

PARISH COUNCIL
Comments from: Elmswell Parish Council

Planning Officer: James Platt
Application Number: 4911/16 – revised as notified 21.04.17

Proposal: Outline planning permission for the development of up to 240 dwellings with associated works including vehicular and pedestrian accesses, pedestrian links, infrastructure, open space, landscaping, community parkland and green infrastructure.

Location: Land adjacent to Wetherden Road, Elmswell, IP30 9DG

Councillors register strong 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, with the separate application for 38 dwellings on land at Warren Lane. 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.

| School Capacity | PAN | Forecast peak age group sizes | | | | |
|-----------------|-----|-------------------------------|---------|---------|---------|---------|
| | | 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 Gramplan 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 |
|---|---|----|----|----|----|

| | 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 professionals practitioners, as unrepresentative. At the Cross St crossroads, the ill-founded exercise produced 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.

The recent Mid Suffolk SHLAA identified these issues in its assessment of the sites ELM04 / ELM08 where, **'highways access...is an issue.'**

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.*** Although the applicant attempts to suggest that this proposal can stand in isolation from the contiguous proposal ref 4909/16 at Warren Lane / Cresmedow Way, it is clearly part and parcel of the same, unacceptable, stress event. The foregoing suggests that 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

Peter DOW

on behalf of the Elmswell Parish Council

05.05.17

Planning Application 4911/16

Development of up to 240 dwellings with associated works.

Land adjacent to Wetherden Road, Elmswell.

Response of Wetherden Parish Council

The easternmost boundary of the proposed development lies 0.7 miles (1.126 km) from the centre of Wetherden, taken as the crossroads by the Maypole Inn. The easternmost boundary equally abuts directly on the western boundary of the 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, and the new development, in effect, is the same size. If taken with the twin site under 4909/16 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:

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% (equating to 44 cars at peak times) 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'. EPC's more up to date data suggests using an 80 – 100% increase in traffic volume to give an accurate assessment of traffic movements along Wetherden Road. 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. Creating yellow lines to remove cars from the road is not an option given the lack of viable off street parking. 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. We refer to speeding further in this letter.

Wetherden has facilities that are closer to the proposed development than similar ones in Elmswell, for example, the village hall, football pitch, playing field, tennis court, playground and pub. At present the roads in Wetherden already present a real hazard to pedestrians given the lack of pavements or pedestrian crossings and the number of blind corners. With the people living in the proposed development presumably wanting to access the facilities in Wetherden this would increase the number of vehicles and pedestrians into Wetherden.

Equally Wetherden residents rely on Elmswell services such as the Co-op, school and the station, and increased traffic movements from this development will make it even more dangerous for those without cars to access these.

We call for adopted, lit, hard surface pedestrian and cycle access between Elmswell and Wetherden to be included in any planning proposals in order to make the roads safer, and to enable safe and non-vehicular access to Wetherden facilities.

Speeding through the direct road from Elmswell past the development and through Wetherden towards Stowmarket has long since known to be a problem, which indeed we tried to resolve with Community Speedwatch. WPC is currently again trying to find solutions to the problem. Increased traffic volume will make this problem worse, as ever more people from this and other Elmswell developments seek to get to work schools etc in a hurry.

The road between Elmswell and Wetherden is currently at National Speed Limit (60mph). The proposal is to make it 30mph to the eastern end of the development but again nothing has been considered further from there. There have been accidents along the road especially in winter conditions. Councillors feel that two actions are needed: the remaining road from the development into Wetherden should be at 40mph to help mitigate the speed at which traffic enters from the west, and the road coming out of Elmswell should be lit for the full length of the new 30mph to where it joins the existing lit road.

We would point out that Default Plan Policy T10 requires that the authority **will have regard to the suitability of existing roads given access to the development, in terms of the safe and free flow of traffic and pedestrian safety.** The development as proposed is clearly in breach of this and should be rejected on these grounds alone, and not considered until this condition has been properly considered with WPC and fulfilled.

SCC and MSDC will be aware that many homes both on the Elmswell Road and other roads in Wetherden, are old, in some cases listed. Increased traffic movement concerns us. It will affect these structures, as the vibrations from traffic increase. WPC concern is that there is no indication whether Wetherden will benefit in any way from CIL and other contributions towards the management of the road in terms of the impact of the traffic, and the quality of the road surface.

Environment

Councillors are concerned that this large development on the very edge of Wetherden and its associated traffic volumes, will lead to increased noise, increased demands on drainage, and more light and air pollution. Wetherden lies at the lower end of the hill leading into the village. The pollution will thus flow downwards towards Wetherden. Increased footpaths and cycle tracks would be of assistance here, to at least offer more people the opportunity to move

between villages other than in cars. We see no mention of a contribution by the developer to sustainability, or any acknowledgment of the need to consider climate change issues.

WPC believes also that this greenfield site, forming part of the agricultural supply of the area, should not be considered for building until sites in Elmswell offering a greater level of sustainability have been considered. Priority should be given to, for example: land behind Elmswell Church leading directly to the A14 which would lessen the traffic through Elmswell, Wetherden and Haughley New Street, the Grampian Foods site which is currently developing 190 homes and has a nominal capacity for at least a further 340 (17.7hectares x eg 30 dwellings – 190).

To the southern boundary of the proposed site is a covered over waste pit, from which methane is extracted. We are concerned to ensure that leaching levels have been monitored and are satisfactory for building this close to.

Flooding

Councillors are concerned about the increased volumes of surface water that will not soak away once this development has been completed. Giving the topography of the area, we fear that this will run towards Wetherden, and into the tributary of the Gipping which runs through the village. This stream at times already reaches over its banks, with flooding on land behind houses in Beech Lane, the Common etc. WPC would like to see what plans are being put in place to manage this. The current plans does not show any new drainage systems to resolve this.

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.

We ask why no shop has been included in this development. How many car journeys would be saved to the Co-op or the Mace if this were the case? Yet it has not been considered. We share Elmswell PC's concerns in these matters. We hope that MSDC has consulted Haughley about this development as it impacts on the roads through Haughley New Street.

Construction

We have seen no traffic routing plan as yet regarding construction traffic accessing the site if it proceeds. Wetherden already suffers from flagrant disregard of the routing plan agreed with the Lawn Farm Quarry, and seeks assurance that a plan will be imposed on the developer to bring vehicles in from the A14 via the shortest route to the site.

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, environmental damage, flooding, the health and safety of residents of both Wetherden and indeed the new development. We would like to see greater emphasis on encouraging people to cycle and walk, by building new footpaths between the two villages and cycle access. 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 Lerner
Clerk

on behalf of Wetherden Parish Council

26 January 2017

Your Ref: MS/4911/16
Our Ref: 570\CON\1506\17
Date:
Highways Enquiries to: christopher.fish@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
Needham Market
Ipswich
Suffolk
IP6 8DL

For the Attention of: Mr J. Platt

Dear James

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/4911/16**

PROPOSAL: Outline planning permission for the development of up to 240 dwellings with associated works including vehicular and pedestrian accesses, pedestrian links, infrastructure, open space, landscaping, community parkland and green infrastructure.

LOCATION: Land At, Wetherden Road, Elmswell

ROAD CLASS: C401

Notice is hereby given that the County Council as Highways Authority does not object to the proposal subject to a S106 planning obligation agreement and the imposition of the following conditions on any permission granted to it:

1. Condition: Prior to construction/implementation of the proposed eastern access to the north of Wetherden Road shown on drawings S761_207 and S761_206 (rev E), as submitted, as a means of access from Wetherden Road to the part of the development permitted under this planning permission to the north of Wetherden Road, a Traffic Regulation Order shall be secured by the Highway Authority for the extension of the existing 30 mph speed limit to a point shown on a plan to be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. At this time the eastern pedestrian crossing with traffic island dropped kerb and tactile paving as shown on that drawing shall be substantially completed.
Reason: In the interest of highway safety and to promote sustainable transport.
2. Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, lighting, 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.

3. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including secure cycle storage and electric vehicle charging infrastructure 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 and further to National Planning Policy Framework paragraph 35.
4. Condition: Prior to the commencement of any part of the development, details of the proposed tree planting and landscaping including root management measures shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.
Reason: In the Interests of highway safety, to prevent damage to the roads and to ensure that visibility splays and street lighting remain unobstructed by proposed planting.
5. Condition: Before the development is commenced details of the areas to be provided for storage of refuse/recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.
Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other people.
6. Condition: Before the development of each dwelling plot 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 dwelling plot and its access onto the estate roads. The approved scheme(s) shall be carried out in their entirety before the dwelling(s) are first occupied and shall be retained thereafter in its approved form.
Reason: To prevent hazards caused by flowing water or ice on the estate roads, which are prospective highways. This is necessary to ensure adequate drainage measures can and are installed.
Note: The above condition may be incorporated into an overarching drainage condition.
7. 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. This shall include how the surface water will be disposed of. 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. This is necessary because details have not been submitted to demonstrate how this will be achieved at the proposed accesses.
8. Condition: Prior to any other works commencing or delivery of any other materials to the site the new estate road junctions with Wetherden Road inclusive of cleared land within the sight splays to these junctions, as dimensioned on drawing S761_206 (rev E), and carriageway widening must be formed. This is except for the proposed eastern access to the north of Wetherden Road. The visibility splays shall thereafter be 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 safe accesses to the site(s) are provided before other works and to facilitate off street parking for site workers in the interests of highway safety.
9. Condition: The visibility splays to the east for the east access on the south of Wetherden Road and to the west for the east access on the north of Wetherden Road shall be set out tangential to the nearside carriageway channel lines to the respective dimensions on drawing S761_206 (rev E) prior to each access being formed. The visibility splays shall thereafter be 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: In the interests of highway safety.

10. 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 construction management 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~~
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) ~~protection of important trees, hedgerows and other natural features~~
- h) ~~protection of the aquatic environment in terms of water quantity and quality~~
- i) details of proposed means of dust suppression and noise mitigation
- j) details of measures to prevent mud from vehicles leaving the site during construction
- k) haul routes for construction traffic on the highway network and
- l) monitoring and review mechanisms.

~~No works in respect of the construction of the development hereby permitted and no deliveries to the site during construction shall be undertaken at the following times;~~

~~Outside the hours of 0800 – 1800 on Mondays to Fridays (inclusive)~~

~~Outside the hours of 0800 – 1300 on Saturdays~~

~~On Sundays and on public holidays~~

Reason: In the interests of highway safety and ensure compliance with the Local Plan.

Note: the struck through elements of the above condition aren't considered necessary by the highway authority but may be relevant for other reasons.

11. Condition: No dwelling shall be occupied until the highway improvements shown on drawing no S761_206 (rev E) including local carriageway widening, footways along Wetherden Road and western pedestrian crossing with traffic island dropped kerb and tactile paving have been substantially completed.

Reason: In the interests of highway safety and sustainable development.

12. 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.

13. Condition: Prior to the first access being taken via the proposed eastern access to the north of Wetherden Road shown on drawings S761_207 and S761_206 (rev E), the eastern pedestrian crossing with traffic island dropped kerb and tactile paving as shown on that drawing shall be substantially completed.

Reason: In the interests of highway safety and sustainable transport.

14. NOTE: 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.

15. NOTE: 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.

16. NOTE: The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The developer 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.

S106

Traffic Regulation Order Contribution: £10,000 towards an order to extend the 30mph speed limit. This is necessary to facilitate a proposed access.

Public Rights of Way Improvement Contribution £4,686.25 towards improvements on the attached plan and as outlined below.

Travel Plan

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan.
- Travel Plan Implementation Bond, or cash deposit - £165,430 (£689 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer, if they were to fail to deliver it themselves.
- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved welcome pack to each dwelling on first occupation
- Approval and full implementation of the Full Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

Public transport contribution: £2,500 per raised bus stop kerb, £6,000 for a shelter and base unless otherwise provided by the developer by agreement with the County Council.

All contributions are to be index linked and any unspent or not committed balance is to be repaid on written request 5 years after receipt.

Comment:

1. This development will have only a small impact on queuing at the level crossing; this will clearly not be severe. A technical note, taking account of cumulative impacts, explains this in greater detail.
2. An acceptable assessment of the impact on delays at nearby junctions has been provided in the transport assessment (TA). Reference has been made to the nationwide database 'TRICS' for vehicle trip generation, which was found to be slightly lower than the local survey of Blackbourne Road (which was carried out sometime ago). Current traffic counts have been conducted so that background growth to date is accounted for. Growth factors for background traffic appear to have been applied as referred to in chapter 5 of the TA. There is a reduced potential for growth of trips arising from the development itself. The Elmswell Parish Council suggestion of under-estimation of trips by 80-100% is not accepted.
3. The busiest junction in 2021, Church Road / School Road (priority junction), is modelled to have the highest delay. Measured as the ratio of flow to capacity this will increase by 0.031 to 0.795 in the morning peak hour. The overall delay due to the proposed development is estimated to increase would be 6 seconds per vehicle. This includes for background traffic growth, major local committed developments and vehicle trips predicted from the development. A ratio of 0.85 is the normal threshold for concern and this is some way off. The additional delay will be attributed mainly to

vehicles on School Road, as traffic from the development, heading east on Church Road, will have priority. Therefore, there is no reason to refuse this application on traffic capacity grounds; this cannot be considered to be a severe impact.

4. A change in the speed limit from National Speed Limit to 30mph is required before the proposed eastern access to the northern plot and the proposed traffic island situated in the derestricted part of Wetherden Road (see drawing S761_206 Rev. E in the TA) will be acceptable. The visibility splay to the east of the above access is insufficient for the measured west-bound speeds but could be if the speed limit were to be reduced to 30mph. The other accesses would have visibility splays related to the measured traffic speeds. The proposed pedestrian refuge would be too narrow to provide safe working space on a road where the National Speed Limit applies but again should be acceptable if the speed limit were to be reduced.
5. A traffic regulation order is required to reduce the speed limit; this is a separate legal process that cannot be assured. Ordinarily this would be a possible reason for refusal, however, the north plot can be accessed only by the western access and the pedestrian refuge isn't essential to provide pedestrian access to the southern plot but would influence drivers to drive more slowly, which given the proposed change in speed limit is accepted as beneficial. Therefore, it is considered that conditions are suitable to prevent an unsafe access being formed until the speed limit is in place. The eastern pedestrian refuge would encourage compliance with the new speed limit and therefore it would be preferable to deliver this as soon as feasible after the 30mph TRO is made.
6. The visibility splay to the east for the east access on the south site should be drawn tangential to the nearside carriageway channel line. This would fall within the footway that should be extended to the east to connect with Footpath 21.
7. Likewise, the visibility splay to the west for the east access on the north site should be drawn tangential to the nearside carriageway channel line. This would fall within the footway shown on drawing S761_206 Rev. E.
8. There is some question as to the accuracy of the highway boundary shown on drawing S761_206 Rev. E to the east of the north site, this may restrict the ability to extend a footway east to the width shown, however, a footway of adequate width should be feasible in due course.
9. The pedestrian link from the north site to Jubilee Terrace would be desirable but not essential. It reduces the walking distance by an approximate average of 100m for the north site.
10. The proposal includes laying a surface water drain under estate roads and across and under Wetherden Road. A licence will be required from the highway authority unless this is subject to a vesting agreement with Anglian Water.
11. The surface water basins along Wetherden Road shown on drawing S761 – 301 appear to overlay the footway on the south side of the road; this is not acceptable and should be clarified.
12. The development would provide 550m of footway along Wetherden Road, which is significant. A further 880m remains between the site and the footway in Wetherden. A study into the feasibility of constructing a footway for the remainder has not been carried out. Consideration could be given to this; however, a contribution would be required to do so.

Public Transport

13. There are a couple of marked bus stops on Wetherden Road near to Mill Gardens that have raised kerbs, and a parish brick shelter at the westbound stop. Dwellings at the eastern ends of the sites will be further than the recommended maximum walking distance of 400m to these stops. A site-specific contribution to provide a pair of stops on Wetherden Road near the east end is therefore warranted. These should be equipped with raised easy-access kerbs. A shelter should also be provided.
14. A contribution toward real time passenger information screens for the existing stops will be sought through CIL.

Public Rights of Way

15. The proposed development will have a direct impact on the local public rights of way (PROW) network, please refer to the map appended.
16. PROW are important for recreation, encouraging healthy lifestyles, providing green links, supporting the local economy and promoting local tourism. References to NPPF and Suffolk County Council policies are appended. The anticipated increased use of the PROW network of as a result of the development will require the following offsite improvement works, please refer to the attached plan:
 - Creation Agreement to enable the following improvements to the network:
 - Footpath link to connect Public Footpaths 22 and 25.
 - Bridleway link from Wetherden Road to Jubilee Terrace.
 - Upgrade of Public Footpaths 20 and 21 to bridleway.

Travel Plan

17. The Framework Travel Plan (dated November 2016) submitted in support of the application requires some minor revisions, which are as follows:
 - The baseline monitoring of the Travel Plan and preparation of the Full Travel Plan should take place on occupation of the 100th dwelling instead of 75% of occupation (180th dwelling). Following on from the occupation of the 100th dwelling, the Travel Plan should then be implemented and monitored for a minimum of five years, or one year after occupation of the final dwelling, whichever is the longest.
 - The multi-modal voucher should be to the value of providing two monthly bus tickets for each dwelling, or cycle, or rail voucher of equivalent value. Providing two weekly bus tickets is unlikely to allow the resident to establish a routine and habit of using the bus.
 - The marketing of the Travel Plan should go further than just providing the Travel Information Packs, as they will be a one-off measure. Other Residential Travel Plans nationally have used dedicated websites, social media, newsletters and community engagement to market their respective Travel Plans. Therefore, a commitment to include some additional forms of marketing should be included in the Travel Plan.
18. The Travel Plan target of reducing single occupancy vehicle travel by 10% is acceptable and there is also some limited connection with the Transport Assessment, which complies with the 2014 Planning Practice Guidance. For capacity analysis purposes, the higher vehicle trip rate between a local count and TRICS national database was used in the TA. This is accepted. There is a possibility that the initial travel plan targets may be slightly high but these can be adjusted following monitoring.
19. A revised Travel Plan that takes into account the comments raised above, should preferably be submitted for approval prior to the determination on the application.
20. These revisions are needed to comply with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:
 - the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - safe and suitable access to the site can be achieved for all people.
 - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.
21. Other relevant paragraphs include 34, 35, 36 and 37 as well as the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance.
22. In addition, a good quality travel plan will support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

23. To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and provide reassurance that the Travel Plan will be implemented in full Section 106 contributions are required as listed above. The implementation of the Travel Plan should be secured solely by Section 106 obligations, which are listed above. A planning condition will be insufficient due to the size and possible phasing of the development.

Yours sincerely,

Mr Christopher Fish
Senior Highway Development Management Engineer
Strategic Development – Resource Management

Appendix - Public Rights of Way

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 relevant to Public Rights of Way:

- 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.

From: RM PROW Planning
Sent: 26 April 2017 11:53
To: Planning Admin
Cc: robert.barber@pegasuspg.co.uk; Francesca Clarke
Subject: RE: Reconsultation on Planning Application 4911/16

For The Attention of: James Platt

Public Rights of Way Response

Thank you for the additional consultation in relation to the above planning application.


We note from the Agent's letter dated 12/4/17 that details of landscaping will be addressed through Reserved Matters and they would accept a condition to ensure the Public Footpaths will not be obstructed by landscaping; we are amenable to this.

It is recommended that the digital plot, re attached for convenience, is referred to when producing the detailed landscape design.

Our objection to this application is therefore removed.

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.discoveruffolk.org.uk |



From: RM Floods Planning
Sent: 17 May 2017 08:28
To: X Delete Aug 17 - Planning Admin
Cc: James Platt
Subject: 2017-05-XX JS reply Land adjacent to Wetherden Road, Elmswell, IP30 9DG Ref: 4911/16

Dear James Platt,

Subject: Land adjacent to Wetherden Road, Elmswell, IP30 9DG Ref: 4911/16

Suffolk County Council, Flood and Water Management have reviewed application ref Ref: 4911/16

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

1. Flood Risk Assessment CCE/S761/FRA(WR) 02 dated November 2016
2. Appendixes to Flood Risk Assessment CCE/S761/FRA(WR) 02 dated November 2016

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

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. 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 Qbar or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - 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 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;
 - f. 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;
 - g. Detailed of the agreement for the proposal to lay surface water drainage underneath the public highway
2. 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.

3. 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.

4. 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 as per s21 of the Flood and Water Management Act.

5. 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 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: 00019742
Local Planning Authority: Babergh District
Site: Land Adjacent to Wetherden Road, Elmswell
Proposal: Outline planning permission for the development of up to 240 dwellings with associated works including vehicular and pedestrian accesses, pedestrian links, infrastructure, open space, landscaping, community parkland and green infrastructure.
Planning Application: 4911/16

Prepared by: Sandra Olim

Date: 02 March 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 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 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 Development may lead to an unacceptable risk of flooding downstream. The Pre Planning Report was based on a gravity connection, if a pumped regime is required, a drainage strategy will need to be prepared in consultation with Anglian Water propos a pumped rate and determine mitigation measures if required.

We will request a condition requiring the drainage strategy covering the issue(s) to be agreed.

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

Section 6 – Suggested Planning Conditions

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

Foul Sewerage Network (Section 3)

CONDITION

No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

From: Graham Gunby

Sent: 28 April 2017 17:01

To: James Platt <James.Platt@babberghmidsuffolk.gov.uk>

Cc: John Pitchford <John.Pitchford@suffolk.gov.uk>; Phil Watson <phil.watson@suffolk.gov.uk>

Subject: 4911/16 | Outline planning permission for 240 dwellings,Elmswell

Hi James

I understand that you are the case officer for the above planning application. The site itself is within a Minerals Consultation Area, which includes land to the south in the ownership of Aggmax who operate Lawn Farm Quarry, Wetherden. The land immediately to the south of the 4911/16 site is known to contain viable mineral resources. Therefore any proposals to develop the 4911/16 site should include an adequate amenity buffer zone to avoid sterilizing viable sand and gravel resources. I would suggest that 100m buffer zone would suffice.

Regards

Graham Gunby

Senior Planning Officer: Minerals & Waste Policy

Your ref: 4911/16
Our ref: 00048606
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 adjoining Wetherden Road IP30 9DG - Outline planning permission for the development of up to 240 dwellings

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 |
|--|-------------------|-------|
| | 240 | 240 |

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

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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 | 1888 |
| | | 0 | | 0 | | | | | |
| | | 0 | | 0 | | | | | |

| School level | Minimum pupil yield: | Required: | Cost per place £: |
|------------------------------------|----------------------|-----------|-------------------|
| Primary school age range, 5-11: | 59 | 59 | 12,181 |
| Secondary school age range, 11-16: | 42 | 0 | 18,355 |
| Secondary school age range, 16+: | 9 | 0 | 19,907 |

| | |
|--------------------------------|--------------------|
| Total education contributions: | £718,679.00 |
|--------------------------------|--------------------|

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 Council commissioned its consultants, Concertus, to undertake a stage 1

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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 24 pre-school children arising.

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

| | |
|------------------------------------|--------------------|
| Required pre-school contributions: | £146,184.00 |
|------------------------------------|--------------------|

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: | £51,840.00 |
|-------------------------|------------|

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 exchange only connections. The strong recommendation from SCC is that a full

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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. | £2,994.50 | £718,679.00 |
| Education – Secondary | £ 0.00 | £ 0.00 |
| Education – Sixth Form | £0.00 | £ 0.00 |
| Pre-School Provision | £609.10 | £146,184.00 |
| Transport – see section 4 above | | |
| Libraries | £216.00 | £51,840.00 |
| Waste | £0.00 | £0.00 |
| Total | £3,819.60 | £916,703.00 |

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

Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
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Essex CM2 5PF

Email address: kerryharding@nhs.net

Telephone Number – 0113 824 9111

Your Ref: 16/4911

Our Ref: NHSE/MIDS/16/4911/KH

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

18 January 2017

Dear Sirs,

Outline planning permission for the development of up to 240 dwellings with associated works including vehicular and pedestrian accesses, pedestrian links, infrastructure, open space, landscaping, community parkland and green infrastructure.

Land adjacent Wetherden Road, Elmswell, IP30 9DG

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

Background

2. The proposal comprises a development of up to 240 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is 1 GP practice within a 2km catchment (or closest to) the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

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

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

Table 1: Summary of capacity position for healthcare services within a 2km radius of (or closest to) the proposed development.

| Premises | Weighted List Size ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|-----------------------|---------------------------------|------------------------------------|-----------------------|---|
| Woolpit Health Centre | 14,134 | 645.87 | 9,419 | -323.32 |
| Total | 14,134 | 645.87 | 9,419 | -323.32 |

Notes:

1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
 2. Current Net Internal Area occupied by the Practice.
 3. Based on 120m² per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
 4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment or extension at Woolpit Health Centre would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to reconfigure the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations

4 9/11/16

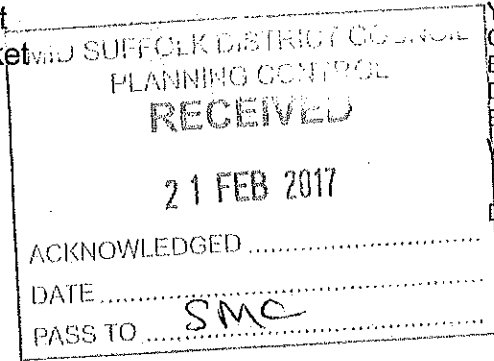
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Suffolk Fire and Rescue Service

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



Your Ref:
Our Ref: FS/F310968
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 Adjacent to Wetherden Road, Elmswell IP30 9DG
Planning Application No: S106 +49011/16

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.

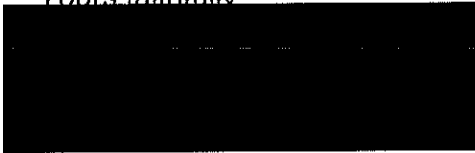
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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information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



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4911/16

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: 16/02/2017 |
| DATE | |
| PAS 4911/16 | |

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

Planning Ref: S106 + 4911/16

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land Adjacent to Wetherden Road, Elmswell IP30 9DG
DESCRIPTION: Proposed Erection of 240 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



SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raynegate Street,
Bury St Edmunds, Suffolk
Tel: 01284 774141
www.suffolk.police.uk

Planning Application (4911/16)

SITE: 240 Dwellings at Wetherden Road, Elmswell

Applicant: Endurance Estates Strategic Land Ltd

Planning Officer: Mr Philip Isbell

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.

Dear Mr Isbell

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 240 dwellings at Wetherden Road, Elmswell.

I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act.

At this stage I feel I do not have the level of detail I require to make specific comments in relation to 'designing out crime' for this outline application. However, I recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation. Further information can be found at www.securedbydesign.com.

I would further strongly advise the developers 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>

My specific observations for this development are that I applaud the designers comments that the proposals are based on best practices as laid down by the "Planning System" in particular item 58 of the National Planning Policy Framework (NPPF) and ACPO "New Homes guidance" (page 59 of Design Proposals, Paras 5.44 to 5.49).

I am also pleased to see that in the Design Proposals at Para 5.8 (page 45) referring to "Movement and Access", specific mention is made to the desire to make the development easy to navigate, safe and secure. However, I also hope that this means the development will not be too permeable?

NOT PROTECTIVELY MARKED
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Para 5.24 states that the plots will be defined by a range of boundary treatments, including walls, bollards, railings and hedges, in order to clearly define public and private spaces. I would like to know more about how the perimeters will be designed, particularly the outer perimeter and the perimeter of the rear of each property. I would recommend the rear of each property comprises 1.8m close boarded fencing, or at the very least 1.5m close boarded fencing accompanied by further 300 cm high trellis.

I would also like to see 1 metre metal hooped railings around the communal areas.

The outlined plan states that properties will have a strong frontage.

1.0 SECURE BY DESIGN (SBD)

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'.

2.0 REFERRALS

2.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.

2.12 The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.

2.13 One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

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.**

2.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised.

This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

2.3 Department for Transport – Manual for Streets (Crime Prevention)

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

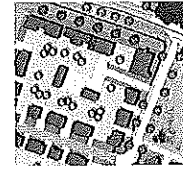
Safer Places highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*: also refer to Technical Advice Note (TAN) 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.
- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

3.0 GENERAL COMMENTS ON PROPOSED PLAN

My specific observations for this development are as follows: (Further details of the following recommendations can be found in the above SDB document "Homes16").

- 3.1 I would like to know how the perimeters will be comprised for the outer perimeter of the site, especially at the southern end of the plot for the communal area.
- 3.2 I would like more information on the perimeters for each property and ask that all the rear of properties are secured with 1.8m close boarded fencing, or at least 1.5m close boarded fencing with additional further 300cm high trellis.
- 3.3 I would like to know how the perimeter for the two middle properties, (pictured right) with their own access drive will be secured.
- 3.4 I would like to see properties with gable end windows that look onto public spaces, to provide natural surveillance, especially for the communal space area.
- 3.5 Should any play equipment be installed it should meet **BS EN 1176** standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to **BS EN1177** standards.
- 3.6 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 3.7 All litter bins should be of a fire retardant material.
- 3.8 Attention should be paid to the sighting and fixing of **Gates, Fences, Seats and Pathways**. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.
- 3.9 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 3.10 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).



4.0 **CONCLUSION**

- 4.1 I strongly advice the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 4.2 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
- 4.3 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/>
- 4.4 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:

- a. 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.
- b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
- c. 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.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

5.0 FINAL CONCLUSION

As I do not have sufficient information on the proposed planning application, I can neither approve, nor object to this proposed plan.

I hope the planners will adopt Secure By Design standards and apply the security principals stated at part 5 within their Design Proposals statement.

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely



Phil Kemp

Designing Out Crime Officer
Western and Southern Areas
Suffolk Constabulary
Raynegate Street
Bury St Edmunds
Suffolk
IP33 2AP

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

24/01/2017

For the attention of: Stuart McAdam

Ref: 4911 / 16; Land adjacent to Wetherden Road, Elmswell, IP30 9DG

Thank you for consulting us on the outline planning permission for the development of up to 240 dwellings with associated works including vehicular and pedestrian accesses, pedestrian links, infrastructure, open space, landscaping, community parkland and green infrastructure.

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, in particular the area to the south of Wetherden Road due to its size and open views to farmland. The character of the site will change significantly as part of this proposal, but this will be mitigated through new green infrastructure, hedgerow and woodland planting. The new development will be set back from the main road Wetherden Road which is in keeping with the existing settlement character.

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

- 1) The transition between the existing residential areas and proposed needs to be looked at in detail to continue with similar character and local planting species,
- 2) 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, (ideally 5 years) to support plant establishment,
- 3) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved.
- 4) The transition between primary and secondary routes could be improved as part of a gateway approach through the introduction of planting treatment or similar,
- 5) Review of the green open space provision within the northern site (to the north of Wetherden Road). While the developed area to the south has an extensive green open space (showed as community parkland on the plans) for amenity use as well as a central green space, the proposed residential area to the north lacks of green open spaces



within the residential layout. The nearest green open area will be the attenuation area, but this is not part of the design layout,

- 6) Need to clarify water flows and SuDS strategy within the site. A diagram showing flows and directions should be submitted to inform the SuDS strategy for the proposed development,
- 7) The water flows and SuDS strategy need to be clarified within the site. A diagram showing flows and directions should be submitted to inform the SuDS strategy for the proposed development,
- 8) Review of the proposed landscape strategy on the approach to the site from the east along Wetherden Road.

The proposal

The application plans set out the outline planning permission for the development of up to 240 dwellings with associated works including vehicular and pedestrian accesses, pedestrian links, infrastructure, open space, landscaping, community parkland and green infrastructure on an agricultural site at either side of Wetherden Road in Elmswell. The site comprises a total of 11.58 hectares of land situated on the eastern edge of Elmswell and made of two parcels, one to the north of Wetherden Road and one to the south. Both areas currently are under intensive arable use.

Review on the submitted information

Relevant to this landscape review, the submitted application includes a Landscape and Visual Impact Assessment, Design Proposals and Arboricultural Survey, Impact Assessment and Protection Plan.

The Landscape and Visual Impact Assessment has been produced to the appropriate guidance. The report includes an analysis of 12 viewpoints from around the site which suitably measure the potential impact of the development within the landscape.

The illustrative Landscape Masterplan (Figure 7 on The Landscape and Visual Impact Assessment) sets out the vision for the proposed landscaping within the site area. The plan includes proposals for trees along the primary streets with hedge planting, swale and landscaping with linear trees along Wetherden Road. Two water attenuation areas have also been highlighted as well as an extensive area designated as community parkland. Additional boundary landscape planting to complement the existing character area and to mitigate impact of the proposed development has also been proposed. The proposal indicated on the Landscape Masterplan is appropriate but needs to be reinforced by a detailed landscape planting plan (see recommendations point 2) and some landscape aspects of this need to be reviewed. (See recommendations above.)

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.

Based on a desktop review, the proposals utilise the existing hedge field boundaries to the north and east to screen the site from the surrounding areas and existing PROW. Views to the site from the north and east are restricted due to the existing vegetation. Whether views from the south to the site are critical and no existing vegetation is presence.

The houses on the edge of the existing settlements will be most affected as they will lose the open views to the countryside. Mitigation and managing views to the proposed parkland will be a key aspect.

Proposed mitigation

There are opportunities to create small woodland parcels and hedgerow planting along the site boundaries and of planting within the development; these are included as part of the proposed landscape masterplan.

As set out in the supporting documentation, the two parcels differ in topography and areas of existing vegetation. While the northern parcel is relatively flat and quite enclosed by existing hedgerows, the southern parcel slopes gradually up towards a localised ridgeline and has no field boundary on both northern and southern boundaries.

The proposed green infrastructure aims to minimise the visual impact of the new development from nearby footpaths. Some of the views studied on the Landscape and Visual Impact Assessment have shown to have direct views to the proposed development. This is mitigated by the proposed green infrastructure which appears to be sufficient.

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 limit 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.



The Archaeological Service

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IP32 7AY

Phillip Isbell
Corporate Manager - Development Manager
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Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_4911
Date: 10 January 2017

For the Attention of Stuart McAdam

Dear Mr Isbell

Planning Application 4911/16 – Land adjacent to Wetherden Road, 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 (EWL 004, WDN 002, 011 and 013) and a Roman road possibly ran along the eastern edge of the development area (EWL Misc). A first phase of archaeological evaluation within the development area identified a Roman oven and features of Saxon date (EWL 037). As a result, there is high potential for the discovery of further 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 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

From: David Pizzey
Sent: 11 January 2017 09:48
To: Stuart McAdam
Cc: Planning Admin
Subject: 4911/16 Land adjacent to Wetherden Road, Elmswell.

Stuart

I have no objection in principle to this outline application subject to it being undertaken in accordance with the protection measures outlined in the accompanying arboricultural report. Although a single tree and a small section of hedgerow are proposed for removal these are of limited amenity value and their loss will have negligible impact on the appearance and character of the local area. If you are minded to recommend approval we will require a detailed Arboricultural Method Statement in order to help ensure the protective measures referred to are implemented effectively. This information can be dealt with as part of reserved matters or under condition.

Regards

David

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

James Platt

From: Sue Hooton, Principal Consultant Ecologist <Sue.Hooton@essex.gov.uk>
Sent: 28 June 2017 12:49
To: James Platt
Subject: RE: 4911/16 - Wetherden Road, Elmswell - revised ecology comments
Attachments: 001 letter sh - essex skylarks 4911 16.pdf

Hi James

No objection subject to securing ecological mitigation and enhancement measures

As discussed, further to my review of the additional information on skylarks submitted, I am now satisfied that there is adequate ecological information for determination. In addition to the mitigation measures detailed and reasonable biodiversity enhancements, I also suggest the additional measure of hedgehog friendly fencing throughout the development, to demonstrate the LPA's biodiversity duty under s40 NERC Act 2006.

The letter dated 9 Feb 2017 (attached) sent to me direct does not appear to have been submitted to the LPA but confirms that skylark are not likely to be affected by the development. There is therefore no requirement for a farmland bird mitigation strategy to be a condition of any consent.

Recommendations

Subject to the conditions below (based on BS42020 model conditions) in respect of biodiversity mitigation particularly for Protected and Priority species, I am satisfied that significant impacts on bats (European Protected Species) and farmland birds can be adequately controlled:

1. CONCURRENT WITH RESERVED MATTERS: RECOMMENDATIONS AS SET OUT IN ECOLOGICAL REPORTS (BIODIVERSITY MITIGATION AND ENHANCEMENTS)

"The development shall be carried out in accordance with the recommendations as set out in the Ecological Appraisal report (Ecology Solutions, Sept 2016) and Letter detailing skylark assessment (Ecology Solutions, 9 Feb 2017)."

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

2. CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

"No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;
a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED. All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority."

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

3. TIME LIMIT ON DEVELOPMENT BEFORE FURTHER SURVEYS ARE REQUIRED

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable."

INFORMATIVE: PROTECTION OF BREEDING BIRDS DURING CONSTRUCTION

"No removal of hedgerows, trees or shrubs shall take place in any phase of the development, between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority. "

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF, as well as the statutory obligations of the LPA.

Best wishes
Sue

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant at Place Services

Phone: 03330 322398 Mobile: 07809 314447
email: sue.hooton@essex.gov.uk / ecology.placeservices@essex.gov.uk
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From: James Platt [<mailto:James.Platt@baberghmidsuffolk.gov.uk>]
Sent: 30 May 2017 14:28
To: Sue Hooton, Principal Consultant Ecologist
Subject: 4911/16 - Wetherden Road, Elmswell

Hello Sue,

I have reviewed the attached information from the agent, including a response from yourself. Did you manage to send a formal response on this one? I can't see it on the system. Thank you.

Kind Regards,

James Platt
Planning Consultant
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724996
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24/01/2017

Dear Stuart,

RE: 4911/16 Outline Permission for development of up to 240 dwellings with associated works (vehicular, pedestrian, infrastructure, open space and landscaping). Land adjacent to Wetherden Road, Elmswell, IP30 9DG

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:

Habitats

The site north of Wetherden Road is bounded by hedgerows with trees on its northern, western, eastern and southern boundaries. As identified in the ecological survey report these areas offer nesting habitat for bird species and foraging and commuting habitat for bats species. From the site layout plan, it appears that the southern hedgerow of this parcel (along Wetherden Road) will be largely lost to the proposed development. We recommend that this hedgerow is assessed to determine whether it meets the criteria to be considered 'important' under the Hedgerow Regulations (1997), 'important' hedgerows should be protected from impacts by development. Hedgerows are also a UK and Suffolk Priority habitat and therefore any proposed loss should be fully quantified, assessed and adequately compensated.

Lighting

The consultant recommended 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 through 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 reports.

Skylarks

Dependent of crop rotation, the arable fields could provide suitable habitat for Skylark, a UK Priority Species and on the Red list of Birds of Conservation Concern. We would therefore recommend securing compensation through the use of skylark plots in the adjacent fields. These would compensate for the loss of potential nesting or foraging habitat (specification to match the Countryside Stewardship option AB4).

Hedgehogs

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 (with gaps of 13x13cm at ground level) as part of this development. For more information on this topic, see the

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Hedgehog Street website.

Ecological Enhancements

The proposed development offers the opportunity to provide ecological gains with the implementation of a detailed Ecological Enhancement and Management Strategy, which should be secured as part of any planning consent. Such enhancements could include, but are not limited to, integrated nesting habitats for birds (such as swifts and house sparrows); integrated roosting habitats for bats and as aforementioned, boundaries which are permeable to hedgehogs.

The proposed open space also offers the opportunity for ecological enhancement and should include planting with native species of local provenance. A long-term management plan for any open space and new or retained habitat (including appropriate financial contribution for works), such as an Ecological Enhancement and Management Strategy, as suggested in the Planning Statement, should also be secured as part of any planning consent. Such a plan should maximise the site's value for biodiversity in the long term.

Notwithstanding the above, we request that the recommendations made within the ecological survey 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

From: Nathan Pittam
Sent: 14 March 2017 09:39
To: Planning Admin
Subject: 4911/16/OUT. EH - Land Contamination

M3 : 188544

4911/16/OUT. EH - Land Contamination.

**Land adjacent to, Wetherden Road, Elmswell, BURY ST EDMUNDS, Suffolk.
Outline planning permission for the development of up to 240 dwellings with
associated works including vehicular and pedestrian accesses, pedestrian
links, infrastructure, open space, landscaping ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and the supporting Phase I desk study by the Nott Group which concludes that additional investigation are required to assess the risks from offsite sources and the presence of a small refuse tip within the development envelope. I therefore have no objection to the proposed development provided that the attached condition is included with any permission that may be granted for the site in accordance with the recommendations of the developers consultants.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
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From: David Harrold
Sent: 08 January 2017 15:17
To: Planning Admin
Cc: Stuart McAdam
Subject: Plan ref 4911/16/OUT Land adj Wetherden Road, Elmswell. EH - Other Issues

Thank you for consulting me 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.

The report concludes that the assessment of noise levels, principally from road traffic sources and occasionally noise from Lawn Farm Quarry, are not significant and no noise mitigation measures are necessary.

I can concur with this conclusion and do not have any adverse comment or objection to the proposed development.

David Harrold MCIEH

Senior Environmental Health Officer
Babergh and Mid Suffolk Council

From: Iain Farquharson
Sent: 24 April 2017 09:55
To: Planning Admin
Subject: M3 188541. sustainability statement received for Planning Application 4911/16

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)

This is a major application of 240 dwellings for which the carbon, energy and sustainability issues will be significant. It is very likely 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 permission is granted. This department would expect a large development such as this to exceed the standards of Part L part G etc.

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

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Consultation Response Pro forma

| | | | |
|----------|---|--|--------------------------|
| 1 | Application Number | 4911/16 | |
| 2 | Date of Response | 20/01/17 & 11/05/17 | |
| 3 | Responding Officer | Name: | Hannah Bridges |
| | | Job Title: | Waste Management Officer |
| | | Responding on behalf of... | Waste Services |
| 4 | Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | No objection | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | We have no objection to proposed development. However we would require more detail on the road widths on the construction of the shared access drives and information of the construction of the road to make sure it is suitable for dustcarts to manoeuvre on. | |
| 6 | Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate | | |
| 7 | Recommended conditions | Bin presentation points to be marked on the map. | |

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