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Date: 14<sup>th</sup> April 2022

Dear Sir/Madam,

**Subject: Proposed Re-provision of Single Living Accommodation (SLA) – Wattisham Flying Station: Request for Environmental Impact Assessment Screening Opinion under Regulation 6(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended**

Arcadis has been appointed to undertake the EIA Screening for the redevelopment of Wattisham Flying Station on behalf of The Defence Infrastructure Organisation (DIO). As part of its Army Infrastructure Programme, the Defence Infrastructure Organisation (DIO) (hereafter referred to as 'the Applicant') is proposing to demolish an existing SLA block and provide replacement accommodation with at least the equivalent capacity on the same plot within the MoD Wattisham Flying Station, Suffolk. The total area of the Proposed Scheme is approximately 0.5 hectare (ha). The proposed works are hereafter referred to as the 'Proposed Scheme'.

Under the provisions of Regulation 6(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (hereafter referred to as the 'EIA Regulations') we request that Mid Suffolk District Council as the Local Planning Authority, adopt a Screening Opinion confirming whether the construction and/or operation of the Proposed Scheme, as described in this letter and enclosures, constitutes EIA Development.

Whether a project is subject to EIA depends on if it is listed in Schedules 1 or 2 of the EIA Regulations. EIA is mandatory for Schedule 1 Developments. EIA is required for a Schedule 2 Development that is likely to have significant impacts on the environment by virtue of factors such as its nature, size and location.

A project of this nature, involving the construction of a new urban development, is outlined in the EIA Regulations, under Schedule 2 'Infrastructure Projects', paragraph 10(b) – 'Urban

development projects, including the construction of shopping centres and car parks, sport stadiums, leisure centres and multiplex cinemas’.

The following thresholds and criteria are also provided:

- (i) *The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) *the development includes more than 150 dwellings; or*
- (iii) *the overall area of the development exceeds 5 hectares.*

In relation to the thresholds for Schedule 2 paragraph 10(b) ‘urban development project’ the Proposed Scheme would exceed 150 dwellings with 168 bed spaces provided, however it would not exceed 1 hectare of urban development and/or 5 hectares of overall development area. However, in exceeding the dwelling threshold of 10(b) the Proposed Scheme has been screened to establish if it should be subject to an EIA. Further assessment and investigation has been undertaken as presented within this EIA Screening Request.

### **EIA Screening**

Schedule 3 of the *EIA Regulations* provides details of the selection criteria for screening Schedule 2 developments and identifies three broad criteria which should be considered:

- The environmental sensitivity of the location;
- ‘The characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated); and
- The characteristics of the potential impact.

These criteria are considered in more detail in the following sections of this letter.

In addition, in accordance with Regulation 6 of the EIA Regulations, this letter and enclosures, provides:

- A plan sufficient to identify the land;
- A description of the of the physical characteristics and development location in regard to the environmental sensitivity of geographical areas likely to be affected; and
- Such other information or representations as the person making the request wishes to provide or make.

In order to assist Mid Suffolk District Council in adopting a Screening Opinion, this letter includes a brief description of the nature and purpose of the Proposed Scheme and its potential impacts upon the environment. In addition, we enclose a Location Plan (Figure 1) and an Environmental Constraints Plan (Figure 2) to show the results of database searches of key environmental designations and receptors.

### **Purpose of the Proposed Scheme**

The Army has recognised that large parts of its estate are in poor condition and is committed to addressing substandard accommodation as a priority. Substandard accommodation has a negative effect on the retention of Service Personnel and is damaging to the reputation of the Army and DIO.

The Proposed Scheme comprises the demolition of existing poor-quality junior officer accommodation (block 314) and the provision of a new accommodation block with at least equivalent capacity on the same plot of land (hereafter referred to as the ‘site’).

The Proposed Scheme seeks to push the boundaries in terms of sustainable building design. An upgrade is required to ensure building design exceeds current Near Zero Carbon building standards (BPS 0.1 Version 4). The project therefore provides an opportunity to upgrade the building to reflect emerging sustainable design standards.

### **Location of the Proposed Scheme**

The Proposed Scheme is located within the Wattisham Flying Station, Suffolk. The Proposed Scheme would be centred on British National Grid (BNG) grid reference TM 03323 51568. The site of the Proposed Scheme comprises an existing SLA and 35 parking spaces. It is anticipated that the site would be accessed from an unnamed road to the south.

The nearest residential areas to the Proposed Scheme are the villages of Great Bricett and Ringshall Stocks, which are located approximately 0.9km to the south-east and 1km to the east respectively (as shown on Figure 2).

In terms of topography, the central courtyard has a central low point that generally falls northwards towards the access road to the north. The levels in the surrounding roads fall with a slope (1:60) from south west (86.0m AOD) to north east (84.3m AOD). The existing building sits at 86.0m AOD and is up to 1.5m higher than the roads surrounding it.

### **Characteristics of the Proposed Scheme**

The Proposed Scheme is for residential accommodation in an existing Barracks site and therefore the proposed land use is unchanged from the baseline provision.

The Proposed Scheme comprises the demolition of the existing SLA block 314 (4 storeys in the central wing, 3 storeys with regards to the east and west wings) which contains 168 bed spaces with the construction of a Junior Ranks SLA with at least equivalent capacity on the same plot of land. The total area of which is 0.5ha. The red line boundary of the Proposed Scheme is as shown on Figure 1 and Figure 2 included within this screening request.

As part of the Proposed Scheme, the newly constructed Junior Ranks SLA building would be up to 4 storeys high, constructed in a 'U' shape and would include cooking facilities and wheelchair access. The building would measure 16.7 metres in height with an additional 2 metres rising above this in the form of a small roof pop-up area. As noted in the Pre-application advice dated 27<sup>th</sup> January 2022, the proposed scale and form remain broadly the same as the existing building which is to be demolished.

It is not proposed to provide any additional parking in association with the Proposed Scheme. Any junior officers staying within the accommodation would be expected to utilise the existing parking provision. New footpaths would be provided to link the accommodation block with the adjacent footpath network. A single enclosed cycle store which can accommodate 32 bicycle lockers (1 bicycle per locker) would be provided within the red line boundary.

In terms of waste generation, in line with the waste hierarchy by prioritising prevention, a design out waste workshop would take place and would inform the design of the Proposed Scheme.

## **Construction Best Practise**

It is proposed that the existing SLA would be demolished before the new block could be constructed on the same plot of land.

The construction phase is anticipated to be approximately 1 year and 10 months. During construction, welfare facilities, site offices and temporary site compounds could be located on site. Construction working hours would be agreed with Mid Suffolk District Council and due to the close proximity of residential receptors within the barracks, the Applicant would seek to avoid construction working during anti-social hours (e.g. weekday evenings and during weekends).

Construction works would be undertaken in accordance with best practice and mitigation discussed with Mid Suffolk District Council. Any mitigation would be outlined within a Construction Environmental Management Plan (CEMP) which would be required and secured via a planning condition. The CEMP would include reference to guidance (or similar if superseded by the time that construction commences) such as:

- Guidance for Pollution Prevention (GPPs) – environmental good practice guidance for the UK: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>
  - GPP 1: Understanding your environmental responsibilities - good environmental practices
  - GPP5: Works and Maintenance in or Near Water
- Construction Industry Research and Information Association (CIRIA) guidance e.g., C741 – Environmental Good Practice on Site (Fourth Edition, 2015); and
- Construction Industry Publication (CIP) Construction Environmental Manual.

## **Key Environmental Considerations**

The site is not located within a 'sensitive area' as defined by the EIA Regulations. There are no statutory designated ecological sites, including international designations, within 2km of the site. There are no World Heritage Sites within 1km of the site. The closest Scheduled Monument is located within 1km of the site, however as explained in the Cultural Heritage Desk-Based Assessment, it is considered that the Proposed Scheme will not have an adverse effect on the setting of this asset, due to the distance and limited/no visibility between the Proposed Scheme.

As noted in the Arboricultural Report, it was confirmed by the local planning authority that no trees surveyed are subject to Tree Preservation Order (TPO) or Conservation Area restrictions. In addition, it was confirmed that there are no designated ancient woodlands or veteran trees within the survey area.

## **Potential Impacts on the Environment**

The following section outlines potential sensitive receptors and environmental effects of the Proposed Scheme during construction and operation.

### **Ecology and Biodiversity**

A Preliminary Ecological Appraisal (PEA) report has been prepared by Arcadis Consulting (UK) Ltd to identify any ecological constraints associated with the Proposed Scheme and



inform the design process by outlining appropriate mitigation measures and biodiversity enhancement recommendations. The PEA report presents the results of a desk study and an extended Phase 1 habitat survey within the site boundary as shown on Figure 1.

Taking into account the findings of the PEA report (summarised below) and assuming that the further survey work proposed is undertaken and that the recommended mitigation is implemented, it is considered that the Proposed Scheme is unlikely to give rise to any potential significant adverse effects on ecological receptors.

### Designated Sites

There are no statutory designated sites of nature conservation importance located within 2km of the site.

The desk study identified three County Wildlife Sites (CWS) which are non-statutory designated sites within the 2km search area. The closest CWS is RAF Wattisham Woodlands that is located approximately 200m to the north of the site boundary. It is not anticipated that these sites would be affected by the proposals due to the small-scale nature of the works and the lack of impact pathways. There are no other designated nature conservation sites within 2km of the site.

### Habitats

The site is located within an existing Royal Air Force (RAF) base and comprised buildings surrounded by amenity grassland with scattered broadleaved trees and introduced (non-native/ornamental) shrubs. The site is bordered by open green space and military housing to the east with other buildings and associated areas of hardstanding, scattered trees and amenity grassland elsewhere.

The site is dominated by one disused four-storey accommodation block with bare brick walls and a pitched tiled roof.

None of the habitats present within the site represent Habitats of Principal Importance in England (HPIE). Two HPIE were identified within the 2km search area; these are deciduous woodland (0.80km south-west of the site) and traditional orchards (1.3km east of the site).

### Potential for protected and notable species

The key findings are outlined below.

#### *Birds*

The desk study returned 114 records of 33 species of bird. Of these, four species are listed under Schedule 1 of the Wildlife and Countryside Act 1981 and 12 are priority species within the UK. The closest recorded bird was dunnoek (*Prunella modularis*) found 0.48km south.

The field survey found that the site contained suitable habitat for nesting and foraging birds. This included trees and built form. Evidence of nests at the top of the external walls was observed in multiple places on the building, likely built by swallow (*Hirundo rustica*). There was also a frequent perching site for kestrel (*Falco tinnunculus*) behind a vertical pipe on the south side of the building, as evidenced by droppings and a large pile of pellets on the ground below.

Based on the size of the site and habitat quality, the site was considered unlikely to support a significant assemblage of breeding or foraging birds, though some active nests are likely to be present in the main breeding season (between early March and late August).

### *Bats*

The desk study returned 5 records of four species of bat within the 2km search area.

There are no records of existing bat licence applications within 2km of the site.

A Preliminary Roost Assessment was undertaken, and key findings are set out below. The existing building on site had gaps into the soffit and open vents where covers were missing, facing multiple directions. There were also open windows on the upper floors of the building. It is therefore assumed that bats could access all spaces within the building. It was classified as having a high level of suitability for roosting bats in accordance with BCT guidelines<sup>1</sup>. No signs of use by bats were observed.

None of the trees on site were found to have any potential roosting features suitable for use by bats.

Most of the site comprises hardstanding and the building with few trees. These habitats were unlikely to represent significant resources for foraging bats. The areas within the site may still be used for dispersal by bats despite the lack of foraging opportunities, though there was a lack of connection to foraging habitats in the wider landscape beyond the site. Overall, the habitats within and adjacent to the site were assessed as having low suitability for foraging bats in accordance with BCT guidelines.

### *Other species*

The desk study returned no records of amphibians, reptiles, fish, hazel dormouse, Eurasian otter, water vole and badger within the 2km search area. The field survey recorded that there was no sign of these species on site or that no suitable habitat was present on site.

The habitats within the site were mostly intensively managed so may be used for foraging badger, but it is unlikely that badger would create setts in the area.

The desk study returned 11 records of hedgehog (*Erinaceus europaeus*) within the search area, one record being within the site. The field survey identified no signs of hedgehog but noted that the areas of introduced shrub could be suitable for breeding and hibernation nests.

The field survey recorded no protected or notable plants within the site and the habitats on site were unlikely to support protected or notable species.

### *Non-native invasive species*

The desk study returned six records of five species of invasive non-native species within 2km of the site. They are all listed as invasive under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended)<sup>2</sup>. The closest record was for Canada goose (*Branta canadensis*) found 0.98km north-west from the site.

The field survey recorded no invasive non-native species within or immediately adjacent to the site.

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<sup>1</sup> Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd ed.). The Bat Conservation Trust, London.

<sup>2</sup> HMSO (1981). *The Wildlife and Countryside Act 1981 (as amended)*. [online] Available at: <https://www.legislation.gov.uk/ukpga/1981/69/contents> [Accessed September 2021].

## Conclusions

### *Further survey work*

The presence of bat roosts associated with the building onsite would need to be established as it is due to be demolished. An internal loft inspection and at least three nocturnal dusk emergence and / or dawn re-entry surveys would need to be undertaken using an appropriate number of surveyors for adequate coverage. Should this survey effort detect presence, additional survey effort may be required.

### *Mitigation*

**Birds:** Tree-nesting birds are likely to use the trees and shrubs within the site. Breeding birds are also likely to use the building itself. Where practicable, any tree/hedgerow removal or management, and works affecting the building, would avoid the main breeding bird season (March to August inclusive). If this is not possible, a check for nesting birds would be conducted (by a suitably qualified ecologist) prior (within 48 hours) to works commencing. Checks for nesting birds, vegetation clearance and demolition would be detailed in a Method Statement. This is to ensure no offences are committed under the Wildlife and Countryside Act 1981 (as amended).

**Bats:** The habitats adjacent to the site were considered suitable for foraging and commuting bats. To avoid disturbance to foraging and commuting bats during construction works, night working would be avoided as far as practicable during the active season for bats (April to October inclusive). If night working is required during the active season, then lighting would be task-focussed to avoid light spill into adjacent retained habitats. Any new operational lighting would be minimised and sensitive to direct spill away from features that may be used for roosting, foraging and commuting. LED lights have been demonstrated to be of lower impact to bats and these would be favoured over those which result in extensive light spill and emit at high lux values.

Further survey effort on the building on site is required. If no bats or evidence of bats is recorded, then specific mitigation measures would not be required, although contractors would need to be made aware of appropriate steps to take in the unlikely event that bats are encountered.

If further survey effort records roosting bats, then the level of mitigation would depend on the species encountered, its conservation status, the level of use, number of animals and the physical characteristics of the roost(s). Since removing a bat roost would contravene current wildlife legislation, the developer or Principal Contractor would first need to obtain a mitigation licence to legally facilitate the work. Licences are currently issued by Natural England. Ultimately, the loss of bat roosts would need to be compensated for by incorporating replacement features into new or existing buildings / trees nearby.

**Badger:** Excavations during construction should be covered at night, or a ramp provided, to ensure that foraging badger have an effective means of escape if they fall in overnight.

**Other mammals:** Precautionary clearance methods would be applied to avoid harm to hedgehog that could be present. Between March and October, removal of suitable refuges and potential hibernation sites would take place by hand, where practicable and safe to do so, under a Method Statement and be overseen by a suitably qualified ecologist. For vegetation clearance, a careful two-stage cut is recommended. This would involve the use of hand tools (chainsaws, brush cutters and strimmers), following an initial check by a suitably qualified ecologist, to reduce vegetation height in stages over several days, enabling animals to disperse. From November to February, potential hibernation sites, including leaf litter, would

be hand searched by an ecologist or left undisturbed until the end of the hibernation season. Clearance of vegetation would take place under ecological supervision following an ecological Method Statement.

## **Arboriculture**

An Arboricultural Survey has been undertaken by Arcadis Consulting (UK) Ltd. An Arboricultural Report has been produced and will be submitted along with the planning application.

The arboricultural survey found that there was a total of 34 arboricultural features within the study area as follows:

- 10 individual trees were graded as Category B (moderate quality)
- 20 individual trees and 4 hedgerows were graded Category C (poor quality)

It was confirmed by the local planning authority (LPA) that no trees surveyed are subject to Tree Preservation Order or Conservation Area restrictions. It was also confirmed that there are no designated ancient woodlands or veteran trees within the survey area.

Should the future Proposed Scheme require tree removal or construction works within Root Protection Areas of retained trees, an Arboricultural Impact Assessment would be required by the LPA in support of a planning application.

Should tree removal be required as part of the proposed works, specific details regarding replacement tree planting should be prepared by a suitably qualified and experienced landscape architect as part of a landscape scheme.

Any new tree planting should be undertaken in accordance with British Standard 8545:2014 Trees: From Nursery to Independence in the Landscape – Recommendations and all tree works must be carried out by a qualified contractor in accordance with BS3998:2010: Tree Work – Recommendations.

A Preliminary Arboricultural Method Statement (AMS) has been prepared as part of the Arboricultural Report, outlining tree protection measures. However, following planning determination and when full construction measures are known, a bespoke AMS may be required to ensure protection of the trees to be retained on and adjoining the site.

Taking into account the above, it is considered unlikely that the Proposed Scheme would give rise to any significant adverse effects on arboricultural features.

## **Flood Risk and Drainage**

Cundall has prepared a Flood Risk Assessment, which also includes a summary of the drainage strategy for the Proposed Scheme, setting out the key principles to be followed. An overview of the Flood Risk Assessment is provided below.

### *Flooding from Rivers and Sea*

A review of the Environment Agency flood risk mapping (via GOV.UK) and the Envirocheck flood maps shows that the site is located within an area that has a 'low' probability of river or sea flooding (Flood zone 1). Flood zone 1 equates to land that has been assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). Fluvial and tidal flooding therefore do not pose a constraint to the Proposed Scheme.

### Flooding from Surface Water

The Proposed Scheme is unlikely to increase surface water flood risk, as the site currently comprises an existing SLA block and hardstanding which is used as a car park and the landuse is not changing from its current form. It is noted in pre-application advice (dated 27<sup>th</sup> January 2022) that ‘... *the impermeable area of the original building is not being increased...*’

The Proposed Scheme is located within an area that is at ‘very low’ risk of surface water flooding. While the southern boundary of the site is at medium risk of surface water flooding.

However, the Envirocheck: JBA 1000 Year Return Flood Map (see Appendix G of the Flood Risk Assessment (FRA) submitted alongside the planning application) shows that the site is at risk of 0.1-0.3m (flood depth). The FRA interprets this as a modelling anomaly as it does not align with the EA/Envirocheck mapping or with the levels across the site.

A FRA (including a summary of the drainage strategy) will be submitted as part of the planning application submission to demonstrate that surface water runoff from the site would be suitably managed in line with national and local requirements, so that the Proposed Scheme does not result in increased flood risk off-site. It is concluded in the FRA that the overall surface water flood risk is low.

### Flooding from Groundwater

The Groundsure Enviro and Geo Insight Groundwater flooding map (13<sup>th</sup> August 2021) shows that the site is at low risk of groundwater flooding. As there are currently no plan to construct basements or partially buried areas as part of the Proposed Scheme, the probability and impact of any groundwater flooding occurring on site would be considered low. It is considered that this source of flooding does not pose a constraint to the site’s development, and no significant effects are anticipated during construction and/or operation.

### Drainage

#### *Existing drainage*

There is currently no information available on the details of the existing drainage within the site. A full closed-circuit television (CCTV) survey within the Proposed Scheme site area would need to be conducted to identify the size, level, and capacity of the existing drainage so that an assessment of the flood risk can be undertaken. As a result, the flood risk associated with the on site drainage is defined as ‘to be confirmed’ upon receipt of further survey information.

#### *Proposed drainage*

The proposed drainage strategy for the site would be designed in accordance with the relevant design standards, industry guidance and government guidance.

In the event that the surface water discharge from site is required to be restricted to greenfield run-off rates, the use of Sustainable Drainage Systems (SuDS) would be necessary to attenuate and slow down surface water flows during storm events.

The capacity of any proposed drainage system would be set to ensure no flooding occurs in a 1 in 30 rainfall event and any flooding from a 1 in 100 (+40% allowance for climate change) rainfall event would be contained within the site boundary and would not flood any buildings.

A robust drainage maintenance strategy would ensure risk of flooding from any proposed drainage system would be low.

Before detailed design work commences on a surface water drainage design for the Proposed Scheme, testing should be carried out on site to determine the presence of contaminants within the ground at the site. In the event that there are no leachable contaminants that could pose a risk to groundwater, soakaway testing should be carried out in accordance with BRE365<sup>3</sup> to determine the infiltration rate at the development site. The infiltration rate of the site ground conditions, and an assessment of the runoff quality would need to be verified before proposing the use of specific infiltration SuDS.

## **Landscape, Townscape and Cultural Heritage**

### Landscape and Townscape

There are no Areas of Outstanding Beauty (AONB) or National Parks within 5km of the Warrisham Flying Station. There is one statutory designated heritage site within 1km of the site, namely, a Scheduled Monument - Great Bricett moated site located approximately 880m south east of the Proposed Scheme. There are no non-statutory designated heritage assets within 1km of the site, i.e. Registered Battlefields and Registered Parks and Gardens. The nearest Conservation Area is Naughton Conservation Area which is located approximately 2.5km south-west of the Proposed Scheme. The nearest Special Landscape Area is located approximately 1.5km north-east of the Proposed Scheme.

The height of the proposed SLA is intended to be no more than 3 storeys, which is largely in keeping with the height of the surrounding buildings within the flying station and the existing SLA block within the site boundary. The site of the proposed SLA is surrounded by other Army buildings and infrastructure. A playground is located in close proximity to the eastern site boundary. The adjacent areas bordering the site are allocated for either domestic use or family housing. The surrounding area beyond the flying station boundary is largely agricultural land with some commercial uses. A caravan site and a business park are located approximately 400m south-east of the site. A sewage works is located approximately 460m east of the site.

The Proposed Scheme would not result in significant adverse visual effects. An existing SLA currently occupies the site as well as hardstanding used for parking. The nearest residential areas are Great Bricett and Ringshall Stocks, which are located approximately 0.9km to the south-east and 1km to the east respectively with intervening buildings and vegetation present, which would provide visual screening of the Proposed Scheme.

The siting, scale and massing of the Proposed Scheme would be discussed further in the Design and Access Statement to be submitted with the planning application.

The pre-application document issued by the local planning authority (ref: DC/21/06444) states that there are no Public Rights of Way (PRoW) on or near to the site. It is therefore expected that no PRoWs would be affected by the construction of the Proposed Scheme.

In light of the above, the Proposed Scheme would not give rise to significant landscape and visual effects.

### Cultural Heritage

It is unlikely that the Proposed Scheme would give rise to significant heritage effects, however the (below-ground) archaeological value of the site is currently unknown. A cultural heritage desk-based assessment (DBA) report has been prepared and will be submitted as part of the planning application. This DBA report concludes that taking into account the amount of

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<sup>3</sup> BRE365 (2016) Soakaway design. Available at: <https://www.brebookshop.com/details.jsp?id=327631>

development that has been undertaken within the site, including how the footprint of the current SLA Block 314 occupies the majority of the site, it is considered that any archaeological remains within the site, if any were present, would have been truncated/ entirely removed during the construction of the existing building.

The closest designated heritage asset comprises the Great Bricett moated site Scheduled Monument (List Entry Number: 1006048) (SM1), which is recorded c. 895m to the south of the site. Due to the distance and there being limited/no visibility between the Proposed Scheme, the scheduled monument mentioned above and the nearest listed buildings (which are located just over 1km from the site), it is considered that the Proposed Scheme would not have an adverse effect on the setting of these assets. A setting study was therefore not produced as part of the DBA report.

Advice received from the Council's Heritage Team at the pre-application stage (dated 27<sup>th</sup> January 2022) is that the existing SLA '*...makes no real contribution to the heritage significance of the airfield, and its removal would have neutral impact. Similarly, the proposed replacement building would have no particular impact in heritage terms, and would not result in heritage harm. The [Heritage Statement] submission includes a thorough appraisal of potential heritage impact; in my view its findings are sound, and the document should accompany any subsequent application.*'

### **Air Quality, including Dust**

The Proposed Scheme is not located within an Air Quality Management Area (AQMA). The nearest residential receptors are those situated within the flying station site itself. There are no statutory designated ecological receptors sensitive to dust within 500m of the site.

During the construction phase of the Proposed Scheme, there is the potential for dust emissions from activities such as demolition, earthworks, construction and track out activities. Should any Non-Road Mobile Machinery be utilised on-site during the construction works, this would comply with the relevant emission standards, thereby minimising emissions.

The dust impact assessment contained within the Air Quality Assessment report prepared by Cundall concludes that in the absence of appropriate mitigation, there is a medium risk from the earthworks, construction, demolition and track out dust-generating activities associated with the Proposed Scheme. However, with appropriate mitigation measures implemented (construction mitigation measures are set out in the report), it is anticipated that the dust generation and harmful emissions from construction site activities would not be significant.

It is noted in the Air Quality Assessment report that the Applicant has committed to the implementation of the best practice construction mitigation measures identified in the report. These measures have been proposed in accordance with the Institute of Air Quality Management (IAQM) 'Guidance on the assessment of dust from demolition and construction'<sup>4</sup>. It is anticipated that a Construction Environmental Management Plan (CEMP) would be required and secured by a planning condition. This would need to conform to Babergh and Mid Suffolk Council's planning requirements and be agreed with the Local Planning Authority prior to commencement of works.

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<sup>4</sup> Institute of Air Quality Management (IAQM) (2016) Guidance on the Assessment of Dust from Demolition and Construction (Version 1.1) <https://iaqm.co.uk/text/guidance/construction-dust-2014.pdf>

With regards to the operational phase, the Proposed Scheme does not comprise combustion plant such as boilers and combined heat and power, and therefore an assessment of combustion source emissions was scoped out of the assessment.

With regards to the air quality conditions for future residents of the Proposed Scheme, the assessment concluded that predicted concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are likely to meet national air quality objectives at all building facades, therefore no specific mitigation is required. In addition, it was concluded that the Proposed Scheme would be naturally ventilated with openable windows being used for comfort cooling. Under these conditions, it is anticipated that the exposure of future occupants to poor air quality would be unlikely.

No additional car parking is proposed as part of the Proposed Scheme. The change in light duty vehicle (LDV) flows during operation is therefore anticipated to be well below 500 Annual Average Daily Traffic (AADT) movements, the threshold value at which the EPUK/IAQM<sup>5</sup> predicts significant impacts are likely to occur for developments not located in AQMAs. The predicted impact on NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations is therefore considered to be negligible at all nearby receptors.

An Air Quality Assessment report prepared by Cundall will be submitted as part of the planning application submission. The report provides a review of baseline conditions and includes a dust impact assessment and an operational phase impact assessment. Appropriate mitigation measures are proposed, as necessary.

In summary, air quality effects arising from the Proposed Scheme are not likely to be significant.

### **Ground Conditions and Contamination**

A Phase 1 geo-environmental desk study has been undertaken in relation to this site. The overall preliminary risk is considered to be Low/Moderate, as potentially active pathways possibly exist on-site. This risk rating is primarily given due to the lack of site-specific ground investigation and chemical data and the possible presence of contamination which could impact upon human health, controlled water and property receptors. It is recommended that future ground investigation should include the need to characterise soils with respect to waste classifications, ground gas risk and aggressive ground conditions (concrete) to confirm the conceptual understanding.

The potential risk for significant remediation to be required is likely to be low given the site history. The following geo-environmental constraints have been identified as possibly present and should be considered during the ground investigation:

- Potential for Made Ground and asbestos in soils to be present due to the demolition of existing buildings.
- Presence of contamination due to historical development and historical presence of a tank and electricity substation.
- Potential for further investigation and consultancy advice if significant source contamination is identified.

The site is likely to be suitable for the Proposed Scheme. However, intrusive ground investigation is needed to inform design and confirm the conceptual understanding.

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<sup>5</sup> EPUK/IAQM (2017) Land-Use Planning & Development Control: Planning for Air Quality  
<https://iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>



Intrusive ground investigations should be undertaken in line with BS5930 Code of Practice for Ground Investigation (using current version) and associated best practice standards<sup>6</sup>. Investigation strategy should also be cognisant of the approaches described in the most recent version of BS10175 Investigation of potentially contaminated sites (Code of practice)<sup>7</sup>.

An Unexploded Ordnance (UXO) Detailed Risk Assessment dated 15<sup>th</sup> September 2021 undertaken by Zetica concluded that there are no significant UXO risks to identified receptors, namely that the risk is negligible.

## **Transport and Access**

During the construction phase, the use of Large Goods Vehicles (LGVs) and Heavy Goods Vehicles (HGVs) is likely to be required to transport materials, plant and equipment to and from the site. The number of which would be determined during the detailed design stage.

Consultation would be undertaken with Mid Suffolk District Council to determine any restrictions with regards to proposed construction access routes and to ensure that the proposals are acceptable. No public footpaths would be affected by the construction of the Proposed Scheme.

If required following consultation with the Highways Officer, a Construction Traffic Management Plan (CTMP) would be secured by a planning condition attached to any planning permission granted. The aim of the CTMP would be to ensure that all the traffic associated with the Proposed Scheme's construction works operate in a safe and compliant manner at all times. The CTMP would set out how any potential impacts from road-based construction traffic would be managed and/or reduced by identifying measures such as clear controls, hours of site operation, appropriate access routes, any prohibited routes, any time restrictions imposed on any routes and the management of deliveries.

A Transport Statement and a Travel Plan have been prepared by Cundall and will be submitted as part of the planning application submission. It is concluded that the Proposed Scheme is expected to have a negligible impact on the operation of the local road network due to the extended time period over which vehicle trips would arrive or depart.

The Travel Plan has identified opportunities for sustainable travel and measures which would help to encourage the use of sustainable modes of travel when accessing the site. Following the development of the Travel Plan, monitoring would be carried out for at least five years after the Proposed Scheme becomes operational.

It is considered that the potential for significant transport-related effects as a result of the Proposed Scheme is low.

Pre-application advice received on 27<sup>th</sup> January 2022 states that there are no highway, parking or access related concerns to raise.

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<sup>6</sup> British Standards Institution (2015) BS 5930:2015+A1:2020 Code of practice for ground investigations London, BSI.

<sup>7</sup> British Standards Institution (BSI), 2011/2017. Investigation of Potentially Contaminated Sites – Code of Practice. BS 10175:2011+A2:2017 edition.

## **Noise**

Construction activities, particularly piling, have the potential to cause high, albeit relatively temporary noise levels. Appropriate construction site management practices would be implemented via a CEMP to minimise potential noise and vibration impacts including consideration of the following:

- Environmental noise barriers;
- Selection of piling rigs and methodology to minimise noise; and
- Timing of works to minimise disturbance during anti-social hours.

Cundall has undertaken an acoustics assessment which sets out the acoustic strategy for the Proposed Scheme, including performance requirements to be achieved. The report concludes that the next steps are as follows:

- Contractor to develop their detailed design proposals to demonstrate their intended method of compliance with the performance standards documented in the acoustic assessment report.
- Contractor to determine the need (or otherwise) for any items of external noise-generating items of plant equipment needed to serve the buildings. If required, a plant noise impact assessment would be conducted to demonstrate compliance with BS 4142 limiting criteria.

The operational/use phase is not anticipated to generate a significant increase in noise and vibration levels due to the nature of the Proposed Scheme.

Taking the above into account, the potential for significant noise and vibration effects is considered to be low.

## **Health**

It is considered that human health (both of existing and new receptors) has been appropriately considered within the relevant topic sections (e.g. ground conditions and contamination, noise and vibration, and air quality). The risks to human health in association with the Proposed Scheme are considered to be negligible and there would be no significant adverse environmental impact during construction or operation.

With regards to the operation/use phase, the Proposed Scheme has been designed to improve the health of its users through the provision of new high-quality sustainable housing.

## **Major Accidents and Disasters**

The Proposed Scheme is not a source of hazard that could result in a major accident, nor would it interact with an external source of hazard (such as being located in proximity to a hazardous site) and potentially increase the risk of that hazard occurring at its external source. Additionally, if an external disaster was to occur (e.g. flood, storm, fire), the presence of the Proposed Scheme is not expected to increase the risk of serious damage to an environmental receptor occurring when compared to the baseline of the same hazard occurring without the Proposed Scheme.

Mitigation measures and safety features would be incorporated into the design of the Proposed Scheme to reduce the risk of major accidents or disasters, particularly in relation to transport accidents. Whilst inevitably there are risks during the construction phase of the Proposed Scheme, it is not considered that these risks would be at an unacceptable level,

given that appropriate health and safety protocols would be adhered to by construction workers. Similarly, the risk of accidents to the general public or the environment during construction and upon operation of the Proposed Scheme is anticipated to be low. It is therefore considered that there would be no significant impacts during construction or operation.

### **Cumulative Effects**

A review of the Mid Suffolk District Council planning portal shows that there are a small number of householder and residential applications within 1km of the flying station site. However, these would not be considered major developments, i.e. they comprise less than 10 dwellinghouses. In combination with the Proposed Scheme, these proposals are unlikely to give rise to significant cumulative effects.

### **Conclusions**

The aim of the Proposed Scheme is to improve the standard of accommodation provision for junior ranks. The scale and form of the proposed SLA remains broadly the same as the existing building. The site of the proposed SLA is within an existing Army site and currently comprises SLA and hardstanding that is being used as a car park.

The project is considered to fall under Schedule 2 of the EIA Regulations. However, consideration of the Proposed Scheme has determined that the potential for significant environmental effects to arise is low. Any potential effects associated with the construction phase are likely to be minor, temporary and localised. Suitable mitigation measures are available to reduce environmental impacts during the construction phase through a CEMP and CTMP. Supporting standalone reports, (e.g. Transport Assessment and Acoustic Design Statement) with any forthcoming planning application would also identify appropriate measures which would be incorporated into the design to ensure there would be no significant effects arising from the Proposed Scheme during operation. Consequently, it is determined that the Proposed Scheme does not constitute EIA development.

In accordance with the EIA Regulations, please could you adopt a Screening Opinion within three weeks of the date of the receipt of this request.

If you require any clarifications, please do not hesitate to contact me.

I look forward to hearing from you.

Yours sincerely,

Andrea Kourra  
Senior Environmental Consultant

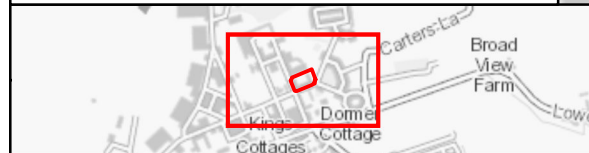
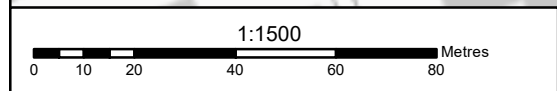
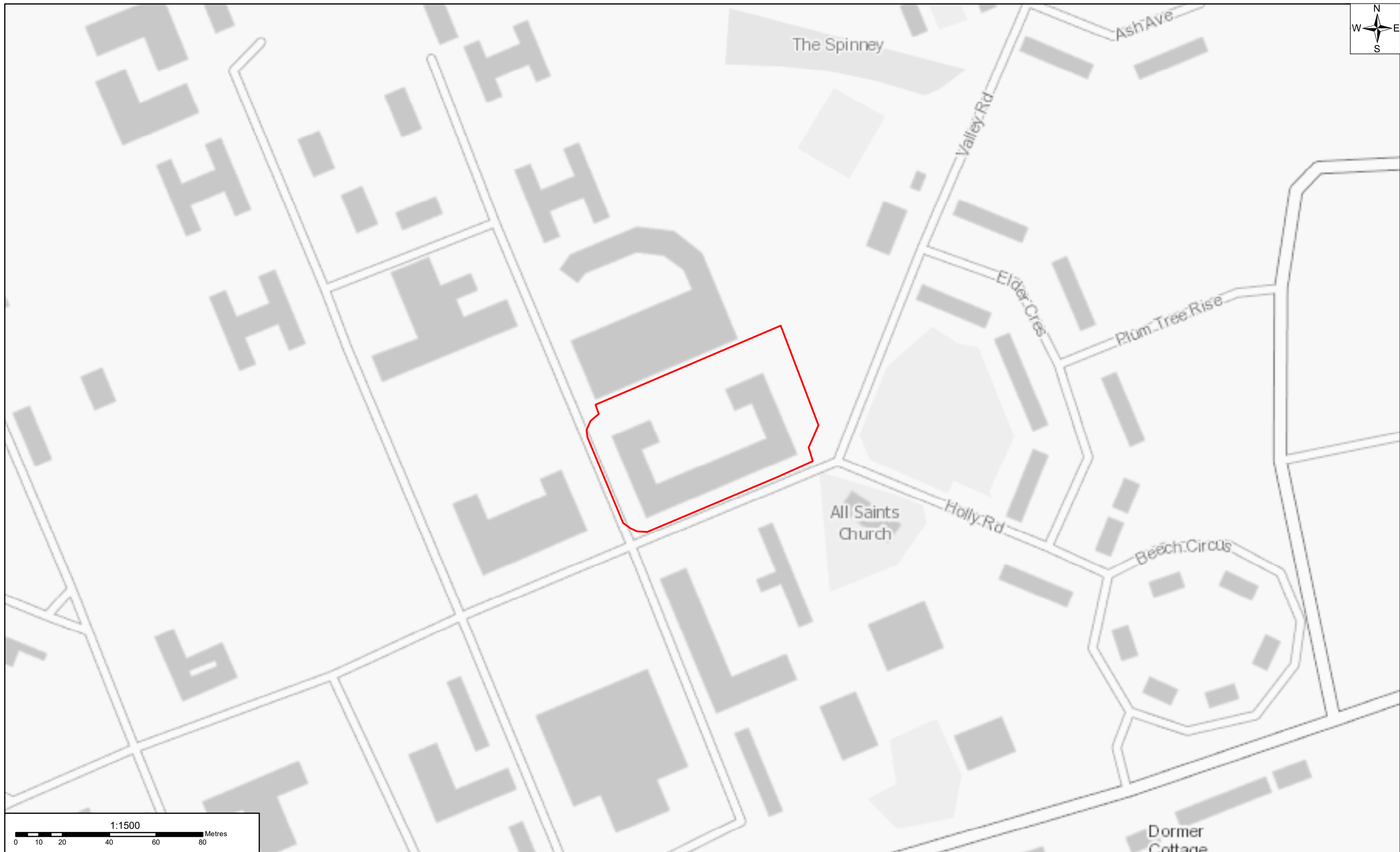
Email: [andrea.kourra@arcadis.com](mailto:andrea.kourra@arcadis.com)

### **Enc.**

Figure 1: Location Plan

Figure 2: Environmental Constraints Plan

**Figure 1: Location Plan**



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REV	Date	Description	Drawn	Check	Approv
01	05/01/22	Initial Issue	MS	AK	MM

**Legend**

Planning Application Boundary

**Client**

**Defence Infrastructure Organisation**

**Client**

DIO Headquarters  
Kingston Road  
Sutton Coldfield  
West Midlands  
B75 7RL  
United Kingdom

<https://www.gov.uk/government/organisations/defence-infrastructure-organisation>

**Site**

Wattisham Airfield,  
United Kingdom

Suitability Description:  
**PRELIMINARY/CONFIDENTIAL**

Designed	C. Wright	Date	05JAN22	Signed	
Drawn	M. Shekaraiah	Date	05JAN22	Signed	
Checked	A. Kourra	Date	05JAN22	Signed	
Approved	M. Mutale	Date	05JAN22	Signed	
Scale:	1:1,500	Datum:	AOD		
Original Size:	A3	Grid:	OS		
Suitability Code:	S2	Project Number:	10050098		

**PROJECT:**

**DIO SLA WAVE 2  
WATTISHAM FLYING  
STATION**

**TITLE:**

**Figure 1:  
Location Plan**

**ARCADIS** Design & Consultancy for natural and built assets

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Drawing Number: **Figure 1** Issue **01**

**Figure 2: Environmental Constraints Plan**



