

4 PLANNING PERMISSIONS AND APPLICATIONS

4.1 Summary of Existing Planning Application(s)

- 4.1.1 An outline planning application for a ‘mixed use development to provide up to 1,100 new homes, up to 3.44 hectares of new serviced employment land, school, local neighbourhood shops, health centre, crèche, elderly care home, recreation and sports space, car and cycle parking and landscaping and associated works’ has been received by Babergh DC for **The Site**.
- 4.1.2 However, this application is currently at appeal having initially been refused by the Council, as **The Site** is currently allocated for general employment within the adopted Babergh Local Plan 2006, and the Council considers it to be strategically important employment land, due to its unique location and existing transportation links.
- 4.1.3 The following sections provide an analysis of key issues concerned with the submitted documentation for a residential led “mixed use” scheme known as the “Broadmeadows” scheme. It is noted that the existing land uses, strategic importance and site characteristics all ensure that **The Site** is more appropriately delivered for employment use.

4.2 Environmental Characteristics

- 4.2.1 It is clear that the former use of **The Site** for British Sugar’s activities has left a legacy of contamination. A review of supporting environmental contamination documentation accompanying the recent planning application for **The Site** has been undertaken as is contained in Appendix 3. Further site geotechnical surveys are required prior to any conclusive remediation costs being identified. Appendix 8 Figure 1 also confirms that the entire site lies within the flood plain which heightens the importance of clarifying the existing contamination and any point source pollution to ground and surface waters. Location within the indicative flood zone also provides greater requirements for drainage regimes and site protection measures for any significant infrastructure and development (houses, rail, etc).

4.3 Review of the Budget Cost Comparison

- 4.3.1 The aim of the Gleeds “Cost Plan No.1 For: JG Ipswich LLP Mixed Use Development” 7 June 2006 and “Budget Cost Comparison – Mixed Use and Employment Developments” report is to outline the difference in capital cost of the works for a mixed use scheme and an employment scheme at **The Site**.
- 4.3.2 The budget cost comparison undertaken identifies six main cost areas namely site preparation, transport infrastructure off site, transport infrastructure on site, services infrastructure off site, services infrastructure on site and landscaping. These are then subdivided into various items. However, too little detail is provided on each item to enable a critical or like-for-like comparison, i.e. relatively little information is provided relative to the build-up of these costs has been provided.

4.3.3 However, the individual cost items relative to various aspects of site preparation including remediation and sewerage are discussed as follows:

Site Preparation

4.3.4 The only item under this heading which differs between the mixed use and employment scheme is remediation. Demolition (above & below ground) and earthworks modelling are all considered to be the same cost irrespective of the scheme type. This is plausible but would undoubtedly be subject to the scheme layout.

4.3.5 Remediation costs for mixed use were quoted at £322,986 whilst the cost is £306,837 for an employment scheme. Gleeds note that a slightly lower standard is acceptable but that only a small impact on cost would be expected. As such, remediation costs relative to the employment scheme cost have been lowered by 5%.

Based on our experience typical measures required for both schemes may include the following:

Residential Led Use		Commercial End Use	
Remediation Measure	Requirement	Remediation Measure	Requirement
Capping layers across The Site and in garden & landscaped areas	<ul style="list-style-type: none"> - <i>Provision of up to 1m thick of clean soil in garden & landscaped areas.</i> - <i>Tarmac or concrete hardstanding in car parking.</i> - <i>Reuse of factory soil / sludge should be appropriate to a residential land use scenario (i.e. reuse criteria should be suitable)</i> 	Capping layers across The Site and in landscaped areas.	<ul style="list-style-type: none"> - <i>Tarmac or concrete hardstanding in majority of site.</i> - <i>Provision of 400-600mm of clean soil in landscaped areas.</i> - <i>Reuse of factory soil / sludge should be appropriate to a commercial land use scenario (i.e. reuse criteria should be suitable). This is less a sensitive land use than residential.</i>
Gas protection measures.	<ul style="list-style-type: none"> - Appropriate floor slab construction. - Gas protection membranes. - Removal of highly volatile source areas. - <i>There may be a requirement to install barriers or at least monitor gas migration from closed landfills.</i> 	Gas protection measures.	<ul style="list-style-type: none"> - Appropriate floor slab construction. - Gas protection membranes. - Removal of highly volatile source areas. - <i>Provision of barriers around closed landfills may not be required subject to risk assessment.</i>
Demolition requirements	<ul style="list-style-type: none"> - Removal of all structures which might impact upon garden areas. 	Demolition requirements.	<ul style="list-style-type: none"> - Some below ground structures may be left in place if they do not pose a risk to controlled waters.
Remediation to reduce risks to groundwater (include soil excavation, monitoring or active treatment)	Could include soil excavation, monitoring or active treatment.	Remediation to reduce risks to groundwater (include soil excavation, monitoring or active treatment)	Could include soil excavation, monitoring or active treatment.

Table 4-1 Commentary on Site Costs

- 4.3.6 Those items in *red italic* above are the items where requirements for commercial end use would differ to residential end use which principally relates to human health.
- 4.3.7 The main additional costs associated with residential use include the importation of clean suitable soil and topsoil for garden areas compared with mainly hardstanding for commercial use. Also, depending on the gassing potential at **The Site**, stricter measures may be required to prevent migration / accumulation of gas in residential properties and may even prevent residential development in certain areas (see below).
- 4.3.8 However, it should be borne in mind that there is little information on the comparison criteria for reuse of sludge and factory soil at **The Site**. If this material has been compared to a commercial standard then reassessment would be required to determine the appropriate standard for residential use. The more stringent requirements for residential use may mean that some of the already reused material may require treatment or disposal off site. This would result in additional cost (essentially double handling) which could be quite significant, particularly if material is classed as hazardous and requires pre-treatment, and therefore have a marked cost differential. Details on

the assessment criteria used to determine reuse of fill material are necessary to understand the current status of **The Site**.

- 4.3.9 In addition, the assessment behind the conclusion that remedial works were not considered necessary for some areas (e.g. Loco shed etc.) is not clear. If this assessment assumes a commercial end use then this would need to be reassessed to determine if works are required for a residential land use (e.g. removal of soils may be necessary in addition to capping).
- 4.3.10 In their assessment, Gleeds have reduced costs for landscaping for an employment scenario by 25% due to a “lower spec and no provision of sports fields”. However, the definition of what is included as landscaping is not very clear. If landscaping relates only to soft landscaping works and not the provision of hardstanding and car parking, the cost associated with commercial use seems high compared to the mixed use, residential led, scenario. Alternatively, the cost for capping may be included in the ‘remediation’ item.
- 4.3.11 Aside from the above measures, guidance on development on and near landfill sites should be considered, e.g. Waste Management Paper 27 in addition to consultation with the Environment Agency. Waste Management Paper 27 states that agricultural land use and public open space are the most suitable use of former landfills and that domestic housing should not be built on gassing landfills. This reference also states that developments within 250m of a landfill (irrespective of its status) should undertake appropriate risk assessment and risk management to protect occupants. The Town and Country Planning (General Development Procedure) (Amendment) (England) Order 2005 requires the Local Authority to consult with the Environment Agency (EA) before granting planning permission for developments within 250m of a landfill. It is considered that full assessment of the gas regime at **The Site** would be required.

Sewerage

- 4.3.12 Off site sewerage infrastructure costs indicated in the Gleeds cost plan for both the residential led and employment scheme indicate £2.1m is required to install a new pumping station and riser to the Chantry Vale station.
- 4.3.13 Clearly a commercially driven scheme will have a significantly lower requirement for waste water/sewerage than a residential scheme with 1100 additional homes. However, for clarity we have identified that the peak flow generated by 1100 residential properties is estimated (in accordance with Sewers for Adoption) to be 51 l/s requiring a 200mm to 250mm diameter rising main. In respect of this volume of and peak flow generation and accordance with Sewers for Adoption, the proposed pumping station identified in the Gleeds Cost Plan would require a storage volume of approximately 190m³ below the incoming pipe.
- 4.3.14 This is compared to the proposed employment of 100 FTE’s (Full Time Equivalent) on **The Site** through B2 or B8 use classes which would generate equivalent peak flows of 1.3 l/s which may be a comparable estimate of loading during operations of the British Sugar site prior to closure in 2001. In this respect, existing services could be used (existing 12” AC Main) or foul sewerage could be pumped to a sewer on Sproughton Road. For such a proposal, a pumping station with a storage volume of 5m³, macerating

pumps and a 50mm diameter rising main of approximately 300m would cost in the order of £90,000.

- 4.3.15 Additional connection fees to both water and sewerage are required for any circumstance, however it is clearly demonstrated that the over-arching £2.1m expenditure for capital works in this regard requires further justification and is likely to decrease in cost as the result of an employment led scheme whereby peak flows are likely to be one-tenth of the volume.

Summary

- 4.3.16 In summary, it is not possible to make a further reasonable judgement on the costs provided for both scenarios due to the lack of information provided not only on what work has been undertaken to date but also on what work is proposed to meet the requirements for both land uses. In addition, no detail is provided on what the items in the cost comparison allow for.