

PARISH COUNCIL
Comments from: Elmswell Parish Council

Planning Officer: James Platt
Application Number: 4909/16

Proposal: Reconsultation due to revised site location plan and revised highway details
 Outline Planning Permission sought for the erection of 38 dwellings
 with vehicular and pedestrian access.

Location: Land east of Warren Lane and west of Cresmedow Way, Elmswell

Councillors register strong and unanimous objection to this proposal for the following reasons:

- The likely CIL yield will not adequately support the provision of education facilities commensurate with the strain imposed by the cumulative effect of this Proposal in tandem, as presented at 1.5 in the Applicant's Planning Statement re the parallel application ref 4911/16, for 240 dwellings on land at Wetherden Road. The current school site at Oxer Close will, as per SCC projections table below, be at capacity in 2019/20 which is prior to these applications, if successful, being built.

		Forecast peak age group sizes				
	PAN	2016/17	2017/18	2018/19	2019/20	2020/21
315	45	263	281	297	319	334

Housing developments wholly or partly within the school catchment area

Application Reference	Location	Total Units	Estimated Housing Completions				
			2016	2017	2018	2019	2020
0846/13	St Edmunds Drive Former Grampian Foods (Harris Bacon) Site	190	0	65	65	60	0
Totals		190	0	65	65	60	0

Aggregated estimates of pupils from new housing developments	0	16	32	47	47
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	Proposed Housing	Primary Pupil Yield
Wetherden Road	240	59
Warren Lane	38	10
Ashfield Road	140	35
Borley Crescent	60	15
School Road	87	22
	565	141

The pupil yield forecast for other pending developments, properly identified by SCC, clearly points up the need for a strategic review of primary school provision in Elmswell which is not reflected in this Application. For this reason, the application is not for a sustainable development and the NPPF presumption in favour falls. Structure Plan Policy SC1 becomes the valid reference point and asserts that; ***Where proposals for development cannot be adequately serviced or will overburden existing infrastructure, the district Planning Authority will not grant Planning Permission until these matters are resolved.***

Furthermore, suggestions for quick-fix shoehorning-in of facilities such as all-weather surfacing to replace the school playing field are, on this site already constricted by the recent imposition of the 2 older year groups, not acceptable to Elmswell residents who do not expect to have to tolerate an overcrowded and urban environment for their children. A longer term view is essential and applications such as this must await such a review.

2

The figures presented in the Transport Assessment appended to this Application regarding Existing Traffic Conditions, Trip Generation & Distribution rely on studies which are out of date, fail to adequately allow for anticipated traffic growth, ignore available information on traffic growth within the village and woefully under-estimated the anticipated additional volumes of traffic which would be generated by the developments, both through Elmswell and Wetherden / Haughley New Street. There are inevitable and decisively severe impacts on junction capacity within Elmswell and an unacceptable extra through-traffic loading on the satellite villages.

The Applicants have based their anticipated trip-rates-per-property at 6.1 on a study carried out for the Harris Bacon Factory development in Elmswell which surveyed peak time trip rates from Elmswell's Blackbourne estate and were used here as unaltered percentages to estimate the potential trips from the proposed Wetherden Road development. No allowance has been made for increase in traffic volumes since the Harris study which was conducted in April 2008. This coincided with the height of the financial crisis which, field professionals accept, led to a reduction in household journeys at that time. Neither has any allowance been made for year-on year 'trip inflation'. Given that this application seeks to project to 2021, the figures used are at least 13 years out of date.

Additionally, the Assessment carried out a single day's traffic survey of movements along Wetherden Road and its continuation into Church Road. The date of the survey, July 13th, lay within the school summer holiday break when traffic flows are accepted, by professional practitioners, as unrepresentative. At the Cross St crossroads, counts of 390 and 395 two-way movements were recorded in the morning and evening peak hours respectively. This, compares to statistics recorded at the same point in a 2012 in a week-long ATC survey carried out for the Bacon Factory application which had corresponding figures of 286 and 328 peak hour movements. There has, therefore, been an increase of some 20% - 35% in 4 years. Councillors argue that it would be appropriate to apply this rate of increase since the 2012 Blackbourne Road study in assessing relevant growth statistics in this instance. Consequently, the additional traffic volumes included in the Transport Assessment of approximately 190 two-way trips in both morning and evening peak periods should be increased by between 80% and 100% to give an accurate assessment of the impact on Wetherden Road, Church Road and their associated junctions. Whilst it would appear that the Cross Street junction would remain within accepted capacity limits, even allowing for the higher volumes of traffic, it is unlikely that the Church Road / School Road junction would remain within the 0.85 RFC safe capacity threshold at peak morning times. The PICADY assessment carried out by the Applicant's agent (Transport assessment table 8.5), taking account of their proposed traffic flows, identifies a.m. junction capacity as reaching 0.795. This compares with the PICADY assessment produced for the Bacon Factory application in 2012 which

assessed capacity at this junction at 0.66. This is a considerable increase in the 4 years between the 2 studies and, if the higher rate of vehicle movements identified earlier occurs, the safe threshold of 0.85% of full capacity will be breached, and dangerously so, during the crucial peak morning period. In all of the foregoing, it should be remembered that this Application is contiguous with that at Wetherden Road, ref. 4911/16 for up to 240 dwellings and the traffic effects of both proposed developments should be aggregated in any fair assessment of the increased stress on the road network.

The recent Mid Suffolk SHLAA identified these issues in its assessment of the sites ELM04 / ELM08 where, '**highways access...is an issue.**' In the case of Warren Lane specifically, from the Applicant's own figures in the Transport Statement, the width of as little as 3.47m to the south of the proposed road junction with the new housing estate is patently hazardous and unworkable.

This same factor, of a narrow carriageway which allows only one-way passage, is true of 3 points to the north of Warren Close where there are no proposals for mitigation of this hazard, despite the increased traffic flow given that a high Similarly, the proposals for addressing the problems which this proposal creates at the Warren Lane / New Road, Church Road / Cross Street junction in no way suggest a safe solution. The junction is off-set in the north/south traffic line. This is a major contributory factor in the 3 recorded incidents of RTA so far in 2017. 2 of these incidents required ambulance attendance. Again, the Applicant's submission, in this case a plan showing one incident at this point, is ill informed and misleading. Further SCC Highways feedback is essential if these shortcomings in the case presentation are to be addressed.

The above gives good reason to doubt the basic assumptions which underpin a suggestion that this is a sustainable Proposal and, accordingly, removes the right to rely on NPPF as the governing principle in reaching a decision on viability. The default Structure Plan policy T10 clearly requires that the Authority will have regard to, **the suitability of existing roads giving access to the development, in terms of the safe and free flow of traffic and pedestrian safety.** This proposal is clearly in breach and should be rejected.

Elmswell Parish Council has itself commissioned a traffic survey in the village from Messrs Waterman Infrastructure & Environment Ltd. The results will be available on or before 31.05.17. SCC Highways are aware of this initiative and have had a part in the selection of the practice concerned and in defining the research parameters. No further progress of this application should be countenanced prior to the publication of this independent assessment.

- 3 The likely CIL yield will not adequately support the requirements that this Proposal, if successful, creates for enhanced provision at the Woolpit Health Centre where doctors are attracting wide Press coverage of the difficulties they face on the current site. The cumulative effect of this Proposal in tandem, as presented at 1.5 in the Applicant's Planning Statement, with the separate application for 38 dwellings on land at Warren Lane, presents the Practice with the need to provide for 280 new households in along with multiple other Permissions pending and with similar loadings from other communities in the catchment. This clearly renders the Proposal unsustainable and, therefore, beyond the purview of the NPPF. The Local Plan, which, therefore, prevails, has it at 2.9.3 that **the Services and Community Facilities objectives...are...to ensure that adequate services are available to meet the needs of new development.** This proposal runs counter to this stricture and should be rejected for that reason.

- 4 The applicant has submitted a late Supplement by way of a Sustainability Assessment. The size and nature of this Application, particularly when it is, properly, aggregated with the tandem Application ref. 4909/16, is such that a basic compliance with the relevant Building Regulations is not adequate. In order to meet acceptable standards in this regard, basic design factors will have to be brought into play and this should not be a retro-fitting exercise bolted on to the permission sought to simply establish the principle of domestic dwellings on these sites. For this reason, Councillors would want to see deferral until issues of sustainability are addressed for the avoidance of doubt at the later detailed Planning stage.

Support

Object



No Comment

Signed



on behalf of the Elmswell Parish Council

05.05.17

Planning Application 4909/16

Development of up to 38 dwellings with associated vehicular and pedestrian access.

Land east of Warren Lane and west of Cresmedow Way, Elmswell.

Response of Wetherden Parish Council

We wish to register our concern that no formal consideration has been taken as to the impact this development will have on its nearest neighbouring parish. Indeed only at a recent meeting was this recognised by MSDC, and SCC Highways.

Wetherden is a village of some 245 dwellings. If taken with the twin site under 4911/16 the total number of dwellings will exceed those of Wetherden by 14% (279 vs 245). Yet despite this the developer has not proposed how the traffic emanating from the site will be managed, both in volume and safety terms. In meetings and conversations with them, we get the impression that what was discussed with them has not been taken into account in plan changes. The significant and negative effect this will have on Wetherden's residents has in effect not been taken into account by the developer, MSDC or SCC Highways.

Wetherden Parish Council objects strongly to the planning application on the following grounds:

Infrastructure

Councillors are concerned that the current infrastructure as it applies to Wetherden, is already insufficient to cope well with the demands placed on it. This new development, let alone the others being built and planned for Elmswell, will, unless suitably enlarged, overwhelm them. Our children go to Elmswell School currently running almost to capacity, insufficient trains actually stop at Elmswell Station, it is impossible to register with an NHS dentist, and West Suffolk Hospital is similarly already slow in appointments, and struggling in A & E. Only as far as Woolpit Health Centre is concerned are we aware that expansion plans for the benefit of patients are being considered. The Council notes that the applicant's plans show a school in Wetherden. This is not the case as the pre-school closed in 2014.

We have seen nothing from MSDC nor SCC, regarding what they intend to do to resolve these public pinchpoints.

Traffic

The *increase* in traffic volume through Wetherden will be highly significant and we have severe concerns with the current proposal for the safety of residents, levels of

pollution, road maintenance and impact on listed buildings. Endurance Estates estimates that 36% of the increased traffic movement will come through our village. This reflects a 30% increase in traffic movements. However, the actual figure for traffic volume is likely to be much higher based on evidence from Elmswell PC evidencing that the data used in the applicant's calculations are at least 13 years out of date and do not sufficiently take into account year on year 'trip inflation'. As cars are continually parked on the Elmswell Road in Wetherden (leading in from Elmswell) and others, the traffic is effectively running on single track roads. Moving this volume of traffic through single track, village roads is not realistic and we strongly question the capacity of the roads to deal with this.

Houses which have access on to these roads have limited visibility so the difficulty and danger of negotiating turning into and exiting from these driveways will be exacerbated by extra traffic movements.

Conclusion

Wetherden Parish Council **OBJECTS** to the above planning application on the grounds of increased traffic, the lack of any proposals to overcome this, and related hazards, lack of infrastructure. We ask that the developers take into consideration the concerns of neighbouring villages and the impact these developments will have on them. Equally we wish to learn from the relevant authority (SCC, MSDC, NHS) how they plan to provide the relevant levels of public services as laid down by rules, for our residents.

Wetherden will suffer from a decreased quality of life from these developments, but will gain no benefits.

Jen Larner
Clerk

on behalf of Wetherden Parish Council

26 January 2017

Your Ref: MS/4909/16
Our Ref: 570\CON\1429\17
Date: 21st April 2017
Highways Enquiries to: martin.egan@suffolk.gov.uk



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

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

Dear Sir,

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4909/16

PROPOSAL: Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access.

LOCATION: Land East Of, Warren Lane, Elmswell

ROAD CLASS:

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

1

Condition: Before any other development commences the junction of Warren Lane with Church Road/Cross Street shall be improved generally in accordance with Drawing Number S761/235 as submitted.

Reason: To improve the visibility at the junction for development traffic for an improvement in road safety.

2

Condition: Before any dwelling is first occupied passing places shall be provided on Warren Lane to the south of the application site in the locations generally shown on Drawing Number S761/246/A as submitted. The passing places shall be constructed in accordance with details that shall first have been submitted to and approved in writing by the LPA.

Reason: To widen Warren Lane in places to allow vehicles to pass safely.

3

Condition: Before any new dwelling is first occupied Warren Lane shall be improved as shown on Drawing Number S761/240/A as submitted.

Reason: In order to provide a suitable and safe access to the site for vehicles and pedestrians.

4 ER 1

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

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

5 ER 2

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

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

6 P 2

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

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

7 V 1

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. S761/240/A as submitted and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action.

8 NOTE 02

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. The County Council's Central Area Manager must be contacted on Telephone: 01473 341414. Further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

9 NOTE 07

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

10 NOTE 12

The existing street lighting system may be affected by this proposal. The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer.

11 NOTE 15

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

12 NOTE 09

Suffolk County Council's highway apparatus appears to be affected by this proposal. The applicant must contact the Central Area Manager, telephone 01473 341414, to agree any necessary alterations to be carried out at the expense of the developer. Those that appear to be affected are speed limit signs within the site frontage.

13

SECTION 106 AGREEMENT REQUEST

Public Rights of Way are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism. The anticipated increased use of the PROW network of as a result of the development will require the following offsite improvement works:

The developer has indicated a permissive footpath route connecting the two developments, we require that this route becomes a legally recorded public footpath by means of a Creation Agreement. A financial contribution will therefore be required:

Landowner compensation costs £2,137.50
Staff time (design & project management) @ 12% = £256.50
Contingency @ 10% = £213.75
Order making costs = £4,000.00

Total s106 funding requested from this development = £6,607.75

National Planning Policy Framework

The following sections of the NPPF bear relevance to Public Rights of Way:

Section 3 - Supporting a prosperous rural economy

Para 28 - To promote a strong rural economy, local and neighbourhood plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.

Section 4 - Promoting sustainable transport

Para 35 - refers to priority given to pedestrian and cycle movements, creating safe and secure routes to minimise conflicts between traffic and cyclists or pedestrians and to consider the needs of people with disabilities by all modes of transport.

Section 8 - Promoting healthy communities

Para 69 - Planning policies and decisions, in turn, should aim to achieve places which promote safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

Para 73 - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.

Para 75 - Planning policies should protect and enhance public rights of way and local authorities should seek opportunities to provide better facilities for users, for example by adding links to the rights of way network.

Suffolk County Council Strategies and Policies:

- The Rights of Way Improvement Plan which, inter alia, highlights the importance of development in rural areas should give people the greatest opportunity to access the countryside by walking and cycling,
- The Walking Strategy, which seeks to ensure existing communities with a population over 500, and new developments over 10 dwellings have easy access to a one mile natural walk or 2ha of green space, within 500m of their home,
- The Cycling Strategy, which seeks to promote a transfer to cycling (and walking) for short distance trips, plan and design for the future with cycling in mind and create a safe and cycle friendly environment,
- The Joint Health and Wellbeing Strategy for Suffolk, outcome 2 of which states Suffolk residents should have access to a healthy environment and take responsibility for the own health and wellbeing,
- The Nature Strategy which seeks to ensure physical access improvements go hand-in-hand with wildlife sensitivity and quality interpretation, to enable people to access and understand our natural environment.

Yours faithfully,

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

James Platt

From: James Platt
Sent: 29 June 2017 14:35
To: James Platt
Subject: FW: 4909/16 - Land east of Warren Lane and west of, Cresmedow Way, Elmswell

From: RM PROW Planning
Sent: 08 June 2017 14:55
To: Jacqueline Pannifer
Cc: Robert.Barber@pegasuspg.Co.UK; Martin Egan; Francesca Clarke
Subject: RE: 4909/16 - Land east of Warren Lane and west of, Cresmedow Way, Elmswell

Our Ref: W234/ROW1014/16

For The Attention of: James Platt

Public Rights of Way Response

Thank you for your consultation concerning the above application.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

There are no public rights of way directly affected by this proposal, therefore we have no objections.

Our s106 requirements relating to the proposed public footpath link have been including with the Highways Development response.

Informative Notes

The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

To apply to carry out work on the Public Right of Way or seek a temporary closure, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

To apply for structures, such as gates, on a Public Rights of Way, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.

2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.
3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.
5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
 - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
 - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
 - **Restricted byway** – has similar status to a bridleway, but can also be used by a 'non-motorised vehicle', for example a **horse and carriage**.
 - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

More information about Public Rights of Way can be found at www.suffolkpublicrightsofway.org.uk

Regards

Jackie Gillis
Green Access Officer
Access Development Team
 Rights of Way and Access
 Resource Management, Suffolk County Council
 Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

 <http://www.suffolkpublicrightsofway.org.uk/> | [Report A Public Right of Way Problem Here](#)

For great ideas on visiting Suffolk's countryside visit www.discoversuffolk.org.uk |  

Your ref: 4909/16
Our ref: 00048605
Date: 19 January 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Stuart McAdam
Senior Planning Officer
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Stuart,

Re: Elmswell, Land east of Warren Lane and west of, Cresmedow Way - Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access.

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council.

Proposed number of dwellings from development:	2 bedroom+ Houses	Total
	38	38

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

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

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

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and

Infrastructure.

- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

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. Mid Suffolk are required by Regulation 123 to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. The requirements being sought here would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

Site specific mitigation will be covered by a planning obligation and/or planning conditions.

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

- 1. Education.** Continued uncertainty about the scale and location of growth in Elmswell in the absence of a site allocation document presents difficulty for the county council in determining how the appropriate education strategy for Elmswell can be best delivered.

NPPF paragraph 72 states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide

opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

School	Capacity			Actual/Forecast Pupil Numbers					
	Permanent	95%	Temporary	Total	2016-17	2017-18	2018-19	2019-20	2020-21
Elmswell CP School	315	299		299	263	281	297	319	334
		0		0					
Thurston Community College	1940	1,843		1,843	1828	1849	1862	1872	1868
		0		0					
		0		0					

School level	Minimum pupil yield:	Required:	Cost per place £:
Primary school age range, 5-11:	10	10	12,181
Secondary school age range, 11-16:	7	0	18,355
Secondary school age range, 16+:	2	0	19,907

Total education contributions:	£121,810.00
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Where major new housing developments create an additional need for school places, a proportionate developer contribution is expected in meeting this requirement. If the strategy was to expand the existing schools to accommodate the additional pupils this would be captured through the Community Infrastructure Levy (CIL). New schools would be captured through planning obligations as they are not included in the District Council's 123 list.

The local catchment schools are Elmswell Community Primary School and Thurston Community College.

Secondary School

The catchment secondary school does not have sufficient spare places to absorb the additional secondary pupils, but Ixworth Free School does. Sixth Form pupils can be accommodated at the Thurston Community College sixth form campus at Beyton. Therefore, this development is not expected to necessitate a bid for the District Council's CIL funds.

Primary School

We forecast to have no surplus places at the catchment Primary School to accommodate children arising.

Recent discussions have been based around the opportunity to expand the existing primary school from 315 to 420 places (2 forms of entry). The County Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX

Council commissioned its consultants, Concertus, to undertake a stage 1 feasibility exercise to see what can be achieved on the site. Concertus have considerable experience in drawing up plans and delivering school extensions on challenging sites similar to this one (for example St Margaret's CEVA Primary School in Ipswich). The conclusions of the stage 1 feasibility report confirmed that it would be possible with some innovative design solutions to increase the school capacity to 420 places whilst also improving the school operational environment. Concertus provide three options as to how 420 places could be achieved. The cost estimates are between £924,000 to £1,080,000.

As the report establishes that it is possible to expand the existing schools to accommodate the additional pupils this approach would be captured through the Community Infrastructure Levy (CIL). However, it is important to acknowledge that this is not the confirmed shared education strategy at this moment in time and this will need confirming with the school and planning permission secured. The head teacher has been approached about the option of expansion, and no negative feedback was received and this will be further discussed in 2017.

Expanding the existing school is considered to be the most sustainable and cost effective solution to cope with pupils arising from housing growth. Careful consideration will need to be given to such matters as design, building materials, parking and highways safety. In addition, expansion of the school will require the removal of some of the trees and for investment in creating new external all-weather playing & sports facilities, in order to cope with extra children and to meet curriculum needs. These additional costs will be included with the expansion costs to be funded through a future CIL bid to the District Council.

Future Growth

It is important for the District Council to consider that due to the anticipated likely levels of growth in Elmswell, it is expected that a new primary school will be needed in the future once the additional 100 places have been used up by development. Land and build costs will be secured by S106 contributions for the new primary school, which will be an additional cost to CIL contributions for 123 infrastructure. Where a new primary school is needed in addition to the existing primary school, this new school is likely to be constructed as a 210-place school initially, with an estimated construction cost of £4.35 million. The land required for the school would be 2.2ha which would include an early years setting. This is dependent on the expected level of growth in the area being confirmed by the District Council.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free

provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

Through the Childcare Act 2016, the Government will be rolling out an additional 15 hours free childcare (making a total of 30 hours per week of free provision) to eligible households from September 2017.

This development is in the Elmswell and Norton Ward where there are 5 Early Years providers. It is predicted that there will be a deficit of 25 places in this area. This matter would result in approximately 4 pre-school children arising.

	Minimum number of eligible children:	Required:	Proportionate cost per place £:
Pre-School age range, 2-4:	4	4	6,091
Required pre-school contributions:			£24,364.00

3. Play space provision. Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

4. Transport issues. The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This has been co-ordinated by Martin Egan of Suffolk County Highway Network Management and sent 2nd December 2016.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards

(2002). The guidance can be viewed at <http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Planning/2014-11-27%20Suffolk%20Guidance%20for%20Parking.pdf>

5. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. This calculation assumes an average of 2.4 persons per dwelling.

Using established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent on improving development of library services serving the area of the development, and outreach activity from Elmswell library.

Libraries contribution:	£8,208.00
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6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

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

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

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

Waste Contribution:	£ 0.00
---------------------	--------

7. **Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as

part of the overall affordable housing requirement. We would encourage all homes to be built to the 'Lifetime Homes' standard.

- 8. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Additionally, and more widely, when considering major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

On 18 December 2014 the secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

"local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

The changes set out in the MWS took effect from 06 April 2015.

- 9. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provide support and advice on their installation.

- 10. Archaeology.** Please refer to Rachael Abraham's (SCC, Senior Archaeological Officer) letter dated 10th January 2017.

- 11. High-speed broadband.** SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion, it also impacts educational attainment and social wellbeing, as well as impacting 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

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

www.suffolk.gov.uk

exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

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

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

14. Summary Table

Service Requirement	Contribution per dwelling	Capital Contribution
Education Primary schools – this will need to include additional costs of tree removal and multi use pitch once costed.	£3,205.53	£121,810.00
Education – Secondary	£ 0.00	£ 0.00
Education – Sixth Form	£0.00	£ 0.00
Pre-School Provision	£641.16	£24,364.00
Transport – see section 4 above		
Libraries	£216.00	£8,208.00
Waste	£0.00	£0.00
Total	£4,062.69	£154,382.00

The table above would form the basis of a future bid to the District Council for CIL funds if planning permission was granted and implemented. This will be reviewed when a reserved matters application is submitted.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
 Senior Planning and Infrastructure Officer
 Planning Section, Strategic Development, Resource Management Directorate
 cc Neil McManus – SCC
 Iain Maxwell – SCC

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 20 April 2017 16:12
To: Planning Admin
Subject: RE: Reconsultation on Planning Application 4909/16

Hello,

Our consultation comments remain the same:

CIL becomes a consideration on the granting of Reserve Matters. Since this could be in a number of years' time the CIL Levy Rate could change during this period. Any Reserve Matters residential development would currently be subject to the High Value CIL Levy Rate for the Area. This is currently set at £115m² and is subject to indexing.

Kind regards,

Angharad Firth
Infrastructure Support Officer
Infrastructure Team
Babergh and Mid Suffolk District Council – Working Together

Mob: 07710854584
Tel: 01449 724978

Personal Office Hours: Mon-Thurs 9:00 – 17:00 Fri 9:00 – 16:30

4909/16

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Suffolk Fire and Rescue Service

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

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

MID SUFFOLK DISTRICT COUNCIL
PLANNING CONTROL
RECEIVED
21 FEB 2017
ACKNOWLEDGED
DATE
PASS TO SMC

Your Ref:
Our Ref: FS/S106 + 4909/16
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 16/02/2017

Dear Sirs

Land East of Warren Lane and West of Cresmedow Way, Elmswell IP30 9DT
Planning Application No: S106 + 4909/16

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

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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.

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

Yours faithfully



Mrs A Kempen
Water Officer

Copy: Mr Robert Barber, Pegasus Group, Suite 4, Pioneer House, Vision Park,
Histon, Cambridge CB24 9NL

Enc: Sprinkler Information

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

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

SUFFOLK DISTRICT COUNCIL
PLANNING CONTROL
RECEIVED
21 FEB 2017
ACKNOWLEDGED
DATE
PASS TO *SMA*
Date:

Your Ref: ENG/AK
Our Ref: Mrs A Kempen
Enquires to: 01473 260486
Direct Line: Angela.Kempen@suffolk.gov.uk
E-mail: www.suffolk.gov.uk
Web Address: 16/02/2017

Planning Ref: S106 +4909/16

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land East of Warren Lane and West of Cresmedow Way, Elmswell IP30 9DT
DESCRIPTION: Proposed Erection of 38 Dwellings
NO: HYDRANTS POSSIBLY REQUIRED: REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority will request that 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, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

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.

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

Yours faithfully



Mrs A Kempen
Water Officer

From: Jason Skilton
Sent: 31 May 2017 09:15
To: X Delete Aug 17 - Planning Emails
Cc: James Platt
Subject: 2017-05-31 JS Reply Land east of Warren Lane and west of, Cresmedow Way, Elmswell Ref 4909/16

Dear James Platt,

Subject: Land east of Warren Lane and west of, Cresmedow Way, Elmswell Ref 4909/16

Suffolk County Council, Flood and Water Management have reviewed application ref 4909/16

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

1. Flood Risk Assessment Appendices Ref: CCE/S761/FRA(WL)-02 Nov 2016
2. Indicative Masterplan (*no reference number*)
3. Site Plan ref E0208_08 SHEET NO: 4 rev: D

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
Dimensioned plans and drawings of the surface water drainage scheme;
 - i. 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;
 - ii. 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;
 - iii. 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;
 - iv. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - v. Topographical plans depicting all exceedance flowpaths 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;

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

2. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

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

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register

4. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

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 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be is subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00019805

Local Planning Authority: Babergh District

Site: Land east of Warren Lane and west of,
Cresmedow Way, Elmswell

Proposal: Development of up to 38 dwellings inclusive of
affordable housing, with associated vehicular
and pedestrian accesses, pedestrian links,
works, infrastructure, open space, landscaping
and green infrastructure

Planning Application: 4909/16

Prepared by: Sandra Olim

Date: 27 February 2017

If you would like to discuss any of the points in this document please
contact me on 0345 0265 458 or email
planningliaison@anglianwater.co.uk

ASSETS

Section 1 – Assets Affected

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

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

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

Section 4 – Surface Water Disposal

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

Section 5 – Trade Effluent

- 5.1 Not applicable
-



SUFFOLK CONSTABULARY

Secured by Design



Jackie Norton
Design Out Crime Officer
Community Safety Unit/
/Bury St Edmunds Police Station
Norfolk Constabulary/Suffolk Constabulary
Raingate Street, Bury St Edmunds, Suffolk, IP33 2AP
Tele: 01284 774141 Fax: 01284 774130
Mobile: 07803737748
www.norfolk.police.uk www.suffolk.police.uk

PLANNING APPLICATION: Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access.

Location: Land east of Warren Lane and west of, Cresmedow Way, Elmswell

Application Number: 4909 / 16

Dear Mr McAdam

25 January 2017

Thank you for allowing me to comment on the above application for 38 dwellings.

At present I do not have enough detailed plans and information to fully comment on this proposal.

However, the following is embedded within the Babergh and Mid Suffolk Core Strategy Development Plan 2008 (updated 2012), Section 1, para 1.19 under Local Development Framework and Community Strategy states and I therefore strongly recommend that the developers apply the following **General and Site specific** recommendations:

“A safe community: Protect the environment from pollution, flooding and other natural and man-made disasters; reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment”.

General Recommendations:

1. I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development.
2. As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards
[http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured by Design Homes 2016 V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured%20by%20Design%20Homes%202016%20V1.pdf)
3. SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide. namely Gold, Silver or Bronze standards It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>

**NOT PROTECTIVELY MARKED
RESTRICTED/CONFIDENTIAL**

4. To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
- All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
 - All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
 - Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, or STS204 issue 3:2012, or LPS1175 issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.
5. It is now widely accepted a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of that development.

SITE SPECIFIC RECOMMENDATIONS:

1. I note that there is an area of open space in-between the two sections of houses, my recommendation would be that planting in this area conforms to Section 1 point 8,9 and 17 of Secured by Design Homes 2016. Therefore some form of defensible space is implemented in order to prevent vehicles being parked on these areas or allowing the areas to become "picnic areas" and provide the opportunity for Anti-social behaviour activity. Anti-social behaviour can have many causes, but common causes are;

- A lack of parking, especially at peak times and around honey pot spaces like schools;
- Problem residents, especially in blocks of flats lacking the necessary surveillance and security measures;
- Lack of suitable facilities for young people;
- Inconsiderate driving;
- Inadequate boundaries between public open spaces and (the rear of) dwellings.

I also advise the developers to seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

A further downloadable document can be obtained using the following link: <http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

To summarise, at this stage I do not feel I have the level of detail I require to make specific comments in relation to 'designing out crime' for this outline application and I welcome the opportunity to work with the developer at the earliest stage in order to maximise the potential for reducing crime.

Please do not hesitate to contact me if you require clarification with regards to any of these points or would like help with the SBD application.

Yours sincerely

Jackie Norton

Jackie Norton
Design Out Crime Officer
Suffolk Constabulary

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines. Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.

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



Planning Services
Mid Suffolk District Council,
131 High Street,
Needham Market,
Suffolk IP6 8DL

25/01/2017

For the attention of: Stuart McAdam

Ref: 4909/16; Land east of Warren Lane and west of, Cresmedow Way, Elmswell

Thank you for consulting us on the outline planning permission Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access.

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

Recommendations

In terms of the likely visual effect on the surrounding landscape, the proposals will inevitably have an impact on the southern side. The northern part of the site is enclosed by existing residential development and as such, the proposals will have a minor impact at this location. The character of the site will change significantly as part of this proposal, but this will be mitigated through new green infrastructure including hedgerow and woodland planting. The new development will be in keeping with the immediate surrounding character.

The following points highlight our key recommendations for the submitted proposals:

- 1) Review the proposed residential layout to be more in keeping with the surrounding context; the outline layout appears very regular and uncharacteristic of the area. The existing character of the surrounding area is predominantly housing with an informal building line, the indicative masterplan does not reflect this,
- 2) The transition between the existing residential areas and proposed needs to be explored at a greater detail providing a similar characteristic and local planting species,
- 3) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted as part of a planning condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, (5 years ideally) to support plant establishment,
- 4) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved,
- 5) Review the position of the proposed dwelling fronting onto Cresmedow Way (top corner). Existing houses along this road have an active front which should be replicate as part of the new development,
- 6) The proposed focal space would be improved with additional planting.



The proposal

The application plans set out the outline planning permission for the erection of 38 dwellings with associated vehicular and pedestrian access.

The site comprises 1.86 hectares of agricultural land and is located on the southern boundary of Elmswell. Residential properties of Warren Lane, Cross Street and Cresmeadow Way surround the site's northern, eastern and western boundary and agricultural farm land predominantly surrounds the southern boundary.

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape and Visual Impact Assessment, Design and Access Statement.

Landscape and Visual Impact Assessment has been produced to the appropriate guidance. The report includes an analysis of 8 viewpoints from around the site which suitably measure the potential impact of the development within the landscape.

The indicative masterplan informs of the proposed landscape within the site. The plan proposes green open spaces with tree planting and attenuation areas and swales with marginal planting. New hedgerow and tree planting will be implemented on the site boundary to screen the development from surrounding footpaths. Linear tree planting along the main street is proposed. New pedestrian links have been proposed to link up with existing footpaths from the south of Elmswell allowing for a continuous route through the proposed development to the centre of Elmswell.

Likely impact on the surrounding landscape

The site sits within two character areas: Ancient Plateau Clay Farmlands and Rolling Valley Farmlands and Furze. Both areas for development are currently arable fields and have minor landscape features.

The majority of the site falls within the Ancient Plateau Clay Farmlands character area which is dominated by arable farmland subdivided by an irregular sinuous field pattern, and scattered with woodland. Within this character area settlement is scattered widely throughout this landscape, with parishes tending to have multiple built clusters of various sizes: large groups often elongated; outlying groups often based on green side settlement; and wayside settlements and farmsteads. These historic patterns within parishes are easily lost to infill and ribbon development and should be used to inform any emerging development proposal.

The other site area fall within Rolling Valley Farmlands and Furze is characterised by co-axial fields systems, mixed hedgerows, fragmentary cover of woodland, areas of sand and gravel extraction, and valleys with river terraces and sandy soil.

As part of a desktop review, the proposals benefit from existing tree and hedgerow planting on the boundary on the northern side. This part of the site is enclosed by existing residential development making this area more capable of accommodating the new proposals. The southern part of the site sits open within arable fields, which makes the site more sensitive to change. The landscape proposals sets out planting mitigation to ensure views of the development from surrounding areas are kept the visual impact to a minimum. (See recommendations with regards the need to develop a detail landscape plan to inform the landscape masterplan.)

Proposed mitigation

There are opportunities for tree planting and hedgerow planting around the boundaries of the site and within the site area. Attenuation areas, swales and marginal planting have been proposed to manage water run-off from the proposed hard standing areas.

The proposed green infrastructure aims to minimise the visual impact of the new development and to provide the new and existing residents with green open spaces for amenity use. It will also mitigate views to the development from Warren Lane.

An appropriately detailed landscape and boundary plan will be required to support the application to both address the objectives of the Landscape Masterplan and provide a comprehensive landscape proposal, suitable to mitigate any negative visual effect the proposals may have on the existing settlement.

Yours sincerely,

Almudena Quiralte BA(hons) DipLA, ALI
Landscape Architect Consultant
Telephone: 03330136858
Email: almudena.quiralte@essex.gov.uk

N.B. This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to the particular matter.

Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Rachael Abraham
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Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_4909
Date: 10 January 2017

For the Attention of Stuart McAdam

Dear Mr Isbell

Planning Application 4909/16 – Land east of Warren Lane and west of Cresmeadow Way, Elmswell: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. Prehistoric and Roman finds and features were recorded during archaeological investigations to the south-east (EWL 004, WDN 002, 011 and 013) and to the east, a Roman oven and features of Saxon date were identified (EWL 037). Roman and medieval features have also been recorded to the north-west (EWL 003, 005, 013 and 021). As a result, there is high potential for the discovery of below-ground heritage assets 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 141), 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 (2012).

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, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of 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 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.

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,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

James Platt

From: James Platt
Sent: 29 June 2017 14:45
To: James Platt
Subject: FW: 4909/16 Warren Lane, Elmswell.

From: David Pizzey
Sent: 25 May 2017 10:47
To: James Platt <James.Platt@babberghmidsuffolk.gov.uk>
Subject: 4909/16 Warren Lane, Elmswell.

James

There appears to be little conflict between this development, based upon the illustrative masterplan, and any significant trees/hedges on site. I therefore have no objection in principle to this application subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report. An appropriate condition should be used for this purpose.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
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Babergh and Mid Suffolk District Councils - Working Together



Arboricultural
ASSOCIATION

Fellow Member



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24/01/2017

Dear Stuart,

RE: 4909/16 Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access. Land east of Warren Lane and west of Cresmedow Way, Elmswell

Thank you for sending us details of this application, we have read the ecological survey report (Ecology Solutions Ltd, November 2016) and we note the findings of the consultant. We have the following comments:

The consultant recommends a sympathetic lighting scheme if deemed necessary. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained around the site for foraging and commuting bats. We recommend that Suffolk County Council's street lighting strategy is used as a basis for street lighting layout and design, alongside the recommendations made in the ecological survey report.

There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries between gardens (with gaps of 13x13cm at ground level) as part of this development. For more information on this topic, see the Hedgehog Street website.

We note areas have been designated as green space with the provision of a wildflower meadow and Sustainable Urban Drainage Systems, and that a landscape buffer is proposed along the southern boundary of the site. We query how these areas will be managed to maximise their biodiversity in the long term?

We also note that a number of ecological enhancement measures are recommended in the ecological survey report. In addition to these, we recommend that integrated bird boxes suitable for swifts (a UK and Suffolk Priority species) are incorporated into the proposed development.

Notwithstanding the above, we request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton
Conservation Planner

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Registered charity no 262777

From: Iain Farquharson
Sent: 24 April 2017 09:39
To: Planning Admin
Subject: M3 188546. Reconsultation on Planning Application 4909/16

Dear Sir/Madam

The Sustainability Statement supplied is very basic and only provides minimal commitment to a sustainable dwelling. In the main the document simply confirms compliance with the standards required by building regulations (Part L, Part G)

It is possible that the dwellings may require design changes including renewables which will fundamentally affect the appearance of the development and its impact on the surroundings which need to be considered before permissions is granted.

The recommendation is refusal.

Should the planning authority approve the application, we request that the following condition is included.

Before any development is commenced an Energy Strategy detailing how the development can secure the required energy efficiency and sustainability standards of the Local Planning Authority shall be submitted to, and approved in writing by, the Local Planning Authority.

The development shall be implemented in accordance with the approved Energy Strategy and shall not commence above ground level until full Design Stage details have been submitted to and approved in writing by the Local Planning Authority demonstrating that the development is capable of achieving the required standard in accordance with the approved Energy Strategy, and any subsequent approved revisions.

Prior to first occupation of the building(s), evidence (e.g. photographs, commissioning certificates and As-Built certificates derived from the National Calculation Methodologies) which demonstrates that the development has been constructed in accordance with the approved Energy Strategy (and any subsequent approved revisions) should be submitted to the Local Planning Authority and approved in writing.

Reason - In order to ensure the long-term sustainability of the development through on-site use of renewable resources, and to ensure that the development makes the fullest contribution to minimising carbon dioxide emissions in accordance with the development plan.

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@baberghmidsuffolk.gov.uk

From: Philippa Stroud
Sent: 18 January 2017 17:01
To: Planning Admin
Cc: Stuart McAdam
Subject: 4909/16/OUT Land east of Warren Lane and west of, Cresmedow Way, Elmswell - Other Issues

WK/188547

Ref: 4909/16/OUT EH – Other Issues
Location: Land east of Warren Lane and west of, Cresmedow Way, Elmswell
Proposal: Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access.

Thank you for the opportunity to comment on the above outline planning application.

I note the satisfactory noise assessment by LF Acoustics dated November 2016 in respect of the suitability of the site for residential use.

I have no objection, in principle, to the proposed development. I recommend, however, that a planning condition is attached which restricts the hours of noise intrusive work during construction of the development to:

Monday to Friday between 08:00 hrs and 18:00 hrs
Saturday between 09:00 hrs and 13:00 hrs
No noise intrusive work to be undertaken on a Sunday, Bank or Public Holiday.

Reason – To minimise detriment to nearby residential amenity.

I also recommend that no development shall take place until a Construction Method Statement has been submitted to, and approved by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- a) the parking of vehicles of site operatives and visitors
- b) loading and unloading of plant and materials
- c) storage of plant and materials used in construction
- d) wheel washing facilities
- e) measures to control the emission of dust and dirt during construction works
- f) a scheme for recycling/disposing of waste resulting from construction works
- g) a scheme to control noise during the construction phase.

Reason – To minimise detriment to nearby residential amenity.

Regards,

Philippa Stroud
Senior Environmental Protection Officer
Babergh and Mid Suffolk District Councils - Working Together

From: Nathan Pittam
Sent: 27 April 2017 14:13
To: Planning Admin
Subject: 4909/16. EH - Land Contamination.

M3 : 192755

4909/16. EH - Land Contamination.

Land east of Warren Lane and west of, Cresmedow Way, Elmswell, BURY ST EDMUNDS, Suffolk.

Reconsultation due to revised site location plan and revised Highway details - Outline Planning Permission sought for the erection of 38 dwellings with associated vehicular and pedestrian access.

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that it is supported by a Phase I desk study produced by Nott Group (ref. 72523/R/001) dated 26th August 2016. The report covers both on site and off site sources of contamination and concludes that the risk to the proposed development is low and I can concur with this conclusion. As such I have no objections to raise with respect to land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards

Nathan

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

Babergh and Mid Suffolk District Councils – Working Together

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