

Planning and Heritage Statement



**Railway Tavern, School Road
Elmswell, Bury St Edmunds Suffolk,
IP30 9EE**

**Demolition of existing latter additions to the
premises, erection of a large side and rear
extension, all single storey**

Date	December 2023
Site Address	Railway Tavern, School Road Elmswell, Bury St Edmunds Suffolk, IP30 9EE
Development Description	Demolition of existing latter additions to the premises, erection of a large side and rear extension, all single storey
Local Planning Authority	Mid Suffolk District Council
Applicant	Elmswell Community Enterprise

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1. INTRODUCTION

- 1.1 This Statement has been prepared by DKR Rural Planning on behalf of Elmswell Community Enterprise (The Applicant) in support of a full planning application for; *Demolition of existing latter additions to the premises, erection of a large side and rear extension, all single storey*, at the Railway Tavern, School Road Elmswell, Bury St Edmunds Suffolk, IP30 9EE.
- 1.2 The application is accompanied by:
- Forms and Certificates;
 - Topographical Survey – drawing number 34735IPLS-01 (Survey Solutions);
 - External Elevations Survey – drawing number 19674/E/01-01 (EDI Surveys June 2021);
 - Floor Plan Survey – drawing number 19674/F/01-02 (EDI Surveys June 2021);
 - First Floor Plan Survey – drawing number 19674/F/02-02 (EDI Surveys June 2021);
 - Site Plan – drawing number 23-007-SK05 Rev. P2 (Donani Design 16.12.23);
 - Proposed Floor Plans and Elevations – drawing number 23-007-01 Rev. P1 (Donani Design 16.12.23);
 - Proposed Street Scene and Visualisations – drawing number 23-007 Rev. P1 (Donani Design 16.12.23);
 - Preliminary Ecological Appraisal and Ecological Assessment Report (Connected Ecology – November 2023);
 - Preliminary Roost Assessment and Survey Report (Connected Ecology – November 2023); and
 - Groundsure – EnviroInsight Report (18/12/2023).

2. THE SITE

- 2.1 The Application site is a Community Owned Public House ‘Elmswell Tavern’ to the south of School Road and within the village of Elmswell. The site extends to approximately 0.18 hectares. The Site Location is shown at **Figure 1** below.
- 2.2 The site comprises an existing two-storey building, with single-storey additions and a large central chimney stack, finished in cream painted brick, with a clay pantile roof and dark grey windows and doors to the frontage.
- 2.3 The site and existing buildings have a current lawful planning land use as a Public House and is therefore an existing employment site and community service and facility.
- 2.4 The Elmswell Tavern is set back approximately 20 metres from School Road – the western portion of the frontage comprises a parking and manoeuvring area for patrons and the eastern side is a fenced beer garden. There is further outdoor space and

service areas, to the south-east of the main building and considerable amenity land extending to the south of the main public house and immediate surrounds.

- 2.5 The southern portion of the site has previously been granted planning permission for the erection of 8 no. new dwellings, including access.



Figure 1 - Site Location (circled in orange)

- 2.6 The application site is within the Settlement Boundary for Elmswell.
- 2.7 As can be seen from **Figures 2 and 3** below the application site is within Flood Zone 1 (at the least risk of flooding) and (the application site) is not in an area at risk from surface water flooding. There are no ecological designations covering or proximate to the site, the closest is Norton Wood SSSI some 1.7km to the north – west.
- 2.8 There are no Tree Preservation Orders or Conservation Areas covering the application site. As can be see at **Figure 4** below the closet Tree Preservation Order is to the north – west at the entrance to Farm Meadow.
- 2.9 The closest Listed Buildings are 1 to 4 Tudor Cottages approximately 20m to the west of the application site, measured at the closest points, as can be seen at **Figure 4** below.
- 2.10 1 to 4 Tudor Cottages were built as one in around the mid-16th century – the setting of Tudor Cottages is discussed further in the **Heritage Statement** at **Section 6** below.

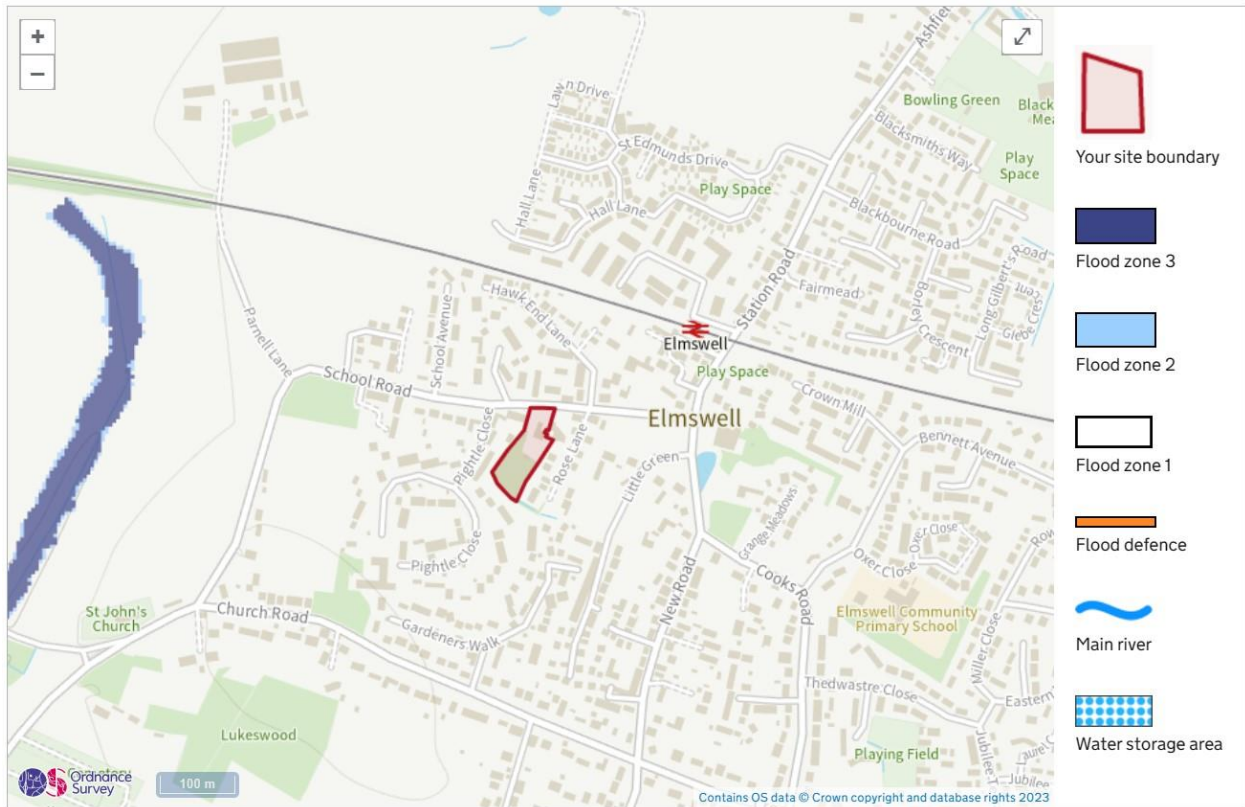


Figure 2 - Flood Zones

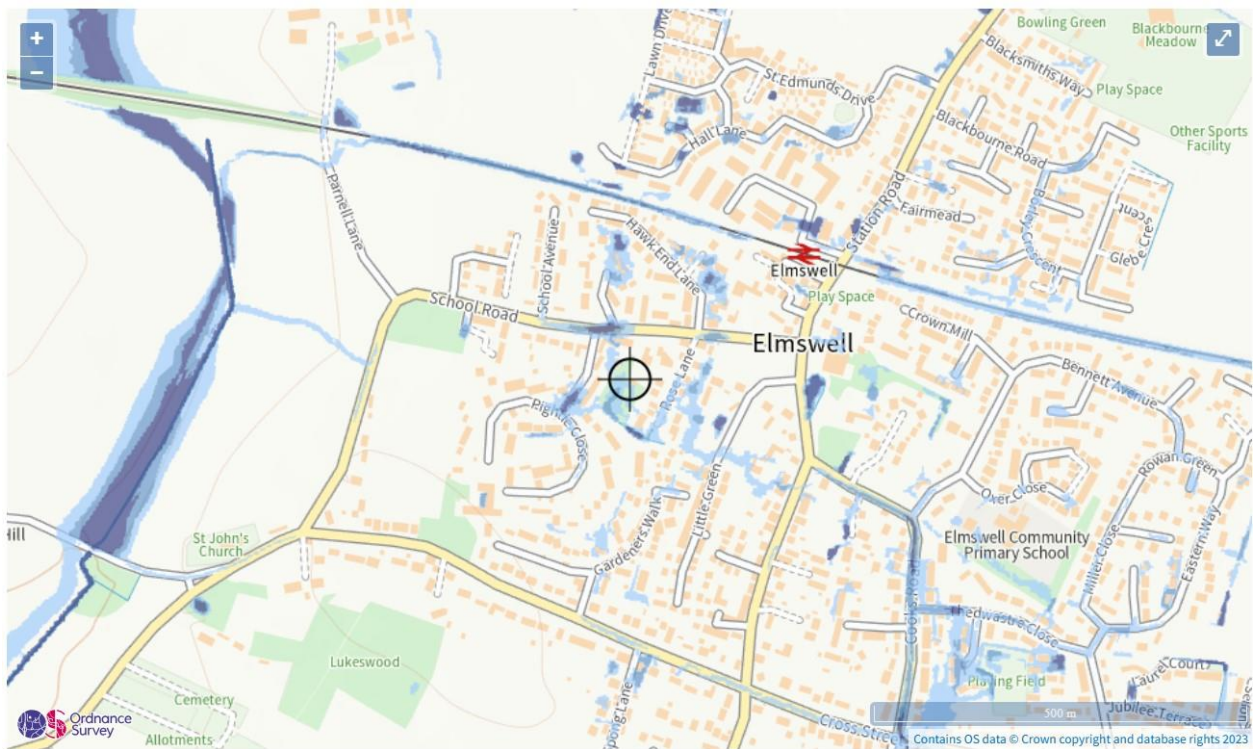


Figure 3 - Surface Water Flooding

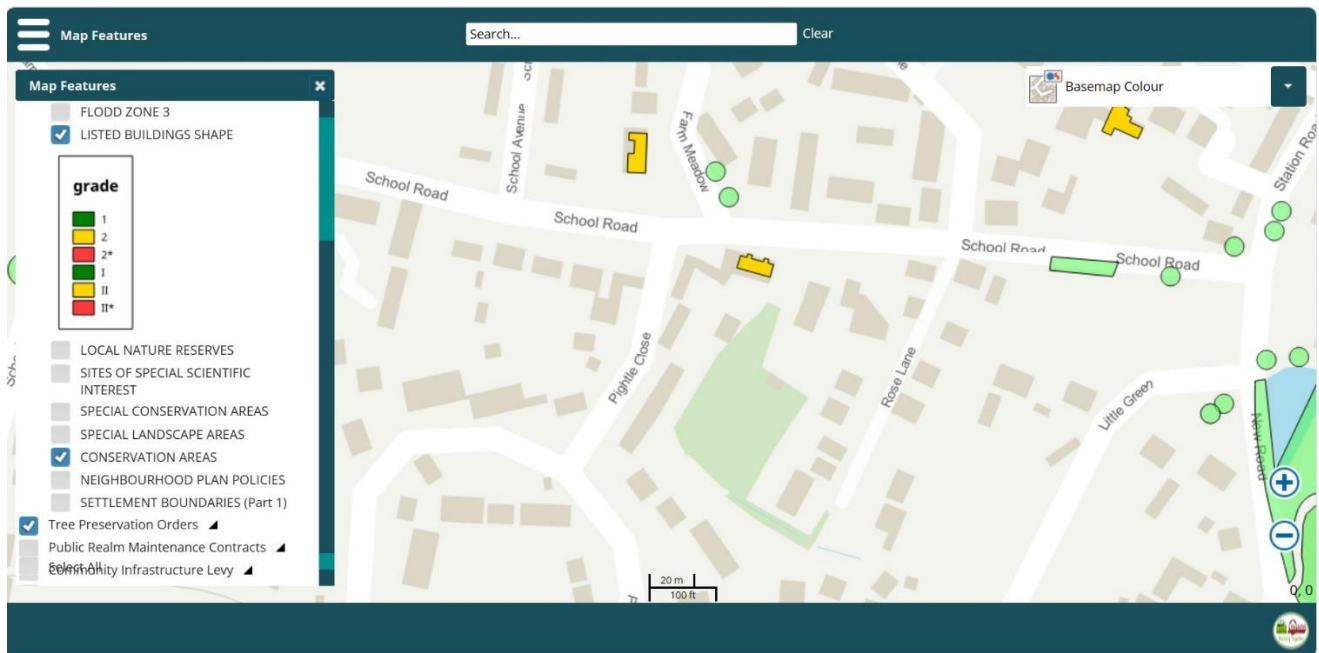


Figure 4 - proximate heritage designations and Tree Preservation Orders

3. PROPOSAL

- 3.1 The proposal is for demolition of the later additions to the premises, and the erection of a replacement side and rear extensions, all at single storey in height.
- 3.2 As can be seen at **Figure 5** below, whilst larger than the existing building footprint, the proposed amends ‘trade off’ a proportion of the piece-meal extensions which have resulted in convoluted, unusable floor space. The proposal provides a more cohesive, serviceable and energy efficient layout to support the re-opening of the Elmswell Tavern.
- 3.3 As can also be seen at **Figure 5** below, the proposal will provide for a purpose entrance lobby and dining area as well as reconfiguration of the kitchen and WC arrangement, separating the ‘traditional pub’ and restaurant offering.
- 3.4 As can be seen at **Figure 6** below, solar shading is incorporated into the south facing elevation via the overhanging roof and supporting timbers, positioned forward of the dining area windows. Brickwork detailing is included to the northern, elevation proximate to the entrance lobby, taking design ques from the adjacent chapel.

4. PLANNING HISTORY

Reference	Planning Application	Decision
DC/18/02259	Full Planning Application- Erection of 8 new dwellings with associated road layout and amenity areas (re -submission of withdrawn application DC/17/03876).	Granted 17/01/2019
DC/17/03876	Planning Application - Erection of 9 No. dwellings, garages and improvement to the existing access including re-configuration of the Public House parking	Withdrawn 30/11/2017
1572/07	Erection of timber framed canopy to form external covered dining area within existing pub garden area.	Granted 19/07/2007
0013/84	Erection of bar and servery extension and minor alterations.	Granted 01/02/1984

5. PRE-APPLICATION ADVICE

5.1 Pre-application Advice (reference DC/23/03205 was received from the LPA on 02nd August 2023. The response is included in full at **Appendix 1** to this statement.

5.2 The key points of the received Planning Advice are summarised below:

- The site and existing building(s) have a current lawful planning land use as a Public House. The site is, therefore, an existing employment site and community service and facility;
- The site directly affects the setting and significance of Tudor Cottages, a Grade II Listed Building located adjacent to the north-west of the site. The site also affects the setting of Elmswell Methodist Church located adjacent to the east of the site, which is considered a non-designated heritage asset.
- On this basis the principle of the proposed development is considered to be in accordance with the provisions of current adopted development plan policies FC1, FC1.1, CS1, CS3, CS4, E4, and E6, and with emerging development plan policies SP03, SP09, SP10, LP09, LP23, LP28, ELM1, and ELM5, and so is supported by Planning Officers.
- Planning Officers have no objection to the proposed demolition of existing later additions and the proposed extensions and alterations to the building, which are considered to enhance the building's function and character within the street scene, in accordance with the provisions of current adopted development plan policies FC1, FC1.1, CS5, GP1, E8, E12, and with emerging development plan policies SP09, SP10, LP15, LP17, LP23, LP24, and ELM2.
- In particular buildings should avoid an overly dominating and oppressive impact on neighbour's outlook, should not result in significant loss of natural sun or daylight, and should avoid windows and raised platforms which overlook private amenity areas of neighbouring properties.

- Having reviewed the proposal it is not considered that the resumed use would result in significant harm to the amenities of nearby residential properties, noting that the existing pub could be re-opened at any time.
- The detailed proposal provided does not raise significant concerns with regards increased loss of outlook, natural light or loss of privacy for neighbouring occupants.
- It is advised that an ecological assessment, carried out by a suitably qualified individual, and proposed mitigation and enhancement measures for biodiversity (particularly Bats) would likely be required in the event of a planning application.
- In the event of a planning application the principle of such a proposal would likely be supported by planning officers.

5.3 Heritage Pre-application Advice was received on 25th August 2023 and is included in full at **Appendix 2** to this statement.

5.4 The key points of the received Heritage Pre Application Advice are summarised below:

- The Railway Tavern, Elmswell is located on School Road, and whilst it is not listed, it does appear on the O.S 1883 map survey, and as such, could be classified as a non-designated heritage asset.
- The first mention of the 'Railway Tavern' in Elmswell is in the White Directory of 1855, just a few years after the railway was completed, in 1848. It is therefore likely that the current building dates from this period, and the architecture of the building attests to this.
- To the West of the Railway Tavern is Tudor Cottages, a Grade II listed building, described on the listing 'as mid-C16 or earlier'. The building was divided into four cottages in the mid-1900s, but its exposed timber-framing is a clear sign of its greater age.
- To the east of the Tavern stands the methodist church, built in 1898 and is classified as a non-designated heritage asset. It is a striking building in red and white brickwork, with Gothic Revival features. Standing forward of the Tavern, it forms a prominent feature in the streetscape.
- Whilst existing and proposed plans have been provided as part of this pre-application enquiry, no heritage statement, or photographs of the interiors of either building have been provided.
- Subject to details on the heritage significance of the outbuildings, I would be unopposed to the demolition of this outbuilding. If appropriate, a recording condition may be recommended if insufficient record is provided in a Heritage Statement when an application is submitted.
- The design approach to the proposed rear and side extensions is basically of a contemporary style, but includes traditional features such as timber weatherboarding on the external elevations. As such the proposed development would harmonise well with the existing elevations. The additional space for

cooking and dining would also sustain the original use of the building as a pub, and its role as a focus of the community.

- Whilst the extension is larger than one might expect for a building of this style, in my view it ties in with the general character of the area. On the east side the proposed extension will appear further forward than the existing, but will not significantly affect public views of the flank of the chapel building. The scheme would introduce a coherence in the ancillary buildings which will improve their appearance. The scheme proposes minimal changes on the west side adjacent to the listed building. For these reasons I do not consider the scheme likely to harm the settings or significance of nearby heritage assets.
- Subject to further details being submitted regarding the age and significance of the outbuildings proposed to be demolished, the proposal is unlikely to cause harm to the significance of the non-designated heritage asset The Railway Tavern. I also consider that the proposed replacement extension would not cause any harm to the settings and therefore significance of the surrounding buildings: Tudor Cottages, and the Methodist Chapel.

6. HERITAGE IMPACT ASSESSMENT

- 6.1 The received Heritage Pre-Application Advice – as summarised at **Section 5** above requested:

A comprehensive Heritage Statement, detailing the significance of the non-designated heritage assets, listed buildings and their settings, and of the various elements within it. The statement should then discuss the impact of the works on that significance. The level of detail should be proportionate to the asset's importance. The Heritage Statement should include numerous interior and exterior photographs to provide detail and context of the site and its surroundings.

- 6.2 In accordance with the received Heritage Pre-Application Advice the following is included:

- Heritage Impact Assessment (HIA) which follows; and
- A section of interior and exterior photographs (**Appendix 3**).

- 6.3 This Heritage Impact Statement has been prepared in support of a full planning application for *Demolition of existing latter additions to the premises, erection of a large side and rear extension, all single storey.*

- 6.4 The Grade II Listed¹ 1 to 4 Tudor Cottages² are to the west, north – west of the Elmswell Tavern.
- 6.5 This HIA assesses the heritage significance³ of relevant heritage assets⁴ within the setting⁵ of the site and any potential effect of the proposed development on this significance.
- 6.6 This statement is in line with guidance set out in the National Planning Policy Framework (September 2023) that “in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary”.
- 6.7 The NPPF states that “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal” (paragraph 195).
- 6.8 Historic England’s Conservation Principles⁶ provide important theoretical underpinning for change in the historic environment: “Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people’s responses to social, economic and technological change. Conservation is the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations (paragraphs 4.1 and 4.2). If conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on that

¹ Grade I buildings are of exceptional interest, only 2.5% of listed buildings are Grade I. Grade II* buildings are particularly important buildings of more than special interest; 5.8% of listed buildings are Grade II*. Grade II buildings are of special interest; 91.7% of all listed buildings are in this class and it is the most likely grade of listing

² [1 TO 4, TUDOR COTTAGES, Elmswell - 1032473 | Historic England](#)

³ Significance (of a place or building) is defined in *Conservation Principles, Policies and Guidance* (Historic England) as “the sum of the cultural and natural heritage values of a place, often set out in a statement of significance”.

⁴ The NPPF defines heritage assets as “buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest”.

⁵ Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

⁶ [Conservation Principles, Policies and Guidance | Historic England](#)

significance (paragraph 5.4). The greater the range and strength of heritage values attached to a place, the less opportunity there may be for change, but few places are so sensitive that they, or their settings, present no opportunities for change" (paragraph 140).

- 6.9 Historic England's Constructive Conservation⁷ requires "a positive and collaborative approach to conservation that focuses on actively managing change with its aim being to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment".

Heritage Assets

- 6.10 A site visit was undertaken in December 2023 to inspect the site and its setting and assess its relationship with designated and non-designated heritage assets within the vicinity of the site. The site was walked over with views into and from the site from all accessible directions.
- 6.11 Both the National Heritage List for England (NHLE)⁸ and the Suffolk Historic Environment Record (SHER)⁹ have been consulted. In addition to the non-designated heritage assets identified by Mid-Suffolk Conservation Officers in their Heritage Pre-Application Advice have been considered. The development has potential to affect the setting of the following heritage assets:
- 1 to 4 Tudor Cottages: Grade II; and
 - Methodist Church (classified as non-designated heritage asset).
- 6.12 Both heritage assets are shown in relation to the application site at **Figure 7** below:

⁷ [Constructive Conservation in Practice | Historic England](#)

⁸ [Search the List - Find listed buildings, monuments, battlefields and more | Historic England](#)

⁹ [The Historic Environment Record - Suffolk County Council](#)



Figure 7 - heritage assets; Listed Building marked blue, non-designated heritage asset marked red and application site outlined in red

Historic Context

- 6.13 Elmswell is a village and parish in the county of Suffolk, situated halfway between Bury St. Edmunds and Stowmarket, just to the north of the A14.
- 6.14 The history of the village can be traced as far back as the Roman times based on a site containing a pottery kiln dated around the third century.
- 6.15 According to the Oxford Dictionary of English Place-Names the origin of Elmswell or in its Old English form Elmswella, as referred to in the Domesday Book of 1086 comes from 'Spring or Stream where elm-trees grow. The place name Elmswella is formed by the conjunction of elm + wella, where wella is Old English for stream.
- 6.16 A huge village green – Bitten Haugh Green – once formed the centre of Elmswell. However, the arrival of the railway in 1846 and the bacon factory in 1911, meant the green was developed.
- 6.17 The 1881 census showed that the number of dwellings in the village was 196 and the population was 761.
- 6.18 The Church of St John the Divine in Church Hill was mentioned in the Domesday Book. Sir Robert Gardiner, former Lord Chief Justice of Ireland, the lord of the manor, who died in 1620, built almshouses next to the church and left them to three women from Elmswell and three from the nearby village of Norton. He is buried in St John the Divine.
- 6.19 The village has had a railway station since 1846, on the line between Bury St Edmunds and Ipswich.
- 6.20 White's Directory of 1855 lists this tavern, the publican being George Randall Baker; he is also listed as a beer seller in the 1844 edition.

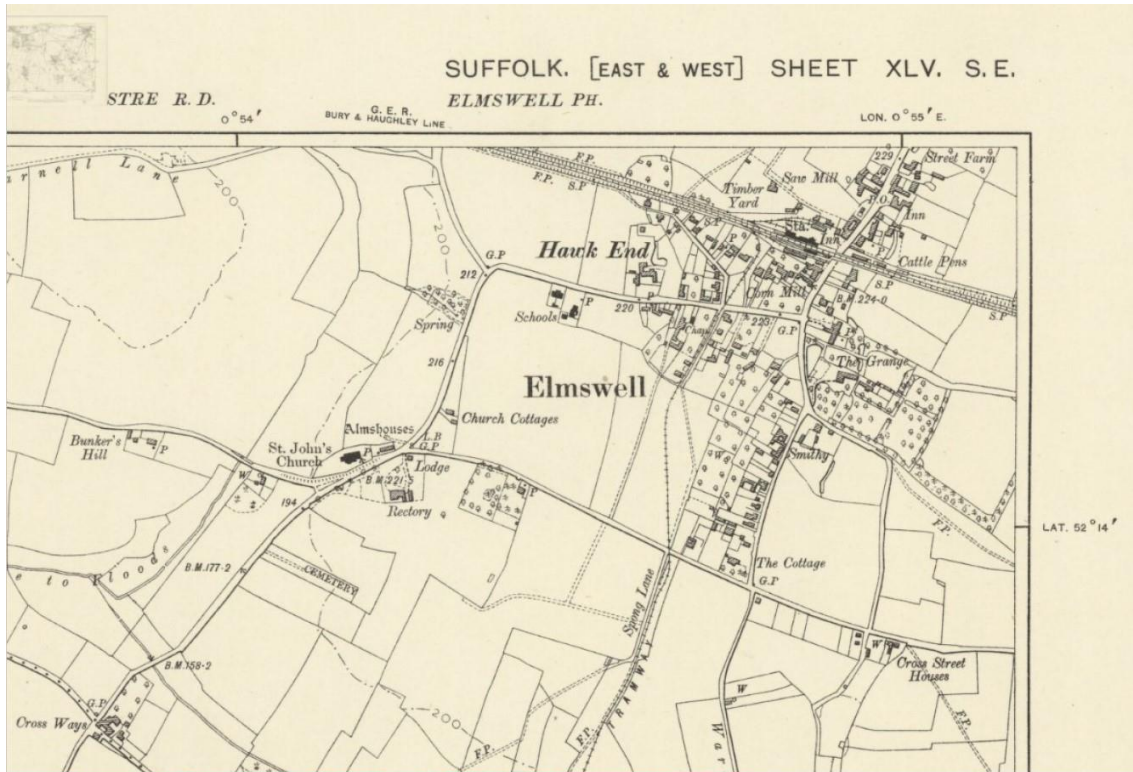


Figure 9 - 1903 OS Map

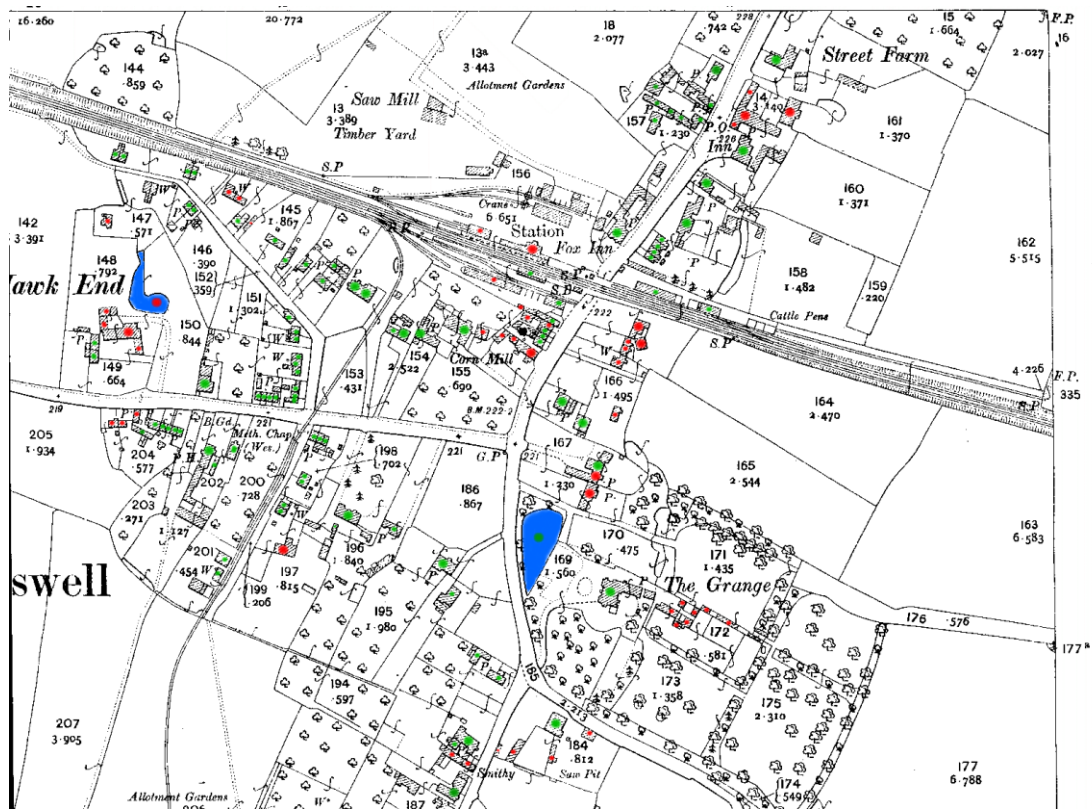


Figure 10 - 1914 OS Map

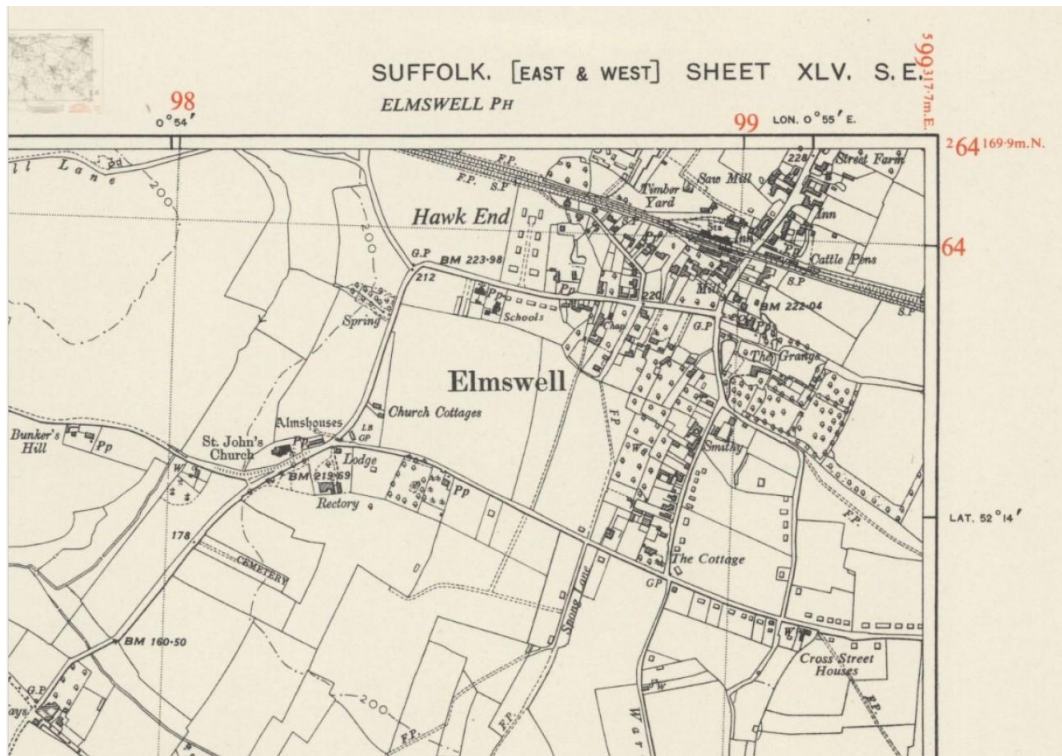


Figure 11 - 1950 OS Map

- 6.22 The Elmswell History Group website proved an indispensable resource also containing historic documents and commentary¹²: “White’s Directory of 1855 lists this tavern, the publican being George Randall Baker; he is also listed as a beer seller in the 1844 edition, but the railway was only just then being built, so we cannot be sure it was the Railway Tavern he then had”.
- 6.23 Whilst it may have existed earlier in the century, the Railway Tavern was in-situ in 1883 and the received heritage pre-application advice reasonably considers the Railway Tavern; “could be classified as a non-designated heritage asset”.
- 6.24 The Elmswell History Group website also holds photographs showing the Railway Tavern (and Tudor Cottages beyond) and School Road in the early 1960’s:

¹² [Railway Tavern | Elmswell History Group \(elmswell-history.org.uk\)](http://www.elmswell-history.org.uk)



Figure 12 - Railway Tavern 1960s (The Elmswell History Group)



1693

Part of Village, Elmswell, Suffolk.

Figure 13 - Tudor Cottages, Railway Tavern and the Methodist Chapel - School Road (The Elmswell History Group)

Significances and Settings

- 1 to 4 Tudor Cottages: Grade II
- 6.25 List description: *Four houses, built as one in mid C16 or earlier. Two storeys. 4 windows. 3-cell plan. Timber-framed: the front wall framing is exposed with plaster infill panels between heavy close-studding. Half-hipped roof, shingled (once thatched). An axial chimney, the shaft rebuilt in mid C20 red brick; gable chimneys of mid C20 red brick to left and right. Mid C20 3-light small-pane casements. Two hipped roofed mid C20 entrance porches with half-timbering and panelled doors. Interior not examined.*
- 6.26 The received heritage pre-application advice states: “The building was divided into four cottages in the mid-1900s, but its exposed timber-framing is a clear sign of its greater age”.
- 6.27 1 to 4 Tudor Cottages as Grade II listed buildings are of special interest., They derive their significance from the historical, aesthetic and evidential values relating to its built fabric and past uses which render the building with high significance. These values are not affected by the proposed development.
- 6.28 When approaching from the West and level with Farm Meadow, 1 to 4 Tudor Cottages are experienced in the street scene, although set back from School Road the timber frames can be appreciated. The setting is contained to the immediate surroundings.
- 6.29 The setting is best appreciated when approaching from the east along School Road, albeit once past the Methodist Chapel and frontage to the Railway Tavern. Viewing from the east the gable chimney and timber and panels can be appreciated over the retaining wall.
- 6.30 Due to the immediately surround buildings (Railway Tavern and Kence) the setting of 1 to 4 Tudor Cottages is curtailed to immediate surrounds. The more modern dwellings, fire station and Huis Building shop fronts, could be considered negative features within the setting; having an overall negative effect on the setting of the asset. This has not reduced its significance which remains high, demonstrating that the asset’s significance is not overly susceptible to some change to the setting due to the significance being inherent in the building itself.
- 6.31 The setting of 1 to 4 Tudor Cottages has changed over time and this change needs to be taken into consideration. The NPPF is clear that the surroundings in which a heritage asset is experienced may change as the asset and its surroundings evolve; in this case, the immediate setting of 1 to 4 Tudor Cottages has now changed to domestic curtilage for 4no. dwellings, abutted by newer property ‘Kence’ to the west and the Railway Tavern car park to the east. With the wider setting comprised of School Road, the fire station and Huis Building shops.

- Methodist Church (classified as non-designated heritage asset).
- 6.32 The received heritage pre-application advice reasonable considers the Methodist church a non-designated heritage asset; “To the east of the Tavern stands the methodist church, built in 1898 and is classified as a non-designated heritage asset. It is a striking building in red and white brickwork, with Gothic Revival features. Standing forward of the Tavern, it forms a prominent feature in the streetscape”.
- 6.33 From the west the Methodist Church is seen in the context of 1 – 4 Tudor Cottages, then the Railway Tavern itself, albeit the Methodist Church is forward of the front elevation of the Railway Tavern. The Setting of the Methodist Church is best appreciated from School Road to the west, roughly parallel with Tudor Cottages, the Railway Tavern beer garden and the immediate frontage. When approaching from the east the setting is curtailed by the existing built form until around Rose Lane when the Methodist Chapel can be seen over the frontage of Grantrose.
- 6.34 As with 1 – 4 Tudor Cottages the significance of the Methodist Church remains in-tact, regardless of proximate development. Application DC/19/00052 granted; *Full Planning Application - Change of use of Wesley Hall from ecclesiastical to community use. Demolition of community hall and erection of single storey community hall*¹³.
- 6.35 The contemporary addition of the community hall confirms the assets’ ability to absorb levels of change with the significance being inherent in the building itself.

Impact Assessment

- 6.36 In summary, this development proposal will result in change within the wider surroundings of the heritage assets; 1 – 4 Tudor Cottages and the Methodist Church. Noting that the development is concentrated away from the Grade II Listed asset on the easter side and rear of the Railway Tavern.
- 6.37 This change will not be uncharacteristic or harmful, indeed it is characteristic of the contemporary addition to the Methodist Church approved under DC/19/00052.
- 6.38 In addition, the proposal is wholly single storey and replaces less cohesive 20th century additions to the Railway Tavern, presenting a more considered addition to the property and street scene.
- 6.39 Any visual change is also mitigated by the fact that Railway Tavern is set back from School Road, with both 1 – 4 Tudor Cottages and the Methodist Church forward of the proposal.
- 6.40 Due to both heritage asset’s significance being mainly derived from inherent factors, the asset’s significance is not overly vulnerable to reasonable and sensitive change within the setting.
- 6.41 It is considered that the setting of the assets is susceptible to a level of change and that the proposal will make a neutral contribution to the asset’s significance. Therefore,

¹³ [DC/19/00052 | Full Planning Application - Change of use of Wesley hall from ecclesiastical to community use. Demolition of community hall and erection of single storey community hall. | Wesley Hall School Road Elmswell Suffolk \(baberghmidsuffolk.gov.uk\)](#)

the proposed change is considered acceptable and will result in no harm to the assets themselves.

- 6.42 The resulting change within the settings of the heritage assets will result in a low level of less than substantial harm.

Explore the way to maximise enhancement and avoid or minimise harm

- The proposal successfully includes enhancement and minimises harm as suggested in the NPPF and outlined in Historic England's guidance on the setting of heritage assets through the removal of piece-meal 20th century additions to the Railway Tavern and provision of contemporary extensions, to bring the community asset back into use.

Conclusion

- 6.43 It is important to bear in mind the above-mentioned Conservation Principles that state that if conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on that significance. The greater the range and strength of heritage values attached to a place, the less opportunity there may be for change, but few places are so sensitive that they, or their settings, present no opportunities for change.
- 6.44 The contribution the wider setting makes to the significance of 1 – 4 Tudor Cottages and the Methodist Church is neutral with the significance of the assets being high. The sympathetic nature of the proposal will reduce any perceived negative and intrusive visual impact of a building in this location (along with the removal of previous additions to the Railway Tavern).
- 6.45 In summary, this development proposal will bring positive change within the wider surroundings of the asset; it will not be uncharacteristic or harmful. Any visual impact is also mitigated by the fact that Railway Tavern is set back from the adjacent heritage assets and the extensions are to the west and rear of the existing building.
- 6.46 As has also been demonstrated, due to the significance being mainly derived from inherent factors; the heritage asset's significance is not overly vulnerable to reasonable and sensitive change within their settings.
- 6.47 The proposal has a neutral effect on the wider setting of the neighbouring heritage assets and no harm has been identified that would require to be outweighed by public benefit. Any perceived harm has been mitigated by positive design. However, should the view be taken that public benefit is required to outweigh perceived harm, public benefits in this case are explicit, the re-opening of the community owned Railway Tavern as a local public house and community asset.
- 6.48 The development complies with the requirements of Section 66 (1) of the Planning (LB and CA) Act, section 16 of the NPPF and other relevant national and local policies, advice and guidance.

7. ASSESSMENTS

Ecology

- 7.1 Connected Ecology have undertaken a Preliminary Ecological Appraisal and Ecological Assessment Report and Preliminary Roost Assessment and Survey Report in respect of bats. The two reports are submitted in full for the attention of the relevant consultees.
- 7.2 A summary of findings is included below:
- 7.3 The proposed Scheme will not affect any statutory designated sites. Furthermore, there will be no loss of habitats that are of Principal Importance under section 41 of the NERC Act 2006. No trees will be affected or lost as a result of the proposed Scheme.
- 7.4 There will be a permanent loss of approximately 450m² of grassland, which has no significant ecological value. There will be additional temporary impacts on approximately 150m² of grassland to enable the demolition and construction works to take place. Other suitable habitats for wildlife including a dense stand of ivy will be lost as part of the demolition works.
- 7.5 The survey results determined that without mitigation, the proposed Scheme could result in disturbance, injury or killing of wildlife. Pre-construction checks and sensitive timing of works are recommended to reduce the risk of harm to any wildlife present. It is recommended that construction materials are stored off the ground on pallets and waste materials in skips.
- 7.6 Amongst other proposed mitigation measures, installation of five bird boxes is recommended to mitigate the impact of the proposed scheme due to the loss of vegetation and reduced suitability of buildings for birds. The installation of three bird boxes should compensate for the temporary loss of suitable nesting habitat. The placement of a further two bird boxes designed for swifts would provide a conservation gain for birds. A bug hotel has also been recommended.
- 7.7 Due to presence of suitable terrestrial habitat for great crested newt and reptiles immediately adjacent to the proposed scheme, and the uncertainty as to whether the great crested newt are present in the pond approximately 85m away, works have to be covered by the Precautionary Working Method Statement (PWMS) as detailed within this report.
- 7.8 On 17 September 2023, a walkover survey was undertaken of the tavern and the wider area to observe, assess, and record any potential roost features and habitats suitable for bats, which could be affected by the proposed Scheme. It was confirmed that overall, the building provided moderate suitability for bats, despite no evidence of bats being recorded during the building inspection.
- 7.9 Two emergence surveys were carried out across September and October 2023, where no evidence of emergences or re-entry of bats was recorded. There were, however, low activity levels of common pipistrelle bat and noctule bat in the vicinity.
- 7.10 There will be a loss of suitable features for roosting bats in the building as a result of the proposed works, which will be compensated through the provision of three bat

boxes. These will be installed prior to any demolition works commencing. The bat boxes will be installed in suitable safe locations to provide safe and sheltered places for bats to roost in the future. It is recommended to install an additional integrated bat box upon completion of the southern extension.

- 7.11 There will be a small loss of suitable foraging resources for bats, with the loss of a dense stand of ivy and grassland habitats. These will be compensated through the provision of selective planting of trees around the boundary of the site. Once established, this will provide increased suitable habitat for foraging and commuting bats on site.
- 7.12 Provided that the recommendations are fulfilled, it is considered there will be no net loss in conservation gain as a result of the proposed Scheme.

8. RELEVANT PLANNING POLICY

8.1 The Development Plan comprises:

- National Planning Policy Framework (NPPF) September 2023;
- Babergh and Mid Suffolk Joint Local Plan – Part 1; and
- Elmswell Neighbourhood Plan 2022-2037 - Submission Plan - January 2023.

8.2 Relevant Planning Policies include:

National Policies and Guidance:

- NPPF - National Planning Policy Framework; and
- NPPG - National Planning Policy Guidance.

Babergh and Mid Suffolk Joint Local Plan – Part 1

- SP03 - The Sustainable Location of New Development;
- SP09 - Enhancement and Management of the Environment;
- SP10 - Climate Change;
- LP09 - Supporting a Prosperous Economy;
- LP15 - Environmental Protection and Conservation;
- LP16 - Biodiversity and Geodiversity;
- LP19 - The Historic Environment;
- LP23 - Sustainable Construction and Design;
- LP24 - Design and Residential Amenity;
- LP27 - Flood Risk and Vulnerability;
- LP28 - Services and Facilities within the Community; and
- LP29 - Safe, Sustainable and Active Transport.

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- ELM1 - Planning Strategy;
- ELM2 - Protection of Important Views; and
- ELM5 - Employment Sites.

9. PLANNING POLICY ANALYSIS

NPPF

- 9.1 The proposal is in accordance with Section 6. of the NPPF and paragraph 81. Which requires; “Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”.
- 9.2 Paragraph 93. of the NPPF states; To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
- “a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; and
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”
- 9.3 The extension of the Community owned Elmswell Tavern directly complies with paragraph 93 and the cultural and community imperative of the NPPF.
- 9.4 At Section 11. of the NPPF, paragraph 120. d) requires planning decisions “promote and support the development of under-utilised land and buildings” the proposed extensions and updates to the Elmswell Tavern will allow for the re-opening of the public house, under community ownership.
- 9.5 The Applicant has instructed Donani Design¹⁴ to ensure a high quality of design. In addition, as summarised above, the proposal has also gone through a pre-application process to ensure a high quality of design in accordance with Section 12, and paragraph 126. of the NPPF which states; “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 9.6 In accordance with Section 15. of the NPPF ecological survey, inclusive of targeted bat surveys, have been undertaken and recommendations made in respect of biodiversity.
- 9.7 Similarly, pre-application advice was sought from the Local Authority Conservation Officers and a full Heritage Impact Assessment is included at **Section 6** above, in accordance with Section 16. Conserving and enhancing the historic environment of the NPPF.

¹⁴ [Donani Design | Architectural Design Services](#)

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- SP03 - The Sustainable Location of New Development
- 9.8 The application site is within the Settlement Boundary for Elmswell and will allow for the re-opening of the Elmswell Tavern in accordance with SP03.
- SP09 - Enhancement and Management of the Environment
- 9.9 Policy SP09 is wide ranging confirming; “...Councils will require development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure, including: landscape, biodiversity, geodiversity and the historic environment and historic landscapes”.
- 9.10 As already established, the pre-application process a Heritage Impact Assessment and ecology surveys undertaken ensure compliance with Policy SP09 in respect of the local environment, biodiversity and historic landscape.
- SP10 - Climate Change
- 9.11 The refurbishment, inclusive of the proposed extensions, of the Elmswell Tavern will improve the energy efficiency and overall performance of the building in accordance with Policy SP10. Solar shading and provision of Electric Vehicle Charging points are also inherent within the proposed plans.
- LP09 - Supporting a Prosperous Economy
- 9.12 Noting the proposal is for the continuation of the existing use, the extensions comply with Policy LP09, as an employment use and through compliance with criteria 1. a. – d. replicated below:
- “a. Be sensitive to the surroundings, including any residential and other amenity, landscape and heritage assets;*
- b. Demonstrate a high standard of design;*
- c. Where necessary, provide contributions to the enhancement of the digital infrastructure network; and*
- d. Demonstrate a safe and suitable access for all users, sufficient on-site parking and that it will not have a severe impact on the road network”.*
- 9.13 With regards the amenity relationship with neighbouring properties, the received pre-application advice confirms; “Having reviewed the proposal it is not considered that the resumed use would result in significant harm to the amenities of nearby residential properties, noting that the existing pub could be re-opened at any time. Also, the

detailed proposal provided does not raise significant concerns with regards increased loss of outlook, natural light or loss of privacy for neighbouring occupants”.

9.14 As already established a high standard of design is inherent through the Applicant appointing a suitably qualified Architectural Designer.

9.15 The proposal utilises the existing vehicular access and parking area, albeit on an improved basis and incorporating electric vehicle charging.

- LP15 - Environmental Protection and Conservation

9.16 In accordance with Policy LP15 the proposal utilises the previously developed land and will revitalise the public house in accordance with the established use of the site.

9.17 A GroundSure EnviroInsight is submitted in support of the proposal for the attention of the relevant consultees which ‘passes’ the site in respect of potential contamination pathways.

- LP16 - Biodiversity and Geodiversity

9.18 Full compliance is afforded against Policy LP16 through the submitted ecology reports summarised at **Section 7** above.

- LP19 - The Historic Environment

9.19 In accordance with Policy LP19 a Heritage Impact Assessment is provided at **Section 6** above.

- LP23 - Sustainable Construction and Design

9.20 Solar shading and provision of Electric Vehicle Charging points are inherent within the proposed plans.

- LP24 - Design and Residential Amenity

9.21 Policy LP24 is not directly relevant to this proposal which amends an existing building as opposed to proposing new development.

9.22 However, the proposal does comply in responding to the existing character of the area and contemporary additions to the neighbouring Methodist Church whilst also taking design cues from the surrounding area, including from the timber frame of 1 – 4 Tudor Cottages.

- LP27 - Flood Risk and Vulnerability

9.23 As established at **Section 2** above, the application is within Flood Zone 1 (at the lowest risk of flooding) and not in an area vulnerable to surface water flooding.

- LP28 - Services and Facilities within the Community

9.24 The proposal directly complies with Policy LP28 in refurbishing and bringing back into use a public house which is now Community Owned.

- LP29 - Safe, Sustainable and Active Transport.

9.25 The proposal includes 8no. Sheffield cycle stands, electric vehicle charging and linked pedestrian access from the adjacent Methodist Church and associated café. Given the central siting, 2 minute walk to the railway station and available bus routes from both School and New Road, Elmswell the proposal is considered to comply with Policy LP29.

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- ELM1 - Planning Strategy

9.26 The proposal complies with Policy ELM1 given the location within the Settlement Boundary.

- ELM2 - Protection of Important Views

9.27 The proposal does not otherwise alter the Important Views shown on the Policy Map. Any views afforded of the extension will be in the context of the existing Elmswell Tavern, boundary treatments and neighbouring Methodist Church.

- ELM5 - Employment Sites

9.28 The proposal complies with Policy ELM5 in extending and allowing for the re-opening of the Community owned Elmswell Tavern.

10. DESIGN AND ACCESS STATEMENT

- 10.1 The role of the Design and Access Statement is to provide an accessible and structured format detailing how the proposed development is a suitable response to the site and its setting and to demonstrate that it can be adequately accessed by prospective users.
- 10.2 This Design and Access Statement has been prepared having regard to the provisions of the national Planning Practice Guidance¹⁵ in addition to guidance contained within 'Design and Access Statements: How to read, write and use them' (CABE, 2007)¹⁶.

Design

- 10.3 Appearance: please see the submitted drawings, the design incorporates brick work, timber framing and glazing to create a contemporary addition to the public house.

Use

- 10.4 The proposed development is as per the existing; public house.

Scale

- 10.5 The scale of the development would be single storey extension to the existing public house, following removal of some historic additions.

Layout

- 10.6 The Proposed Site Plan (drawing number 23-007-SK05 Rev. P2) shows the proposed layout inclusive of parking and turning area and amenity areas.

Landscaping

- 10.7 The existing boundary treatments will be retained and retaining railings added to the north and east boundaries of the proposed car parking area.

Servicing

- 10.8 The application site benefits from all necessary utilities.

Access

- 10.9 The existing is to be maintained, in line with the appropriate standards, ensuring sufficient parking and manoeuvring.

¹⁵ [Making an application - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹⁶ [Design and access statements: how to write, read and use them \(designcouncil.org.uk\)](http://designcouncil.org.uk)

11. CONCLUSION

- 11.1 This statement demonstrates the heritage impact and planning compliance of the full planning application for; *Demolition of existing latter additions to the premises, erection of a large side and rear extension, all single storey*, at the Railway Tavern, School Road Elmswell, Bury St Edmunds Suffolk, IP30 9EE.
- 11.2 The development complies with the requirements of Section 66 (1) of the Planning (LB and CA) Act, section 16 of the NPPF and other relevant national and local policies, advice and guidance.
- 11.3 Given the policy compliance and lack of any planning harm arising from the proposal the application should be approved without delay.