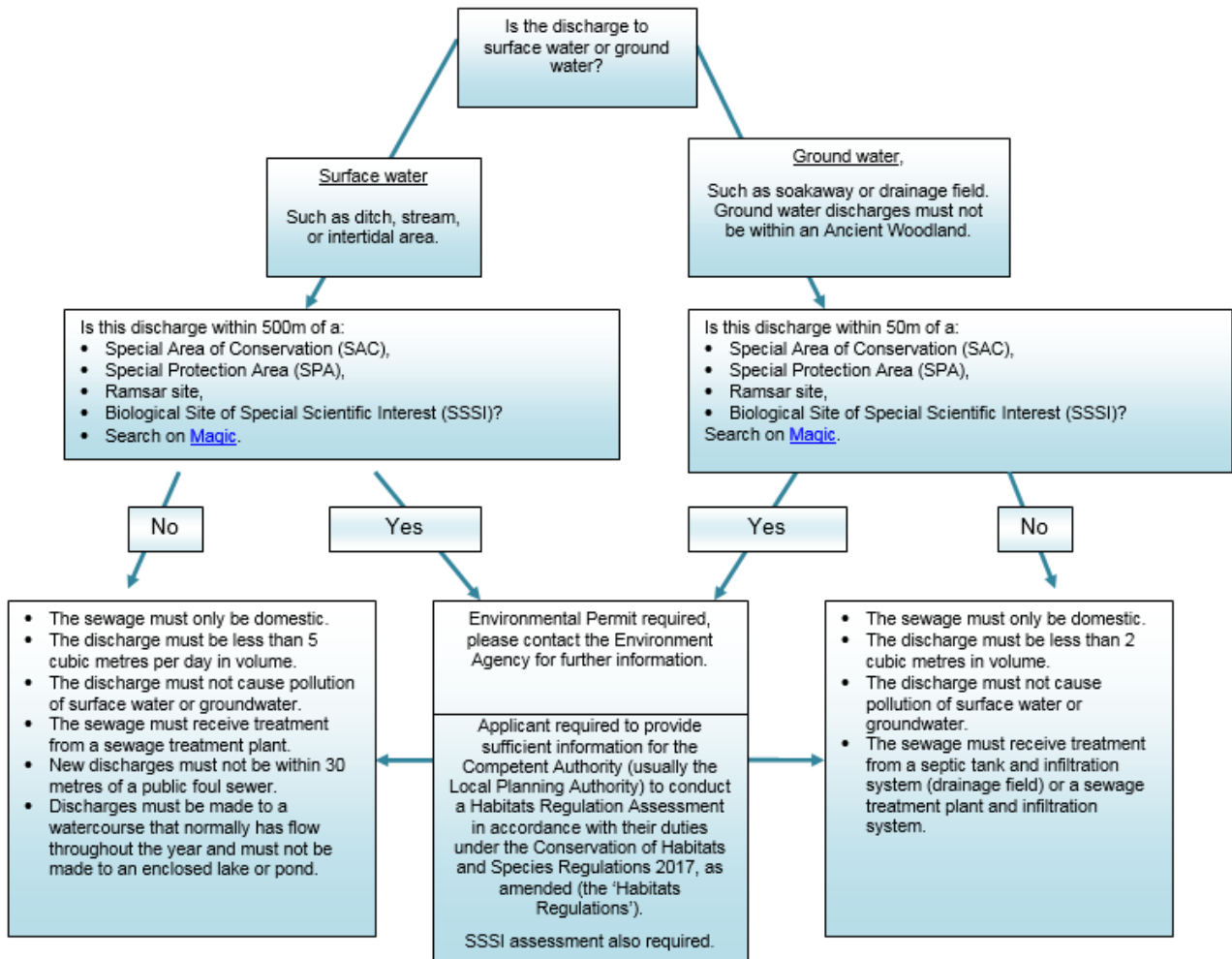
The information provided by the applicant should fulfil the requirements of the permits and general binding rules as outlined with Annex B and allow the Competent Authority to complete a HRA. For example:

- How the septic tank will work
- How often will the tank be serviced and emptied
- Will the tank have a bund around it
- Where is the tank/Where is the outfall
- Does the nearest watercourse flow all year
- If the tank overflows would it soak away to ground or to a ditch or direct to the river
- How deep is the water table
- Does the area regularly flood

### **Licensing**

If a discharge does not meet the general binding rules as outlined in Annex A, then it will require a Small Sewage Discharges Permit from the Environment Agency. Applicants should consult the [GOV.UK](https://www.gov.uk) website to confirm whether their proposal will require a permit early in the development stage.

## Annex A Decision Tree to assesses whether the discharge needs an Environmental Permit and a HRA or SSSI Assessment.



## Annex B Septic tanks and treatment plants: permits and general binding rules

General binding rules for small sewage discharges (SSDs) came into effect from January 2015. The general binding rules consist of the conditions together with technical requirements specified by the Environment Agency in guidance to operators, compliance with which is part of the conditions. These will apply to anyone who has a septic tank or sewage treatment plant that makes a small sewage discharge, from January 2015. For further details please refer to [www.gov.uk](http://www.gov.uk)

The following general binding rules apply to all small sewage discharges are summarised below for your convenience.

Discharges to Surface Water	Discharges to Ground Water	General Binding Rule
	X	The discharge must be 2 cubic metres or less per day in volume.
X		The discharge must be 5 cubic metres or less per day in volume.
X	X	The sewage must only be domestic.
X	X	The discharge must not cause pollution of surface water or groundwater.
	X	The sewage must receive treatment from a septic tank and infiltration system (drainage field) or a sewage treatment plant and infiltration system.
X		The sewage must receive treatment from a sewage treatment plant.
	X	The discharge must not be within a groundwater Source Protection Zone 1 or within 50m from any well, spring or borehole that is used to supply water for domestic or food production purposes.
X		For discharges in tidal waters, the discharge outlet must be below the mean spring low water mark.
X	X	All works and equipment used for the treatment of sewage effluent and its discharge must comply with the relevant design and manufacturing standards i.e. the British Standard that was in force at the time of the installation, and guidance issued by the appropriate authority on the capacity and installation of the equipment.
X	X	The system must be installed and operated in accordance with the manufacturer's specification.
X	X	Maintenance must be undertaken by someone who is competent.
X	X	Waste sludge from the system must be safely disposed of by an authorised person.

X	X	If a property is sold, the operator must give the new operator a written notice stating that a small sewage discharge is being carried out, and giving a description of the waste water system and its maintenance requirements.
X	X	The operator must ensure the system is appropriately decommissioned where it ceases to be in operation so that there is no risk of pollutants or polluting matter entering groundwater, inland fresh waters or coastal waters.
X	X	New discharges must not be within 30 metres of a public foul sewer
X	X	For new discharges, the operator must ensure that the necessary planning and building control approvals for the treatment system are in place.
X		New discharges must not be in or within: 500m of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, biological Site of Special Scientific Interest (SSSI), designated bathing water, or protected shellfish water; 200m of an aquatic local nature reserve; 50m of a chalk river or aquatic local wildlife site. If within this distance you will need to apply to EA for a permit.
	X	New discharges must not be in, or within 50m of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, or biological Site of Special Scientific Interest (SSSI), and must not be in an Ancient Woodland. If within this distance you will need to apply to EA for a permit.
X		New discharges must be made to a watercourse that normally has flow throughout the year.
X		For new discharges, any partial drainage field must be installed within 10m of the bank side of the watercourse.
X		New discharges must not be made to an enclosed lake or pond.



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

**Our ref:** AE/2022/126821/01-L01  
**Your ref:** DC/22/00416  
**Date:** 18 February 2022

Dear Mr Scott

**APPLICATION FOR OUTLINE PLANNING PERMISSION. (ALL MATTERS RESERVED) ERECTION OF PETROL AND ELECTRIC CHARGING FACILITY WITH ASSOCIATED SHOP, ROADSIDE RESTAURANT WITH DRIVE THROUGH FACILITY, B1 AND B8 STARTER UNITS, HGV LORRY PARKING FACILITY FOR REST AREA AND DRIVERS' FACILITIES AS A PHASED DEVELOPMENT. LAND ADJACENT NORTH ROUNDABOUT A140 IPSWICH ROAD BROME PART IN THE PARISH OF THRANDESTON  
IP23 8AW**

Thank you for your consultation on the 02 February 2022 for the above application. We have reviewed the documents as submitted and we object to the development on pollution of controlled water grounds as outlined below. We have also included additional comments on how to overcome our objection as well as comments relating to pollution below.

### **Water Pollution**

We object to the proposed development as submitted because there is insufficient information to demonstrate that the risk of pollution to controlled waters is acceptable:

1. We consider the level of risk posed by this proposal to be unacceptable.
2. The application fails to provide assurance that the risks of pollution are understood.

It should be noted that if this objection is removed by satisfying the aforementioned points, planning conditions may be recommended, specifically relating to contaminated land and tank design.

### **Reason**

To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF 2021), paragraphs 174, 183 and 184 and Environment Agency

Groundwater Protection website.

### **Overcoming Our Objection**

The applicant should provide a comprehensive and balanced options appraisal fairly comparing above and below ground storage, with appropriate mitigation measures to demonstrate best available technique, including above the normal practice measures described in the Association for Petroleum and Explosives Administration document: Guidance for Design, Construction, Modification, Maintenance and Decommissioning of Filling Stations (Revised June 2011) where necessary. The requirements of our Groundwater Protection Position Statements D1 to D4 need to be met. This assessment should consider the underlying sensitive groundwater bodies, the nearby abstractions and associated source protection zone, and the peak seasonal depth to groundwater at the site.

### **Advice to LPA / Applicant**

The site is underlain by superficial Lowestoft Formation deposits designated as a Secondary (undifferentiated) Aquifer, this is then underlain by Crag, which is designated as a Principal aquifer. The site is located within a Groundwater Source Protection Zone (SPZ), namely SPZ 3 (Total Catchment) designated for the protection of Public Water Supply (PWS) Abstraction at Elmswell, located approximately 2.1.m south-southeast of the proposed development. The depth to groundwater is not known, nor is the nature of the underlying soils as they can be variable based on nearby scanned BGS borehole logs (the closest being c. 350m west of the proposed development). The location of the site is therefore considered to be of medium environmental sensitivity.

It was noted in the Goldfinch GeoEnvironmental Desk Study Report – Phase 1 of September 2021 (ref: 0795/1) report in section 8 the issues associated with petrol filling stations that may be encountered, which could have been resolved prior to the application being submitted.

We have reviewed the documents submitted with the application as part of our response and have the associated comments detailed below.

There is no indication as to whether tanks for the development will be below or above ground. Given the site is located within SPZ3 and overlies a principal aquifer, any spills or leaks have the potential to derogate the nearby licenced abstractions. We consider that the risk from the development, as proposed, is likely to be incompatible with the environmental sensitivity of the site. In line with our Groundwater Protection Position Statements D1 and D2, we only agree to underground storage outside of an SPZ1 where the:

- 1) activity cannot take place within unproductive strata
- 2) storage must be underground (for example public safety), in which case it is expected that the risks are appropriately mitigated

Furthermore, due to the local geology, there is a possibility of shallow groundwater at the site (be it perched or otherwise). In line with our Groundwater Protection Position Statement D3, we would also object on these grounds. We would require a detailed assessment of groundwater levels at the site, to include seasonal fluctuations and different strata. It should be noted that this monitoring may take a full year to determine peak groundwater levels and should have been undertaken prior to submitting the planning application. If groundwater appears to be significantly deeper than the proposed underground tanks, we may consider conditioning the application if the other grounds for objection are satisfied.

We adopt the precautionary principle to protecting groundwater because of:

- the difficulties associated with observing and remediating leaks from underground storage and transmission facilities;
- the previous history of pollution from such facilities.

Any proposals for fuel storage at this location would need to be accompanied by a detailed risk assessment carefully considering the risk to the SPZ3 and PWS abstractions. The risk assessment should be based on site-specific data regarding site specific geology, the hydrogeological setting of the site, groundwater flow direction and hydraulic continuity between different aquifer units. We would only agree to the development if it could be shown that there is no pathway connecting groundwater at the site to the PWS abstractions.

The proposal would also have to comply with the remaining Groundwater Protection Position Statements and include adequate pollution prevention / risk mitigation measures as underpinned by the risk assessment.

It should be noted that in environmentally sensitive locations, we expect standards to be in excess of those in the Blue Book, and the double skinned tank with leak detection proposed is not considered sufficiently robust protection to controlled waters.

We would favour above ground tanks with very robust pollution prevention measures instead of underground storage tanks. It is possible to design above ground tanks to satisfy the requirements of the petroleum officer and we have examples of where this has been successfully implemented in the past. The nature of above ground tanks allows any leaks to be observed, contained and remediated with much greater ease than with below ground tanks where leaks can go undetected and clean up can be troublesome and potentially very disruptive and expensive.

The Goldfinch GeoEnvironmental Desk Study Report – Phase 1 of September 2021 (ref: 0795/1) supplied has been fully reviewed. We do not agree with the conclusion of the report. Whilst the site is on the periphery of a disused airfield, it is still within the curtilage of a disused airfield, and as such as classified as a potentially contaminative past use. Intrusive site investigation, which will be required to lift the objection on below ground tank grounds too, is also required to assess the possibility of any contamination associated with a former airfield. Please note that former airfields have many potential contaminants associated with them. Including emerging contaminants such as PFOS and PFOA and any other substances associated with firefighting foams.

The Plandescil Flood Risk Assessment & Surface Water Drainage Strategy of September 2021 (ref: 27665) does not go into much detail in the surface water strategy but suggests that there may be unlined lagoons taking runoff including runoff from the forecourt. This would not be considered acceptable. Forecourt runoff should be collected via a suitable capacity oil-water interceptor and disposed of via mains sewer with consent. The pollution risk from forecourt runoff to ground (and watercourse) would be considered high. Even with an oil-water interceptor, dissolved phase hydrocarbon contamination would be present in the discharge. Please revise accordingly taking into account the pollution risk to the water environment.

**We recommend that developers should:**

1) Refer to our 'Groundwater Protection' website;

2) Refer to our Land Contamination: Risk Management website when dealing with land affected by contamination. This is based on CLR11 which is archived within CL:AIRE Water and Land Library (WALL), and also includes the Guiding Principles for Land



Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health;

3) Refer to our Land Contamination Technical Guidance;

4) Refer to 'Position Statement on the Definition of Waste: Development Industry Code of Practice';

5) Refer to British Standards BS 5930:1999 A2:2010 Code of practice for site investigations and BS10175:2011 A1: 2013 Investigation of potentially contaminated sites – code of practice

6) Refer to our 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination' National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of 'Piling Into Contaminated Sites';

7) Refer to our 'Good Practice for Decommissioning Boreholes and Wells'.

8) Refer to our 'Dewatering building sites and other excavations: environmental permits' guidance when temporary dewatering is proposed

We trust this advice is useful

Yours sincerely



**Mr Andrew Thornton**  
**Planning Advisor**

Direct dial: 02030253127

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

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

**Our ref:** AE/2022/126821/02-L01  
**Your ref:** DC/22/00416  
**Date:** 08 April 2022

Dear Sir/Madam

**ERECTION OF PETROL AND ELECTRIC CHARGING FACILITY WITH ASSOCIATED SHOP, ROADSIDE RESTAURANT WITH DRIVE THROUGH FACILITY, B1 AND B8 STARTER UNITS, HGV LORRY PARKING FACILITY FOR REST AREA AND DRIVERS' FACILITIES AS A PHASED DEVELOPMENT.**

**LAND ADJACENT NORTH ROUNDABOUT A140 IPSWICH ROAD BROME PART IN THE PARISH OF THRANDESTON, IP23 8AW.**

Thank you for your consultation which was received on 24 March 2022. We have reviewed the planning documents submitted and can confirm we are maintaining our holding objection.

We refer to our objection letter of 18 February 2022 (ref: AE/2022/126821/01-L01), the points raised within this letter remain relevant. We could not find, submitted online any documents that addressed our objection. We therefore reiterate the points made in this letter.

Please reconsult us once the requested information is provided and we will provide bespoke comments on the updated application within 21 days.

We trust this advice is useful.

Yours faithfully

**Miss Neve Cooper**  
**Planning Officer**

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

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

**Our ref:** AE/2022/126821/03-L01  
**Your ref:** DC/22/00416  
**Date:** 30 August 2022

Dear Sir/Madam

**APPLICATION FOR OUTLINE PLANNING PERMISSION. (ALL MATTERS RESERVED) ERECTION OF PETROL AND ELECTRIC CHARGING FACILITY WITH ASSOCIATED SHOP, ROADSIDE RESTAURANT WITH DRIVE THROUGH FACILITY, B1 AND B8 STARTER UNITS, HGV LORRY PARKING FACILITY FOR REST AREA AND DRIVERS' FACILITIES AS A PHASED DEVELOPMENT.**

**LAND ADJACENT NORTH ROUNDABOUT A140 IPSWICH ROAD BROME PART IN THE PARISH OF THRANDESTON, IP23 8AW**

Thank you for your consultation dated 03 August 2022. We have reviewed the planning documents submitted and can confirm we are maintaining our holding objection.

We refer to our objection letter of 08 April 2022 (ref: AE/2022/126821/02-L01), the points raised within this letter remain relevant. We could not find, submitted online any documents that addressed our objection. We therefore reiterate the points made in this letter.

Please reconsult us once the requested information is provided and we will provide bespoke comments on the updated application within 21 days.

We trust this advice is useful.

Yours faithfully,

**Miss Neve Cooper  
Planning Officer**

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

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

**Our ref:** AE/2022/126821/04-L01  
**Your ref:** DC/22/00416  
**Date:** 15 September 2022

Dear Mr Scott,

**APPLICATION FOR OUTLINE PLANNING PERMISSION. (ALL MATTERS RESERVED) ERECTION OF PETROL AND ELECTRIC CHARGING FACILITY WITH ASSOCIATED SHOP, ROADSIDE RESTAURANT WITH DRIVE THROUGH FACILITY, B1 AND B8 STARTER UNITS, HGV LORRY PARKING FACILITY FOR REST AREA AND DRIVERS' FACILITIES AS A PHASED DEVELOPMENT.**

**LAND ADJACENT NORTH ROUNDABOUT A140 IPSWICH ROAD BROME PART IN THE PARISH OF THRANDESTON IP23 8AW**

Thank you for your consultation on the 12 September 2022 and we apologise for the error in our first response. We have reviewed the documents as submitted and we object to the development on pollution of controlled water grounds as outlined below. We have also included additional comments on how to overcome our objection as well as comments relating to pollution below.

### **Water Pollution**

We object to the proposed development as submitted because there is insufficient information to demonstrate that the risk of pollution to controlled waters is acceptable:

1. We consider the level of risk posed by this proposal to be unacceptable.
2. The application fails to provide assurance that the risks of pollution are understood.

It should be noted that if this objection is removed by satisfying the aforementioned points, planning conditions may be recommended, specifically relating to contaminated land and tank design.

### **Reason**

To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF 2021), paragraphs 174, 183 and 184 and Environment Agency Groundwater Protection website.

## **Overcoming Our Objection**

The applicant should provide a comprehensive and balanced options appraisal fairly comparing above and below ground storage, with appropriate mitigation measures to demonstrate best available technique, including above the normal practice measures described in the Association for Petroleum and Explosives Administration document: Guidance for Design, Construction, Modification, Maintenance and Decommissioning of Filling Stations (Revised June 2011) where necessary. The requirements of our Groundwater Protection Position Statements D1 to D4 need to be met. This assessment should consider the underlying sensitive groundwater bodies, the nearby abstractions and associated source protection zone, and the peak seasonal depth to groundwater at the site.

## **Advice to LPA / Applicant**

The site is underlain by superficial Lowestoft Formation deposits designated as a Secondary (undifferentiated) Aquifer, this is then underlain by Crag, which is designated as a Principal aquifer. The site is located within a Groundwater Source Protection Zone (SPZ), namely SPZ 3 (Total Catchment) designated for the protection of Public Water Supply (PWS) Abstraction at Eye, located approximately 2.1.m south-southeast of the proposed development. The depth to groundwater is not known, nor is the nature of the underlying soils as they can be variable based on nearby scanned BGS borehole logs (the closest being c. 350m west of the proposed development). The location of the site is therefore considered to be of medium environmental sensitivity.

It was noted in the Goldfinch GeoEnvironmental Desk Study Report – Phase 1 of September 2021 (ref: 0795/1) report in section 8 the issues associated with petrol filling stations that may be encountered, which could have been resolved prior to the application being submitted.

We have reviewed the documents submitted with the application as part of our response and have the associated comments detailed below.

There is no indication as to whether tanks for the development will be below or above ground. Given the site is located within SPZ3 and overlies a principal aquifer, any spills or leaks have the potential to derogate the nearby licenced abstractions. We consider that the risk from the development, as proposed, is likely to be incompatible with the environmental sensitivity of the site. In line with our Groundwater Protection Position Statements D1 and D2, we only agree to underground storage outside of an SPZ1 where the:

- 1) activity cannot take place within unproductive strata
- 2) storage must be underground (for example public safety), in which case it is expected that the risks are appropriately mitigated

Furthermore, due to the local geology, there is a possibility of shallow groundwater at the site (be it perched or otherwise). In line with our Groundwater Protection Position Statement D3, we would also object on these grounds. We would require a detailed

assessment of groundwater levels at the site, to include seasonal fluctuations and different strata. It should be noted that this monitoring may take a full year to determine peak groundwater levels and should have been undertaken prior to submitting the planning application. If groundwater appears to be significantly deeper than the proposed underground tanks, we may consider conditioning the application if the other grounds for objection are satisfied.

We adopt the precautionary principle to protecting groundwater because of: - the difficulties associated with observing and remediating leaks from underground storage and transmission facilities; - the previous history of pollution from such facilities. Any proposals for fuel storage at this location would need to be accompanied by a detailed risk assessment carefully considering the risk to the SPZ3 and PWS abstractions. The risk assessment should be based on site-specific data regarding site specific geology, the hydrogeological setting of the site, groundwater flow direction and hydraulic continuity between different aquifer units. We would only agree to the development if it could be shown that there is no pathway connecting groundwater at the site to the PWS abstractions.

The proposal would also have to comply with the remaining Groundwater Protection Position Statements and include adequate pollution prevention / risk mitigation measures as underpinned by the risk assessment.

It should be noted that in environmentally sensitive locations, we expect standards to be in excess of those in the Blue Book, and the double skinned tank with leak detection proposed is not considered sufficiently robust protection to controlled waters.

We would favour above ground tanks with very robust pollution prevention measures instead of underground storage tanks. It is possible to design above ground tanks to satisfy the requirements of the petroleum officer and we have examples of where this has been successfully implemented in the past. The nature of above ground tanks allows any leaks to be observed, contained and remediated with much greater ease than with below ground tanks where leaks can go undetected and clean up can be troublesome and potentially very disruptive and expensive.

The Goldfinch GeoEnvironmental Desk Study Report – Phase 1 of September 2021 (ref: 0795/1) supplied has been fully reviewed. We do not agree with the conclusion of the report. Whilst the site is on the periphery of a disused airfield, it is still within the curtilage of a disused airfield, and as such as classified as a potentially contaminative past use. Intrusive site investigation, which will be required to lift the objection on below ground tank grounds too, is also required to assess the possibility of any contamination associated with a former airfield. Please note that former airfields have many potential contaminants associated with them. Including emerging contaminants such as PFOS and PFOA and any other substances associated with firefighting foams.

The Plandescil Flood Risk Assessment & Surface Water Drainage Strategy of September 2021 (ref: 27665) does not go into much detail in the surface water strategy but suggests that there may be unlined lagoons taking runoff including runoff from the forecourt. This would not be considered acceptable. Forecourt runoff

should be collected via a suitable capacity oil-water interceptor and disposed of via mains sewer with consent. The pollution risk from forecourt runoff to ground (and watercourse) would be considered high. Even with an oil-water interceptor, dissolved phase hydrocarbon contamination would be present in the discharge. Please revise accordingly taking into account the pollution risk to the water environment.

We recommend that developers should:

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

We trust this advice is useful

Yours sincerely,

**Miss Neve Cooper**  
**Planning Officer**

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

**From:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 28 Mar 2022 09:54:04

**To:**

**Cc:**

**Subject:** FW: Not Connecting - MSDC Planning Re-consultation Request - DC/22/00416 - OUT

**Attachments:** ufm9\_Standard\_Re-consultation\_Letter.pdf

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**From:** Planning Liaison <planningliaison@anglianwater.co.uk>

**Sent:** 26 March 2022 09:04

**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Subject:** FW: Not Connecting - MSDC Planning Re-consultation Request - DC/22/00416 - OUT



**EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Dear Planning Team,

Thank you for your consultation. Having reviewed the development, there is no connection to the Anglian Water sewers, we therefore have no comments.

If this is to change, please re-consult with us.

Kind regards,

Minu

Planning & Capacity Team

Development Services

Telephone: 07929 786 955

Anglian Water Services Limited

Thorpe Wood House, Thorpe Wood, Peterborough,

Cambridgeshire, PE3 6WT

-----Original Message-----

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Sent:** 24 March 2022 11:53

**To:** Planning Liaison <[planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)>

**Subject:** Not Connecting - MSDC Planning Re-consultation Request - DC/22/00416 - OUT

**\*EXTERNAL MAIL\*** - Please be aware this mail is from an external sender - THINK BEFORE YOU CLICK

Please find attached planning re-consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

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Historic England

Mr Alex Scott  
Babergh Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Direct Dial: -

Our ref: **W:** P01454714

3 February 2022

Dear Mr Scott

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND ADJACENT NORTH ROUNDABOUT A140, IPSWICH ROAD, BROME PART  
IN THE PARISH OF THRANDESTON, IP23 8AW  
Application No. DC/22/00416**

Thank you for your letter of 2 February 2022 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

**Hannah Blackmore**  
Business Officer  
E-mail: [Hannah.Blackmore@historicengland.org.uk](mailto:Hannah.Blackmore@historicengland.org.uk)



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





**National Highways Planning Response (NHPR 21-09)  
Formal Recommendation to an Application for Planning Permission**

From: Martin Fellows (Regional Director)  
Operations Directorate  
East Region  
National Highways  
[PlanningEE@highwaysengland.co.uk](mailto:PlanningEE@highwaysengland.co.uk)

To: Babergh District Council

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@highwaysengland.co.uk](mailto:spatialplanning@highwaysengland.co.uk)

**Council's Reference:** DC/22/00416

Location Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

**Proposal:** Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development.


Referring to the consultation on a planning application dated 2 February 2022 , referenced above, in the vicinity of the A14, that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection (see reasons at Annex A);
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is/is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

 <b>Signature:</b>	<b>Date: 3 February 2022</b>
<b>Name:</b> Mark Norman	<b>Position:</b> Spatial Planner
<b>National Highways</b> Highways England   Woodlands   Manton Lane   Bedford   MK41 7LW	

## **Annex A National Highway's assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The site is some way from the Strategic Road Network, given its scale and location it is unlikely to have a severe impact upon the Strategic Road Network. Suffolk County Council should be consulted as local highway authority

---

<sup>1</sup> Where relevant, further information will be provided within Annex A.

Your Ref: DC/22/00416  
Our Ref: SCC/CON/0418/22  
Date: 21 February 2022  
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: Alex Scott - MSDC

Dear Alex

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/22/00416**

**PROPOSAL:** Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development

**LOCATION:** Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

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

**Traffic Impact:**

1. It is noted that the A140/ B1077 roundabout has been modelled in the 'lane simulation' option in ARCADY. Whilst this provides useful output on the delay on each arm, we require a standard assessment providing the RFC (Ratio of Flow to Capacity) results in order to enable a robust assessment of the impact upon this roundabout.
2. The pass-by/ linked trip assumption of 90% for the PFS/ shop and restaurant is higher than we would anticipate for this type of proposal in this location, being relatively close to settlements with limited shopping and restaurant facilities. Whilst noted the A140/ B1077 movements have not been deducted, the assessment should be at least provide some evidence that this figure is appropriate, or adjust it accordingly so it is comparative to recently permitted similar sites in the region.
3. Whilst it is appreciated that it will be challenging to find comparative sites, the TRICS sites used to forecast trip rates for the employment and restaurant proposals do not provide a suitable number of sites and not at a comparative scale. It would be acceptable to research other local recently permitted similar sites in Suffolk and Norfolk and utilise the agreed trip rates for those.

4. Traffic data collected since March 2020 has generally not been accepted by the Highway Authority. However, in cases where minor variances are not anticipated to prove critical, we have accepted it if comparisons with our own data are acceptable (or adjusted accordingly). In this case, our traffic survey data from across Suffolk shows that Sept 2021 traffic levels were at around 99% of pre-pandemic levels for that month in 2018 and 2019. Therefore, it is considered that when the above requested further assessments are made, the figures are amended slightly to take into account the differences and any unaccounted for background growth to enable a fully robust assessment to be made.

5. Please supply evidence of the assumed rate for lorry park traffic movements.

**Access:**

6. Whilst noted that the proposal benefits from a suitable vehicular access from the highway network, as well as potential to link into the adjacent shared use footway, no details of sustainable travel opportunities to local residential and employment areas have been provided. The restaurant and employment uses are likely to generate demand for sustainable trips from local residential and employment areas and details of how these trips will be accommodated should be provided.

**Holding objection until the above comments (and those from our PROW team - repeated below) have been addressed.**

**SCC PROW team key points:**

**PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

We have the following comments about this proposal:

The development may have an impact on Brome Public Footpath 8 but information submitted does not make this clear.

Brome Public Footpath 8 MUST be plotted on all relevant plans to indicate if it will become obstructed or impacted upon in any way.

If the applicant consider a diversion to Brome Public Footpath 8 is required then they must make contact with the PROW team to discuss.

Yours sincerely,

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

Your Ref: DC/22/00416  
Our Ref: SCC/CON/1028/22  
Date: 31 March 2022  
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: Alex Scott - MSDC

Dear Alex

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/22/00416**

**PROPOSAL:** Application for Outline Planning Permission (All matters reserved) - Erection of petrol and electric charging facility with associated shop; roadside restaurant with drive through facility; E(g) (formerly B1) and B8 starter units; HGV lorry parking facility for rest area and drivers' facilities as a phased development.

**LOCATION:** Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

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

Whilst the recently submitted Technical Note (ref: MA/CC/P21-2411/01TN) responds to the comments in my previous response dated 21/02/22 (ref: SCC/CON/0418/22), it does not address the concern that the proposal will have a significant impact upon the local highway network (by providing additional information to evidence it).

We maintain that the submitted assessment under-estimates the impact on the recently completed A140 roundabout and the proposal does not provide any positive improvements to mitigate this or encourage the use of sustainable travel to the employment and restaurant elements of the proposal.

Whilst we accept that the level of impact and scale of the proposal does not warrant improvement to the roundabout, in order to make the proposal acceptable to the Highway Authority, a Section 106 contribution is required towards pedestrian and cycle improvements between the site location and Eye, in order to encourage sustainable travel to the site and reduce the impact upon the highway network. Further details are provided overleaf.

Public Footpath FP8 is clearly impacted upon by the proposal and if this section of the route is not extinguished (we understand that the section of FP8 in question is subject to an application to be removed from the definitive PROW map - yet to be determined), then a legal order will be required to amend the legal alignment of the route around any proposed obstruction.

## **Recommended Conditions:**

Condition: No part of the development shall be commenced until details of the proposed access layout from the existing roundabout spur have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to first use of the permitted development.

Reason: To ensure that the access is designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

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

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

Condition: Before the development is commenced, details of the areas to be provided for the storage and presentation for collection/emptying of refuse and recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

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

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of the public.

Condition: The lux level of the lighting at ground level at the highway boundary shall not exceed 1 lux.

Reason: In the interests of road safety to prevent uneven light levels on the highway and to prevent light pollution.

Condition: Before the development is commenced details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with the current Suffolk Guidance for Parking where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety.



Condition: Before the development is commenced details of the areas to be provided for the secure, covered and lit cycle storage including electric assisted cycles shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long term maintenance of adequate on-site areas and infrastructure for the storage of cycles and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking 2019.

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

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) Details of deliveries times to the site during construction phase.

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

### **S106 Contribution:**

A Section 106 contribution of £75,000 is required towards pedestrian and cycle improvements between the site location and Eye, in order to encourage sustainable travel to the site and reduce the impact upon the highway network.

We feel that this request is fully in accordance with NPPF paras 57, 110 and 112 and the relevant local policies as detailed below:

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.

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.

In terms of priorities for walking and cycling and promoting sustainable transport modes, the NPPF paragraph 110, specifies that in assessing specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users.

Whilst paragraph 112 specifies that applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

Yours sincerely,

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

Your Ref: DC/22/00416  
Our Ref: SCC/CON/2594/22  
Date: 5 July 2022  
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: Alex Scott - MSDC

Dear Alex

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/22/00416**

**PROPOSAL:** Application for Outline Planning Permission (All matters reserved) - Erection of petrol and electric charging facility with associated shop; roadside restaurant with drive through facility; E(g) (formerly B1) and B8 starter units; HGV lorry parking facility for rest area and drivers' facilities as a phased development

**LOCATION:** Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

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

**The recently submitted Technical Note (ref: MA/CC/P21-2411/02TN) provides comments on some of the issues and requests in our previous response dated 31/03/22 (ref: SCC/CON/1028/22). It does not address the concern that the proposal will have a significant impact upon the local highway network and subsequently, the recommendations (planning conditions and S106 contribution request) from our previous response still apply in order to mitigate this impact.**

Technical Note (ref: MA/CC/P21-2411/02TN) advises that the Highway Authority response is contradictory regarding statements made explaining our position:

*2.1 SCC's response appears to include some contradictory statements:*

*"The proposal will have a significant impact upon the local highway network.."*

*2.2 And then...*

*"... we accept that the level of impact and scale of the proposal does not warrant improvement to the roundabout."*

To clarify, this refers to the level of impact and the position of the Highway Authority that requiring amendments to the recently completed roundabout would be unreasonable, despite the position that it has not been satisfactorily evidenced at any point that the impact of the proposal on the local highway would not be significant.

Technical Note (ref: MA/CC/P21-2411/02TN) challenges the validity of our request for a S106 contribution of £75,000 for pedestrian and cycle improvements as a form of mitigation as follows:

*2.3 SCC go on to seek a S106 contribution of £75,000 towards pedestrian/cyclist improvements. Realistically, we do not see that the proposed development in question will benefit greatly from pedestrian/cyclist improvements between the Site and Eye given that the proposals are primarily for road-side services by virtue of their proximity to the A140.*

*2.4 Overall staffing levels will be low and we should not reasonably expect a significant uptake of walking and cycle between the Site and Eye (even considering the proposed starter business units). That is the reality of the situation at this location as is the case with the existing commercial developments at Eye Airfield, and we do not see that off-site pedestrian/cyclist improvements between the Site and Eye will make any significant difference to how visitors/staff travel to/from the scheme in this case – particularly so given that the fundamentally road-side nature of the scheme.*

*2.5 Therefore, we are not convinced that that SCC's suggested S106 contribution of £75,000 is warranted in this case despite SCC citing various S106 tests. As a minimum, SCC should offer a detailed breakdown of the how the figure of £75,000 was arrived at and provide evidence of how and when this was calculated and who signed this request off. This must not be done retrospectively, and there should be evidence of the figure of £75,000 was calculated prior to the issue of SCC's follow-up letter dated 31st March 2022.*

Sections 2.3 and 2.4 would be accepted if the proposal just included roadside service functions, but it includes mixed use employment units (including uses that can attract significant trips) and restaurant facilities that are likely to be used by residents in the nearest residential areas. Subsequently, we do not agree with the points made in these sections and maintain that such a development should be accessible in accordance with paras. 110 and 112 of the NPPF.

Section 2.5 requests dated evidence of the calculations used to arrive at the £75,000 figure. We are not aware of such a requirement in planning policy and guidance, beyond a contribution needing to meet the relevant tests as set out in para. 57 of the NPPF (that we are confident it does in this case). This is not something that we are able to provide, however we would be happy to set out how the figure was arrived at. We do not keep dated calculation records, nor are we aware of a need to for this type of contribution.

It is noted that information regarding the extinguishment of Footpath 8 (that was previously potentially obstructed by the proposal) has since been provided by SCC Public Rights Of Way team.

Yours sincerely,

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

**From:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 02 Feb 2022 04:49:05

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/22/00416 - OUT

**Attachments:**

---

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

**Sent:** 02 February 2022 16:37

**To:** Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/22/00416 - OUT

Dear Alex,

Thank you for consulting me about the proposed roadside service area off the A140 Ipswich Road in Brome. On reviewing the planning documents, 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/>

-----Original Message-----

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Sent:** 02 February 2022 15:18

**To:** Chris Ward

**Subject:** MSDC Planning Consultation Request - DC/22/00416 - OUT

Please find attached planning consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** Kirsty Nicholls <Kirsty.Nicholls@babberghmidsuffolk.gov.uk>

**Sent:** 17 Feb 2022 06:17:41

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/22/00416 - OUT \*Land Adjacent North Roundabout , A140 Ipswich Road, Brome

**Attachments:** ufm29\_Standard\_Consultation.pdf

---

**From:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>

**Sent:** 17 February 2022 12:12

**To:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Cc:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>; Ken Larcombe <Ken.Larcombe@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/22/00416 - OUT \*Land Adjacent North Roundabout , A140 Ipswich Road, Brome

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/22/00416**

Thank you for your consultation concerning the above application.

The proposed site does contain a public right of way (PROW): Brome Public Footpath 8. The Definitive Map for Brome can be seen at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Brome.pdf> but a more detailed plot of public rights of way must be requested by the Applicant to accurately plot PROW on relevant plans. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.

### **We have the following comments about this proposal:**

- **The development may have an impact on Brome Public Footpath 8 but information submitted does not make this clear.**
- **Brome Public Footpath 8 MUST be plotted on all relevant plans to indicate if it will become obstructed or impacted upon in any way.**
- **If the applicant consider a diversion to Brome Public Footpath 8 is required then they must make contact with the PROW team to discuss.**

### **Furthermore, we ask that the following is taken into account:**

1. **PROW MUST remain open, unobstructed, and safe for the public to use at all times, including throughout any construction period.** If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed (please see points 4 and 5 below).
2. PROW are divided into the following **classifications**:
  - Public Footpath – only for use on foot or with a mobility vehicle
  - Public Bridleway – use as per a public footpath, and on horseback or by bicycle
  - Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage
  - Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the **Definitive Map** and described in the **Definitive Statement** (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk).

3. The applicant, and any future owners, residents etc, must have **private rights to take motorised vehicles over a PROW** other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of

PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

4. **The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW.** It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
  - **To apply for permission to carry out work on a PROW**, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. PLEASE NOTE, that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.
  - **To apply for permission for structures** such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
5. **To apply for permission for a PROW to be stopped up or diverted** within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> PLEASE NOTE, that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
6. Under Section 167 of the Highways Act 1980 any **structural retaining wall** within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
7. Any **hedges adjacent to PROW** must be planted a minimum of 2.0 metres from the edge of the path in order to allow for annual growth. The landowner is responsible for the maintenance of the hedge and hedges must not obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any **fencing** should be positioned a minimum of 0.5 metre from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.
8. **There may be a further requirement to enhance the PROW network relating to this development. If this is the case, a separate response will contain any further information.**

**In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at [www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/](http://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/).**

Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council  
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

-----Original Message-----

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 02 February 2022 15:19

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/22/00416 - OUT \*Land Adjacent North Roundabout , A140 Ipswich Road, Brome

Please find attached planning consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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**From:** Vanessa Pannell <Vanessa.Pannell@baberghmidsuffolk.gov.uk>  
**Sent:** 04 Mar 2022 09:58:31  
**To:**  
**Cc:**  
**Subject:** IDOX-Public - SCC-Public Rights of Way Response - DC/22/00416  
**Attachments:**

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**From:** Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>  
**Sent:** 03 March 2022 12:45  
**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>  
**Subject:** IDOX-Public - SCC-Public Rights of Way Response - DC/22/00416

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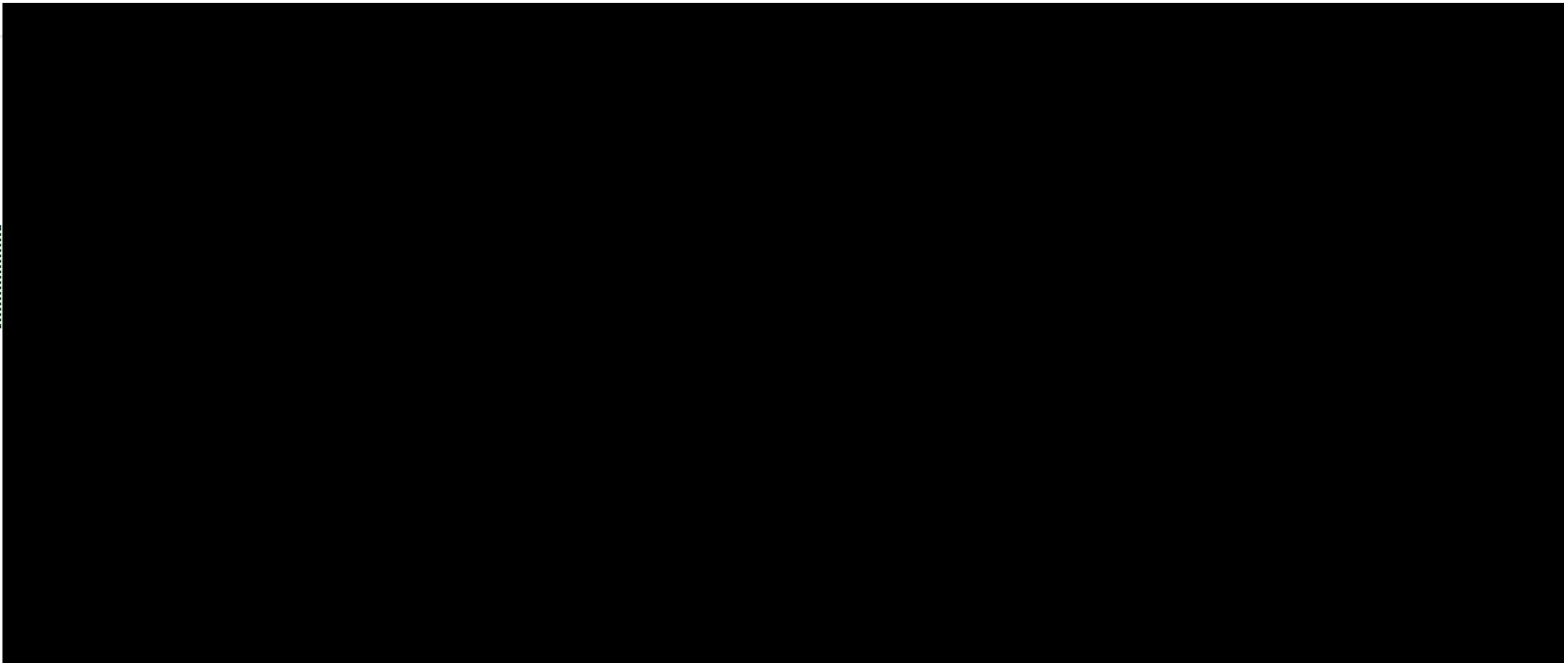
**From:** GHI PROW Planning  
**Sent:** 03 March 2022 12:32  
**To:** Alex Scott  
**Cc:** GHI PROW Planning  
**Subject:** RE: Our ref 2160 re DC/22/00416

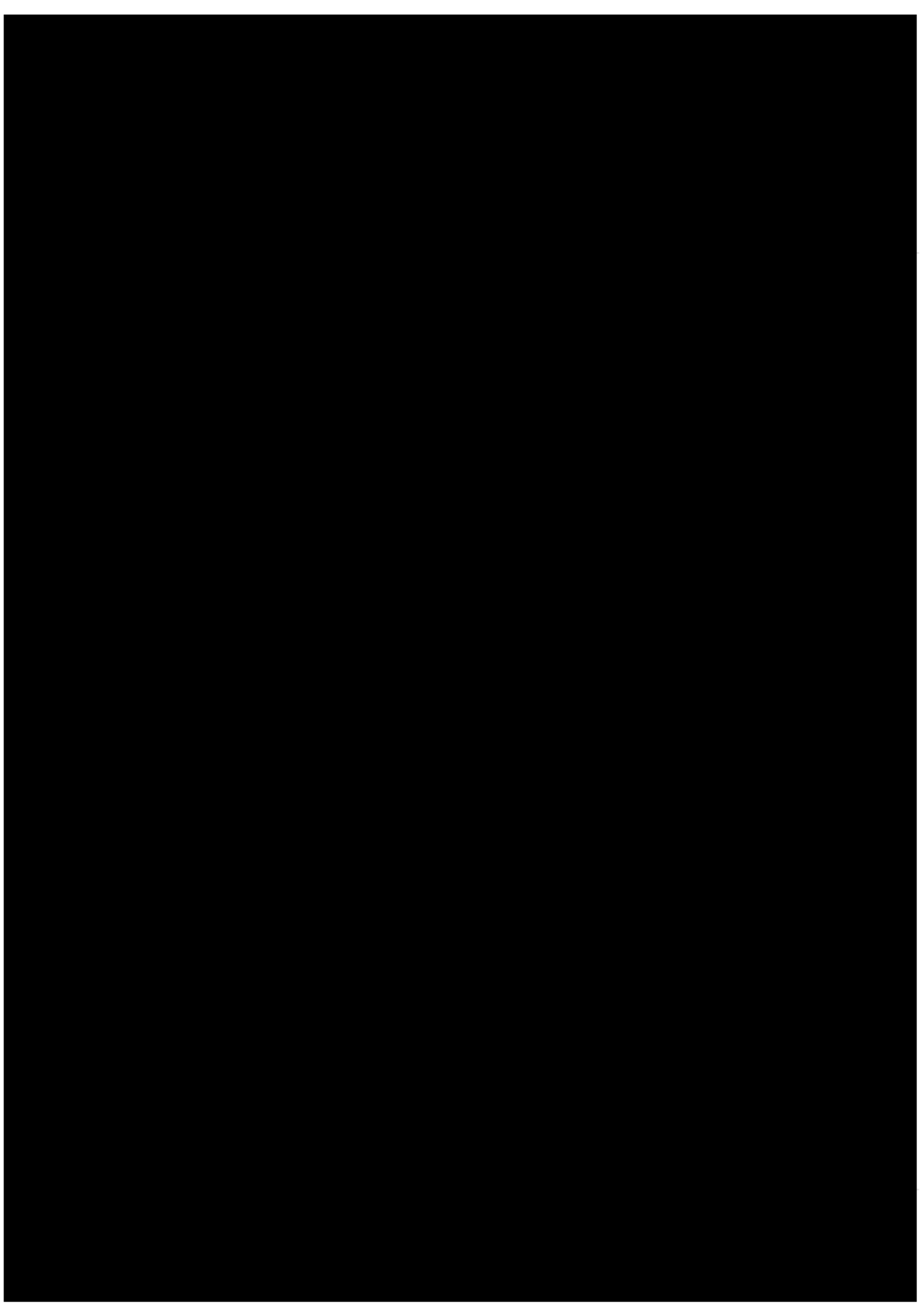
Alex

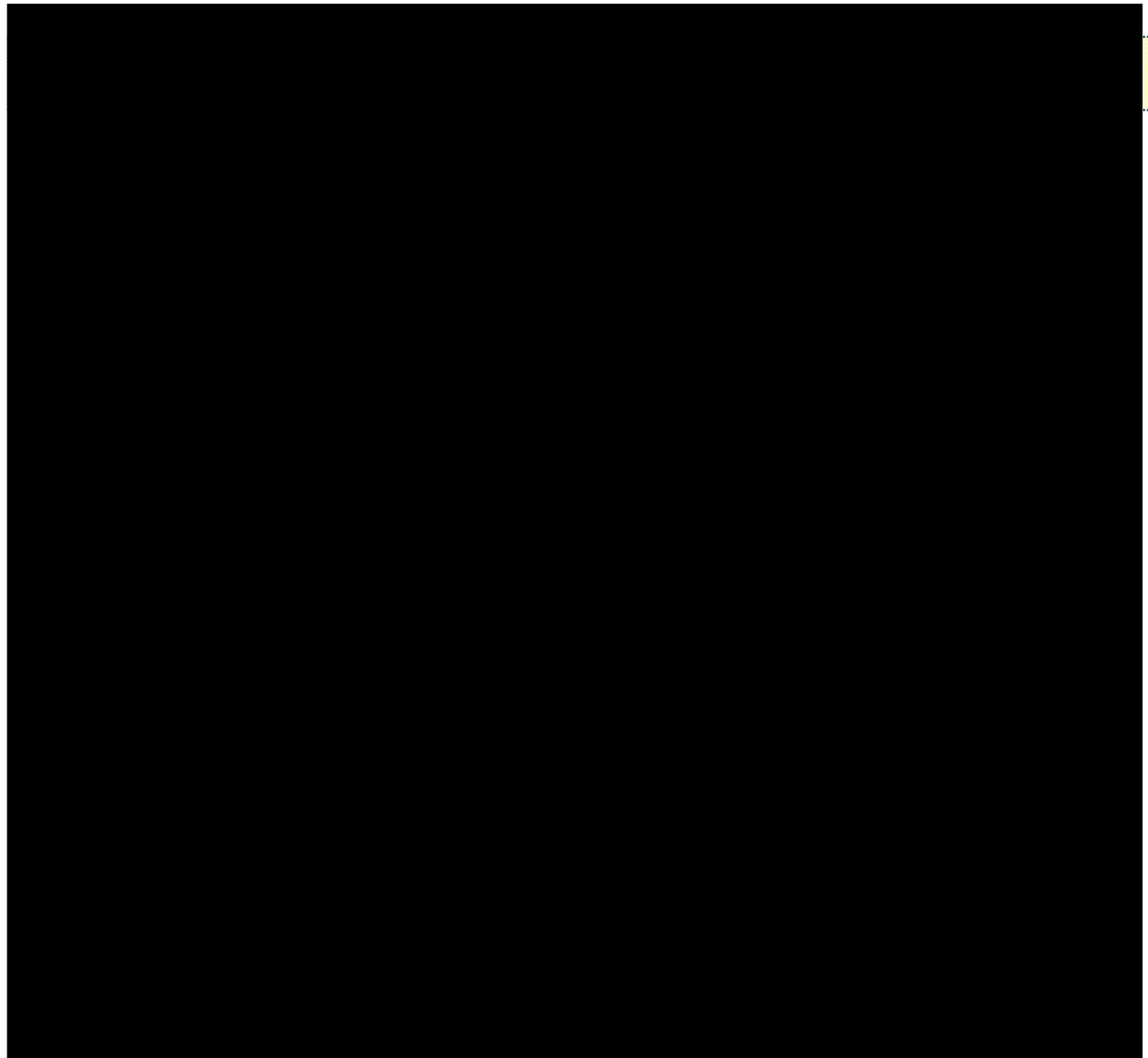
As stated in my email below I have no objection to this application with regard to FP8.

Kind regards

David Falk FRGS  
Green Access Manager  
Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council  
Phoenix House, 3 Goddard Road, Ipswich. IP1 5NP







**From:** GHI Floods Planning

**Sent:** 10 February 2022 13:24

**Subject:** 2022-02-10 JS Reply Land Adjacent North Roundabout , A140 Ipswich Road, Brome IP23 8AW Ref DC/22/00416

Dear Alex Scott,

Subject: Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part in The Parish of Thrandeston IP23 8AW Ref DC/22/00416

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/22/00416.

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

- Proposed Site and Location Plan Ref 2160 3 C
- Phasing Plan Ref 2160 5
- Flood Risk Assessment & Surface Water Drainage Strategy Ref 27665 Rev 0

A holding objection is necessary because the proposed development is within an area at risk of surface water flooding and is therefore contrary to national and local policy/guidance.

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*

There is also insufficient information regarding managing the surface water and pollution management for each phase of the proposed development.

**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 how the proposed development meets the requirement of national and local policy/guidance relating to flood risk.
2. Demonstrate that an attenuation basin incorporating the LLFA design requirements can be met, 1:4 side slopes, 1.5m wet/dry benches every 0.6m depth of water, 300-500mm freeboard and a 3m wide maintenance strip.
3. Resubmit the design calculations demonstrating that discharge rate will not exceed  $Q_{bar}$  for the whole site.
4. Demonstrate that each phase of the proposed development can meet the requirements for pollution control and surface water runoff.
  - a. The surface water from the proposed forecourt area of filling station is to be directed to the public foul water sewer
  - b. The following guidance needs to be incorporated within the proposed development phases [Pollution prevention for businesses - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Note: **further information maybe required.**

Kind Regards

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

**From:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 25 Feb 2022 10:19:16

**To:**

**Cc:**

**Subject:** FW: 2022-02-24 JS reply Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Pt In Parish Of Thrandeston IP23 8AW Ref DC/22/00416

**Attachments:**

---

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

**Sent:** 24 February 2022 14:20

**To:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Cc:** Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>

**Subject:** 2022-02-24 JS reply Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Pt In Parish Of Thrandeston IP23 8AW Ref DC/22/00416

Dear Alex Scott,

Subject: Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part in The Parish of Thrandeston IP23 8AW Ref DC/22/00416

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/22/00416.

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

- Proposed Site and Location Plan Ref 2160 3 C
- Phasing Plan Ref 2160 5
- Flood Risk Assessment & Surface Water Drainage Strategy Ref 27665 Rev 0
- Email from agent dated the 15 Feb 2022

A holding object is necessary because whilst the agents' consultants have alluded to potentially addressing the LLFA comment, no firm evidence has been presented. The LLFA still has concerns regarding the proposal to manage surface water and pollution during each phase of the proposed development.

**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.**

1. See points from previous consultation reply and demonstrate how they will be achieved within the Flood Risk Assessment & Surface Water Drainage Strategy Ref 27665 with evidence.

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highway & Infrastructure

Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

-----Original Message-----

From: [planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk) <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>

Sent: 22 February 2022 10:09

To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

Subject: MSDC Planning Re-consultation Request - DC/22/00416 - OUT

Please find attached planning re-consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

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

**Sent:** 13 April 2022 09:20

**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Cc:** Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

**Subject:** 2022-04-13 WSP Reply Land Adj North Roundabout , A140 Ipswich Rd, Brome, Prt In The Parish Of Thrandeston IP23 8AW Ref DC/22/00416 - OUT

Dear Alex Scott,

Subject: Land Adj North Roundabout , A140 Ipswich Rd, Brome, Prt In The Parish Of Thrandeston IP23 8AW Ref DC/22/00416

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/22/00416.

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

- Plandescil, Flood Risk Assessment & Surface Water Drainage Strategy and appendices (March 2022, Ref 27665 Rev B)
- Hollins, Proposed Site & Location Plan (April 2021, Ref 2160 3D)
- Hollins, Phasing plan (January 2022, Ref 2160 5A)

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority (LPA). The scheme shall be in accordance with the approved FRA and include:
  - a. Dimensioned plans and drawings of the surface water drainage scheme;
  - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
  - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to  $Q_{bar}$  or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
  - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
  - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year rainfall event including climate change, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
  - f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and



volumes of surface water must be included within the modelling of the surface water system;

- g. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.
- h. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
  - i. Temporary drainage systems
  - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
  - iii. Measures for managing any on or offsite flood risk associated with construction

The scheme shall be fully implemented as approved.

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

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

- 2. Within 28 days of practical completion of the last dwelling or unit, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

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

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

Kind Regards

WSP on behalf of LLFA  
Suffolk County Council  
Growth, Highway & Infrastructure  
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

-----Original Message-----

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

Sent: 24 March 2022 11:53

To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

Subject: MSDC Planning Re-consultation Request - DC/22/00416 - OUT

Please find attached planning re-consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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Growth, Highways and Infrastructure  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

Enquiries to: Matthew Baker  
Direct Line: 01284 741329  
Email: [Matthew.Baker@suffolk.gov.uk](mailto:Matthew.Baker@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: CSF 45260  
Date: 9th February 2022

For the Attention of Alex Scott

Dear Mr Isbell

**Planning Application DC/22/00416/OUT – Land Adjacent North Roundabout A140 Ipswich Road, Brome Part In The Parish Of Thrandeston: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER). An archaeological investigation on the roundabout adjacent the proposal identified an early Roman rectilinear enclosure (HER ref no. BRM 134) which extended towards the A140 which follows the line of a Roman road (BRM 011). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

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

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

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment

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

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

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2021).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required, prior to the submission of the reserved matters application, to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

The evaluation should be undertaken once the building on site has been demolished to ground level, but with no grubbing out of foundation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Matthew Baker

Archaeological Officer  
Suffolk County Council Archaeological Service

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/F191086  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 09/02/2022

Dear Sirs,

**LAND ADJACENT NORTH ROUNDBOUT A140, IPSWICH RD,EYE,IP23 8AW**

**Planning Application No: DC/22/00416**

**A CONDITION IS REQUIRED FOR FIRE HYDRANTS**

**(see our required conditions)**

I refer to the above application.

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

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 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**

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

/continued

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

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

**Sprinklers Advised**

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

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

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appointed 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

Enc: Hydrant requirement letter

Copy: [all@hollins.co.uk](mailto:all@hollins.co.uk)

Enc: Sprinkler information

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: ENG/AK  
Enquiries to: Water Officer  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 09 February 2022

**Planning Ref: DC/22/00416**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING  
ADDRESS:  
DESCRIPTION:  
HYDRANTS REQUIRED**

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

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

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

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

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

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

Continued/

OFFICIAL

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

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

OFFICIAL



Created: September 2015

Enquiries to: Fire Business Support Team  
Tel: 01473 260588  
Email: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)



Dear Sir/Madam

## **Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development**

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

### **Dispelling the Myths of Automatic Fire Sprinklers**

- Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.
- Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.
- An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.
- Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

### **Promoting the Benefits of Automatic Fire Sprinklers**

- They detect a fire in its incipient stage – this will potentially save lives in your premises.
- Sprinklers will control if not extinguish a fire reducing building damage.
- Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.
- They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.
- They may reduce insurance premiums.
- Automatic fire sprinklers enhance Firefighter safety.

## OFFICIAL

- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

### **The Next Step**

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully

Chief Fire Officer

Suffolk Fire and Rescue Service

Your ref: DC/22/00416/OUT  
Our ref: Brome, Thrandeston, land adjoining  
north roundabout, A140 Ipswich Road, IP23  
8AW - 60227  
Date: 08 February 2022  
Enquiries: Anik Bennett  
Tel: 01473 264152  
Email: [anik.bennett@suffolk.gov.uk](mailto:anik.bennett@suffolk.gov.uk)



Alex Scott  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

e-mail:  
[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)  
[alex.scott@baberghmidsuffolk.gov.uk](mailto:alex.scott@baberghmidsuffolk.gov.uk)

Dear Alex,

**Brome: Land Adjacent North Roundabout, A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW - developer contributions**

I refer to the proposal: Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development.

The County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

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.*

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.

## Community Infrastructure Levy

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

New CIL Regulations were laid before Parliament on 04 June 2019. These Regulations may be cited as the Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 and came into force on 01 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

The County, Borough and District Councils in Suffolk have a shared approach to calculating infrastructure needs, in the adopted Section 106 Developers Guide to Infrastructure Contributions in Suffolk.

The details of specific contribution requirements related to the proposed scheme are set out below.

### 1. 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 a 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.

In terms of priorities for walking and cycling and promoting sustainable transport modes, the NPPF paragraph 110, specifies that in assessing specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*

Whilst paragraph 112 specifies that applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

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. The latest update of the guidance can be viewed at <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

**2. 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*
- e) 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 formal response will be provided to the LPA by Suffolk County Council's Flood and Water Management team.

- 3. Archaeology:** Any specific archaeological requirements will be provided to the LPA from the Suffolk County Council Archaeological Service.
- 4. 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].
- 5. 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.
- 6. 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.
- 7. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A, whether or not the matter proceeds to completion.
- 8. Monitoring fee.** The CIL Regulations (2019 as amended) 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.
- 9. Time Limits.** The above information is time-limited for 6 months only from the date of this letter.

Yours sincerely,

Anik Bennett  
Senior Planning and Infrastructure Officer  
Growth, Highways & Infrastructure Directorate

cc Floods Planning, Suffolk County Council  
Ben Chester, Suffolk County Council (Transport)  
Suffolk County Council (Archaeological Service)

# Consultee Comments for Planning Application DC/22/00416

## Application Summary

Application Number: DC/22/00416

Address: Land Adjacent North Roundabout A140 Ipswich Road Brome Part In The Parish Of Thrandeston IP23 8AW

Proposal: Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development.

Case Officer: Alex Scott

## Consultee Details

Name: Mr Thomas Pinner

Address: BMSDC, Endeavour House, Ipswich IP1 2BX

Email: Not Available

On Behalf Of: Heritage Team

## Comments

Dear Alex,

DC/22/00416

03/02/2022

The Heritage Team does not intend to provide comments on the above application.

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)

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





09 March 2022

Alex Scott  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

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*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/22/00416  
**Location:** Land Adjacent North Roundabout A140 Ipswich Road Brome Part In The Parish Of Thrandeston IP23 8AW  
**Proposal:** Application for Outline Planning Permission (All matters reserved) - Erection of petrol and electric charging facility with associated shop; roadside restaurant with drive through facility; E(g) (formerly B1) and B8 starter units; HGV lorry parking facility for rest area and drivers' facilities as a phased development.

Dear Alex,

Thank you for consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancement measures.**

**Summary**

We have assessed the Preliminary Ecological Appraisal (Liz Lord Ecology Ltd, February 2022), as well as the further ecological information, submitted by the applicant, relating to the likely impacts of development on designated sites, protected and Priority species & habitats.

Furthermore, we have reviewed the comments provided by Natural England (February 2022, Ref: 382808), indicating that the proposals have triggered the Impact Risk Zone of Gypsy Camp Meadows, Thrandeston Site of Special Scientific Interest (SSSI)

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.



Therefore, the mitigation measures identified Preliminary Ecological Appraisal (Liz Lord Ecology Ltd, February 2022), should still be secured and implemented in full. This is necessary to conserve protected and Priority Species.

In addition, it is highlighted that we do not consider that adverse impacts will be caused on any of the lowland meadows associated with the Gypsy Camp Meadows, Thrandeston SSSI. This is because we agree that the proposed development does not contain any impact pathways to this site via local topography or drainage. In addition, the proposed surface water lagoon will be situated over 2km from the designated site. As a result, we are satisfied the proposals will not affect the favourable conservation status of this statutory designated site and that no additional measures are required.

Furthermore, we recommend that the reasonable biodiversity enhancements should be implemented into the finalised design to secure measurable net gains for biodiversity, as outlined under Paragraph 174[d] of the National Planning Policy Framework 2021. The reasonable biodiversity enhancement measures outlined within the Ecological Impact Assessment should be implemented via 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 the Preliminary Ecological Appraisal (Liz Lord Ecology Ltd, February 2022) 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 ANY WORKS ABOVE 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.*

*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 NPPF 2021 and s40 of the NERC Act 2006 (Priority habitats & species), as updated by the Environmental Act 2021.

Please contact us with any further 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.

**From:** Kirsty Nicholls <Kirsty.Nicholls@babberghmidsuffolk.gov.uk>

**Sent:** 23 Mar 2022 12:43:01

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Re-consultation Request - DC/22/00416 - OUT

**Attachments:**

---

**From:** Hamish Jackson - Ecological Consultant <Hamish.Jackson@essex.gov.uk>

**Sent:** 22 March 2022 15:40

**To:** Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Re-consultation Request - DC/22/00416 - OUT



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Good afternoon Alex,

The ecological comments provided on the 9th March 2022 for this application have considered the revised drawings provided on the 25th February 2022. In addition, I have no further comments to make on the submitted 'Additional Highways Information'.

As a result, I am satisfied that no further formal consultation response should be required for this scheme, as all relevant information has been considered in the initial comments.

Let me know if you have any additional queries.

Kind regards,

Hamish

**Hamish Jackson** ACIEEM BSc (Hons)  
**Ecological Consultant** at Place Services

telephone: 03330 320980 mobile: 07740901139

email: [hamish.jackson@essex.gov.uk](mailto:hamish.jackson@essex.gov.uk) / [PlaceServicesEcology@essex.gov.uk](mailto:PlaceServicesEcology@essex.gov.uk)

web: [www.placeservices.co.uk](http://www.placeservices.co.uk)

linkedin: [www.Linkedin.com/in/hamishjackson/](http://www.Linkedin.com/in/hamishjackson/)

Pronouns: He / Him



-----Original Message-----

**From:** [planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk) <[planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk)>

**Sent:** 25 February 2022 15:16

**To:** Place Services Ecology <[PlaceServicesEcology@essex.gov.uk](mailto:PlaceServicesEcology@essex.gov.uk)>

**Subject:** MSDC Planning Re-consultation Request - DC/22/00416 - OUT

CAUTION: This is an external email.

Please find attached planning re-consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

**From:** Nathan Pittam  
**Sent:** 15 February 2022 10:28  
**Subject:** 303174 DC/22/00416. Land Contamination

**EP Reference : 303174  
DC/22/00416. Land Contamination  
Land Adjacent North Roundabout, Ipswich Road, EYE, Suffolk.  
Application for Outline Planning Permission. (All matters reserved) Erection of  
petrol ...**

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/>.

For the purposes of clarity these comments **only** relate to matters of Land Contamination.

Regards

Nathan

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

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

Email: [Nathan.pittam@babberghmidsuffolk.gov.uk](mailto:Nathan.pittam@babberghmidsuffolk.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; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

**From:** Kirsty Nicholls <Kirsty.Nicholls@baberghmidsuffolk.gov.uk>

**Sent:** 09 Feb 2022 03:37:37

**To:**

**Cc:**

**Subject:** FW: DC/22/00416 - Air Quality

**Attachments:**

---

**From:** Jennifer Lockington <Jennifer.Lockington@baberghmidsuffolk.gov.uk>

**Sent:** 09 February 2022 15:03

**To:** Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

**Subject:** DC/22/00416 - Air Quality

Dear Alex

YOUR REF: 22/00416

OUR REF: 303173

**SUBJECT:** Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development.

Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

**Please find below my comments regarding air quality matters only.**

Thank you for your consultation on the above application.

I have no objections with regard to air quality. I would though recommend the applicant contacts the Environmental Protection Team to discuss applying for an Environmental Permit for the petrol filling station. Contact details are [environmental@baberghmidsuffolk.gov.uk](mailto:environmental@baberghmidsuffolk.gov.uk) or 0300 123 4000.

Regards

**Jennifer Lockington (Mrs)**

Senior Environmental Management Officer

**Babergh & Mid Suffolk District Councils - Working Together**

tel: 01449 724706

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

Please note - I work Tuesdays and Wednesdays



**From:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 24 Feb 2022 10:58:24

**To:**

**Cc:**

**Subject:** FW: DC/22/00416

**Attachments:**

---

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

**Sent:** 23 February 2022 17:13

**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Subject:** DC/22/00416

Dear Alex,

## **APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/22/00416**

**Proposal:** Application for Outline Planning Permission. (All matters reserved) Erection of petrol and electric charging facility with associated shop, roadside restaurant with drive through facility, B1 and B8 starter units, HGV lorry parking facility for rest area and drivers' facilities as a phased development.

**Location:** Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish of Thrandeston IP23 8AW.

Many thanks for your request to comment on the application.

Upon review of the application 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 must include as a minimum to achieve:-

- Agreement of provisions to ensure the development is zero carbon ready
- Agreement of heating for the conditioned areas
- Agreement of scheme for waste reduction

The scheme shall include a clear timetable for the implementation of the measures in relation to the first occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed and thereafter maintained.

**REASON:** To enhance the sustainability of the development through better use of water, energy and resources reduce harm to the environment and result in wider public benefit in accordance with the NPPF.

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@baberghmidsuffolk.gov.uk](mailto:simon.davison@baberghmidsuffolk.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 Blue <planningblue@babberghmidsuffolk.gov.uk>

**Sent:** 28 Mar 2022 09:45:09

**To:**

**Cc:**

**Subject:** FW: WK304969 DC2200416

**Attachments:**

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

**Sent:** 25 March 2022 09:51

**To:** Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

**Subject:** WK304969 DC2200416

Environmental Health -  
Noise/Odour/Light/Smoke

**APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/22/00416**

**Proposal:** Application for Outline Planning Permission (All matters reserved) - Erection of petrol and electric charging facility with associated shop; roadside restaurant with drive through facility; E(g) (formerly B1) and B8 starter units; HGV lorry parking facility for rest area and drivers' facilities as a phased development.

**Location:** Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

We recently sent you a consultation in respect of the above application. We have received further Information

Thank you for re consulting me on this application. Following my previous questions e-mailed to you on 7/2/22, added below this reply for context,

I note the response from the consultant added to the planning documents on line, dated 16 March 2022. A significant comment from the consultants reply is added here:

[the submitted report has only provided indicative mitigation measures for outline planning. It is recommended that, following approval, a detailed assessment of development activities should be carried out; whereby it may be necessary to consider additional mitigation measures, such as: taller close-to-source screening/variations to site layout/selection of quieter plant and equipment/and noise management plans to minimise the potential for noise impact.](#)

**Noise**

Based on this response, I have no objections in principle to this application. However, I ask that it is conditioned that prior to any full planning consent being granted, a full detailed acoustic assessment is carried out by a suitably qualified person to consider the development activities in line with the consultants response above. I recommend the following condition

**Requirement for Noise Assessment**

The application shall not be determined until full details of all plant to be installed including precise acoustic specification, as well as a noise assessment, to include details of the current existing background level, proposed site use, vehicle movement activities (to include refrigeration units on vehicles/trailers parked on site as part of the developments proposed use), to be based on methodology as given in British Standard BS4142:2014 (Methods for rating and assessing industrial and commercial sound) and/or its subsequent amendments have been submitted to an approved by the LPA, in order to allow the likelihood of loss of amenity to be determined.

Note: Noise management plans and any mitigation methods proposed shall be submitted for assessment and approval as part of this assessment.

*Reason: to minimise detriment to nearby residential amenity*

## Lights

Prior to the commencement of development, a written scheme shall be submitted to and agreed in writing by the local planning authority that specifies the provisions to be made for the level of illumination of the site and to control light pollution. The scheme shall be implemented prior to beneficial use of the approved development and maintained for the lifetime of the approved development and shall not be altered without the prior written approval of the local planning authority. The scheme shall demonstrate that all lighting of the development (including resultant sky glow, light trespass, source intensity and building luminance) fully complies with the figures for the (^Insert EZ1/EZ2/EZ3/EZ4) environmental zone and advice specified in the Institution of Lighting Professionals Guidance Note for the reduction of obtrusive light 2011. The submitted scheme shall include a polar luminance diagram (based on the vertical plane and marked with ^INSERT lux contour lines).

*Reason: to minimise detriment to nearby residential amenity*

I would also ask that the following conditions are added

## Construction

### 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:

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.

Q sent on 7.2.22:

Having reviewed the Noise Impact Assessment Technical Report 37079- R1 dated 18/10/2021 I have a couple of questions that I would like you to raise with the consultant please:

Looking at section 4.3 on page 12, as below:

4.3 Based on the proposed scheme, illustrated in Figure C1 in Appendix C, a number of associated potential noise-generating sources have been identified, these have been noted to include:

- ☑ Proposed Lorry Park:
  - o Lorry movements
  - o Fixed plant associated with "Drivers Rest Facilities"
- ☑ 24 no. B1 and B8 "Starter Units"
  - o Commercial activity of an industrial nature
  - o Potential loading/unloading activity
  - o Forklift operations (movements, reverse sirens, etc.)
  - o Fixed plant and machinery
  - o Vehicles parking
- ☑ Fuel Pump Forecourt and Restaurant
  - o Fixed plant and machinery
  - o Vehicles parking
  - o Drive-thru speakers

Lorry movements and fixed plant has been raised as a potential noise source. I can also see in section 4.22 that mention is made to sound emitting sources at relatively high levels from HGV's.

I am concerned that the lorry park may be used overnight whilst drivers undertake their rest periods with either diesel powered refrigeration or freezer plant units running overnight. As can be seen from the screen grab below from Google Earth due to the height of these units the existing fencing around the adjacent site may not afford significant attenuation.



4.22 in the report advises that a 2-4m impermeate screen is used around the lorry park. Can I ask if the levels from any plant at worst case scenario of all the bays used by refrigerated units has been taken into account as part of the assessment.

*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 Blue <planningblue@baberghmidsuffolk.gov.uk>

**Sent:** 04 Feb 2022 10:24:36

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/22/00416 - OUT

**Attachments:**

---

**From:** Jenny Bradin

**Sent:** 03 February 2022 19:51

**To:** BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/22/00416 - OUT



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We have no objection to this planning application as construction of new footpaths has already been provided.

Kind regards.

Jenny Bradin

Ramblers Bury Group Footpath Secretary Patch 1A

Sent from [Mail](#) for Windows

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**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)

**Sent:** 02 February 2022 15:18

**Subject:** MSDC Planning Consultation Request - DC/22/00416 - OUT

Please find attached planning consultation request letter relating to planning application - DC/22/00416 - Land Adjacent North Roundabout , A140 Ipswich Road, Brome, Part In The Parish Of Thrandeston IP23 8AW

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

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