Subject: RE: Planning App. Consultation - DC/15/4788/OUT

Our Ref: E388/009A/ROW664/15

For The Attention of: Phil Perkin

Public Rights of Way Response

Thank you for your consultation concerning the above application.

There are no Public Rights of Way recorded within the red lined site area, therefore we have no objection to the proposed works.

This response does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, we would be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

#### Regards

Jackie Gillis
Rights of Way Support Officer
Countryside Access Development Team
Rights of Way and Access

Resource Management, Suffolk County Council Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

? (01473) 260811 | ? jackie.gillis@suffolk.gov.uk | ? <a href="http://publicrightsofway.onesuffolk.net/">http://publicrightsofway.onesuffolk.net/</a> | Report A Public Right of Way Problem Here For great ideas on visiting Suffolk's countryside visit <a href="http://publicrightsofway.onesuffolk.net/">www.discoversuffolk.org.uk</a>

----Original Message-----

From: d.c.admin@eastsuffolk.gov.uk [mailto:d.c.admin@eastsuffolk.gov.uk]

Sent: 09 December 2015 10:37

To: RM PROW Planning

Subject: Planning App. Consultation - DC/15/4788/OUT

Please see attached document

Any requests made under the Freedom of Information Act or the Environmental Information Regulations should be redirected to <a href="mailto:foi@eastsuffolk.gov.uk">foi@eastsuffolk.gov.uk</a> clearly stating whether the request applies to Suffolk Coastal District Council, Waveney District Council or both authorities.

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## Suffolk Fire and Rescue Service

Suffolk County Council

Suffolk Coastal District Council

Planning Department Melton Hill Woodbridge IP12 1AU



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

Your Ref: Our Ref: Enquiries to: DC/15/4788/OUT FS/F029592 Angela Kempen

Direct Line: E-mail: 01473 260588 Fire.BusinessSupport@suffolk.gov.uk

Web Address:

http://www.suffolk.gov.uk

Date:

14/12/2015

**Dear Sirs** 

# Land and building to East of Bridge Farm, Top Street, Martlesham Planning Application No: DC/15/4788/OUT

I refer to the above application.

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

## Access and Fire Fighting Facilities

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

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

## Water Supplies

Suffolk Fire and Rescue Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued

#### **OFFICIAL**

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

Consultation should be made with the Water Authorities to determine flow rates in all cases.

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

Yours faithfully

Mrs A Kempen Water Officer

Copy; Gladman Developments Limited, Gladman House, Alexandria Way,

Congleton, Cheshire, CW12 1LB

Enc: Sprinkler letter



## Suffolk Fire and Rescue Service

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

Suffolk Coastal District Council Planning Department Melton Hill 21 DEC 2015 Woodbridge Acknowledged Action

Your Ref:

DC/15/4788/OUT

Our Ref: Enquiries to: **ENG/AK** Mrs A Kempen

Direct Line: E-mail:

01473 260486 Angela.Kempen@suffolk.gov.uk

Web Address

www.suffolk.gov.uk

Date:

14/12/2015

Planning Ref: DC/15/4788/OUT

**Dear Sirs** 

**IP12 1AU** 

**RE: PROVISION OF WATER FOR FIRE FIGHTING** 

ADDRESS: Land and building to East of Bridge Farm, Top Street, Martlesham

**DESCRIPTION: 215 Dwellings** 

NO: HYDRANTS POSSIBLY REQUIRED: Required

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

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

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued

## **OFFICIAL**

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

Yours faithfully

Mrs A Kempen Water Officer

----Original Message----

From: RM Floods Planning [mailto:floods.planning@suffolk.gov.uk]

Sent: 14 December 2015 14:49

To: d.c.admin

Subject: JS Reply Planning App. Consultation SCDC - DC/15/4788/OUT, Land And Buildings To East Of Bridge Farm,

Top Street, Martlesham

Suffolk County Council, Flood and Water Management would like to make the following comment:-

The layout of the surface water drainage system is not accept as we believe the attenuation basin is located incorrectly on a slope, on the eastern boundary of the site and consequently would be very deep.

The drainage system does not follow best practise for SUDs or our local SuDs Guidance.

We also feel that the drainage system has not follow best practise for water quality and there is no indication of how the surface water will be treated prior to discharge to the watercourse.

Therefore, we believe the site layout should be revised and resubmitted.

Kind Regards

Jason Skilton Flood & Water Engineer Suffolk County Council

Tel: 01473 260411 Fax: 01473 216864

----Original Message-----

From: d.c.admin@eastsuffolk.gov.uk [mailto:d.c.admin@eastsuffolk.gov.uk]

Sent: 09 December 2015 10:38

To: RM Floods Planning

Subject: Planning App. Consultation - DC/15/4788/OUT

Please see attached document

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## The Archaeological Service

Economy, Skills and Environment 6 The Churchyard, Shire Hall Bury St Edmunds Suffolk IP33 1RX

Barry Reid Head of Development Management Suffolk Coastal District Council Melton Hill Woodbridge Suffolk IP12 1AU

> Enquiries to: Kate Batt Direct Line: 01284 741227

Email: kate.batt@suffolk.gov.uk Web: http://www.suffolk.gov.uk

Our Ref: DC/15/4788/OUT
Date: 22nd December, 2015

For the Attention of Phil Perkin

Dear Barry,

# Re: DC/15/4788/OUT - Land and Buildings To East Of Bridge Farm Top Street Martlesham Suffolk

River valleys have been shown to be focuses of historic activity. The land subject to this application occupies a prominent position overlooking the River Fynn. Indeed, the extensive tidal mudflats to the east suggest that, in antiquity, this point on the river may have been the first significant crossing point inland from the coast. This is further supported by the construction of sea banks (WBG 038) at this point, between the 16<sup>th</sup> and 19<sup>th</sup> centuries. A large curvilinear bank or lynchet bisects the proposed development site. This feature is around 3m high in places, and may be a remnant of a naturally occurring sea/river cliff. Its form, however, is suggestive that this feature has been modified/respected by human action. This is supported by the geophysical survey submitted as part of the application which identified a substantial ditch of similar curvilinear form, running parallel.

There has been little systematic archaeological investigation in the vicinity. However, a number of artefact finds, and the results of small scale archaeological investigations, held on the County Historic Environment Record, suggest Prehistoric (MRM 030, MRM 023, MRM 022, MRM 029), Roman (WBG 015, WBG 007, MRM 022, MRM 029, BEG 007) and Medieval (WBG 007, WBG 031, BEG 007) occupation in the surrounding area.

The geophysical survey report (GSB Survey Report No. G1446, Land off Dukes Park, Woodbridge, Suffolk) submitted in support of the application states that: "The results from the magnetic survey have not detected any anomalies of definite archaeological interest; a few trends of uncertain origin have been recorded. Former field boundaries can be seen which are shown on old mapping." This is in marked contrast to the results of the recent archaeological evaluation of a corridor through the site undertaken in advance of the East-Anglia One cable route. This investigation identified a number of significant features of later prehistoric date, including thick lozenges of buried topsoils that are archaeological in origin, and may represent the remains of barrows. Many of these archaeological features correspond to anomalies interpreted as "geological" in the geophysical survey, and additional features were identified by field evaluation which were not picked up by the geophysical survey.

Further archaeological investigation is required prior determination of the application, in order to have greater confidence that heritage assets will not present a constraint on development as proposed. If the application is approved as it stands, there may be a need for extensive mitigation in the form of excavation to compensate for loss of heritage assets, which will have significant time and cost implications for the development. There may also be heritage assets present which will require preservation in situ under NPPF139 etc.

"139. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."

Suffolk County Council Archaeology Service recommends that, in order to manage this risk, an initial archaeological trial trench evaluation is carried out, at a minimum 3.5% of total area, to 'test' the reliability of the geophysics, and provide evidence on the date and quality of non-designated heritage assets present. The results of this evaluation, in conjunction with the results of the geophysical survey, can then be used to inform the layout of the development, identifying areas where preservation in situ of archaeological remains would be the preferred/required option. Amendments to the masterplan which allowed for preservation *in situ* at this stage would be encouraged. This approach would reduce risk to the developer and help speed up archaeological assessment requirements through the detailed planning application stage.

Suffolk County Council Archaeological Service do not object to the principle of development of the site, but clearer reference to the significance of likely heritage assets (NPPF, 128), and further archaeological investigation, is required to guide the issues which will need to be resolved as part of the planning application process. The earlier that assessment work can be carried out, the less risk that development is delayed by the need for localised redesign to allow for preservation of finds in situ.

Please do not hesitate to contact me should you require additional information or advice.

Kind regards,

Kate Batt BSc (hons)

Senior Archaeological Officer Conservation Team

## **MEMORANDUM**

From Head of Environmental Services and To Head of Planning Services

Port Health – Environmental Protection

Our ref 15/06514/PLNAPP Your ref DC/15/4788/OUT Date 30th December 2015

LAND AND BUILDINGS TO EAST OF BRIDGE FARM, TOP STREET, MARTLESHAM, SUFFOLK

OUTLINE PLANNING APPLICATION FOR UP TO 215 RESIDENTIAL DWELLINGS (INCLUDING UP TO 33% AFFORDABLE HOUSING), A CONVENIENCE STORE (USE CLASS A1, UP TO 400SQ.M GROSS/280SQ.M NET) WITH ASSOCIATED CAR PARKING. DEMOLITION OF EXISTING STRUCTURES, INTRODUCTION OF STRUCTURAL PLANTING AND LANDSCAPING, INFORMAL PUBLIC OPEN SPACE AND CHILDREN'S PLAY AREA, SURFACE WATER FLOOD MITIGATION AND ATTENUATION, VEHICULAR ACCESS FROM IPSWICH ROAD AND TOP STREET AND ASSOCIATED ANCILLARY WORKS. ALL MATTERS TO BE RESERVED WITH THE EXCEPTION OF THE SITE ACCESS.

<u>Head of Environmental Services and Port Health – Environmental Protection</u> Comments

Thank you for your consultation regarding the above.

I have no objection in principal to the development. However, I have some concerns relating to detailed matters, which could give rise to annoyance and possible nuisance:-

- 1. The foul drainage discharge will be a significant increase to the public sewer system network and shall be require approval by Anglian Water prior to the commencement of the development.
- 2. Whilst a Ground Conditions Desk Study Investigation Report submitted by Hydrock Consultants Ltd. Ref. R/14106/001 dated November 2015 has revealed that overall the site appears to be in good condition with no significant sources of potential contamination or ground gas. The site has a long history of farming use and other uses so some contamination may be present and require remediation prior to any residential development.
- 3. The Noise and Vibration Assessment Report submitted by Wardell Armstrong (Job Reference LE12277 Report 001) in respect to the constructional noise and vibration effects of the new development on existing residential properties and the impact of transportation noise and vibration on the new dwellings of this development does not indicate any significant impact. However, a number of mitigation measures are recommended within the report and need to be implemented to ensure both new and existing receptors are adequately protected from adverse noise and vibration impacts.

- 4. The Noise and Vibration Assessment Report submitted by Wardell Armstrong (Job Reference LE12277 Report 001) makes no reference to the proposal for a Convenience Store in the North East corner of the site. Further mitigation measures should be considered to address adverse impact from noise and vibration on both new and existing receptors.
- 5. The Environmental Impact Assessment provides insufficient detail on the timing of the EAOW1 cable routing through the site. If this cable is not already in place prior to this residential development, further mitigation measures should be considered to address any adverse impact from noise and vibration caused by the cable laying process.

I therefore, recommend the following matters be addressed within the full Planning application and appropriate conditions are imposed as follows:-

## **CONSTRUCTIONAL NOISE & VIBRATION**

a) The hours of operation for all constructional activities shall be limited to;
 08:00 to 17:00 hours Monday to Friday
 09:00 to 12:00 hours Saturday and
 None on Sundays.

Prior agreement shall be sought from the Local Planning Authority for all operations, which are to be undertaken outside the above times. These times are indicated within the Environmental Statement.

- b) No piling operations shall be undertaken unless the details and method of piling is previously agreed in writing with the Local Planning Authority.
- c) Deliveries to the construction site shall be undertaken between 09:00 and 16:30 hours. (Except for the delivery of abnormal loads to the site which may cause congestion on the local road network.)

Prior agreement shall be sought from the Local Planning Authority for all deliveries, which are to be undertaken outside the above times.

- d) Contractors shall be required to demonstrate that suitable mitigation measures are taken to reduce the impact of noise and vibration to nearby residential properties, using;-
  - Good practice procedures as set out in BS5228:2014,
  - Best Practicable Means (BPM) as defined in Section 72, of the Control of Pollution Act 1974 (COPA),
  - Careful location of plant to ensure any potentially noisy plant is kept away from the site boundary as far as possible,
  - Careful selection of construction plant, ensuring equipment with the minimum power rating possible is used, and that all engine driven equipment is fitted with a suitable silencer,
  - Regular maintenance of plant and equipment to ensure optimal efficiency and quietness.
  - Training of construction staff where appropriate to ensure that plant and equipment is used effectively for minimum periods,

- If identified as necessary, the use of localised hoarding or enclosures around specific items of plant or machinery to limit noise breakout especially when working close to the boundary.
- e) All residents who are likely to be affected by piling or constructional noise that exceeds 64dB(A) expressed as a 1 hour L(A)eq value shall be notified at least 24 Hours in advance of the works and given an estimate of how long the elevated noise levels will continue.
- f) Prior to the construction of any new residential dwellings, a glazing and acoustic ventilation scheme shall be calculated for each plot as recommended by The Noise and Vibration Assessment Report submitted by Wardell Armstrong (Job Reference LE12277 Report 001). This glazing and acoustic ventilation scheme shall incorporate upgraded glazing specifications for all properties identified as requiring noise attenuation measures and shall be agreed in writing with the Local Planning Authority.
- g) Prior to the construction of any new residential dwellings, a detailed design layout of the site boundary noise mitigation measures in the form of barriers or bunds shall be agreed in writing with the Local Planning Authority.

# MITIGATION OF NOISE FROM THE CONSTRUCTION OF THE EAOW1 CABLE PROJECT

h) In the event that this residential development is occupied prior to the construction of the EAOW1 cable project, a scheme shall be submitted for approval with the Local Planning Authority aimed at mitigating any adverse impact from noise and vibration caused by the cable laying process through this site.

## **GROUND CONTAMINANTS**

- i) Following site clearance and prior to the construction of the new dwellings, a Phase II intrusive ground investigation survey and a Type 3 asbestos survey shall be undertaken to identify any potential contaminants. In the event that any such sources of contamination are revealed a remediation plan shall be submitted to the Local Planning Authority for approval. This remediation plan should contain the following information:-
  - The results of any test samples carried out at this site, indicating the presence of any contaminants;
  - A risk assessment relating to groundwater and surface waters associated on and off the site, that may be affected; and
  - A Method Statement detailing what remediation measures will be taken to:
  - Minimise the impact on ground and surface waters,
  - Safely remove any contaminated land and replace it with inert fill or alternatively submit a plan of how contaminated land is to be safely encapsulated.
- j) Once the Local Planning Authority has assessed the remediation plan and approved its content, approved works and remediation measures shall be implemented in accordance with the method statement.

- k) Any above ground or below ground tanks together with associated pipework and any contaminated soil affected by oil spillage shall be safely removed from site.
- In the event that any contamination is found at any time when carrying out the development that was not previously identified, it must be reported to the Local Planning Authority. An investigation and risk assessment shall be undertaken in accordance with the requirement of Condition i) and where remediation is necessary, a further remediation plan shall be prepared and agreed in writing with the Local Planning Authority.
- m) The Local Planning Authority shall be notified in writing at least seven days prior to any removal or encapsulation of any contaminants.
- n) Detailed information in respect to;-
  - The storage of waste materials (both liquid and solid) produced during the construction phase of the development shall be agreed with the Local Planning Authority prior to the commencement of the development.
- o) The Local Planning Authority shall require written validation that
  - All contaminated material removed from the site is removed by an appropriate licensed contractor to a facility approved by the Environment Agency.
  - All imported material is suitable for its intended use and certified to CLEA standard as specified in the European Community Directive 80/778) and (BRE) 465 Cover Systems for Land Regeneration and Contaminated Land. Details of certified materials should be retained for this purpose.
  - Remediation measures have been undertaken to render the site suitable for the residential use specified.

## **SITE LIGHTING**

p) Details of the location, height, design, any activity sensors and illuminance of all floodlighting used during construction works shall be agreed with the Local Planning Authority prior to the commencement of the development. Measures to limit obtrusive glare to nearby residential property and to minimise sky glow shall be incorporated in the design of all floodlighting.

## SITE ACCESS AND PUBLIC SAFETY

q) Site access for members of the public shall be restricted during the constructional works of the development, to ensure public safety. A method statement detailing the safety measures to be imposed on site shall be agreed with the Local Planning Authority prior to the commencement of the development.

## Please Note;

Air Quality and Dust Mitigation is covered separately via the Air Quality Officers response.

Clive Pink Environmental Health Officer

## **MEMORANDUM**

From Head of Environmental Services and To Head of Planning Services

Port Health – Environmental Protection

 Our ref
 15/06514/PLNAPP

 Your ref
 DC/15/4788/OUT

 Date
 13th January 2016

LAND BETWEEN DUKES PARK AND TOP STREET, IPSWICH ROAD, MARTLESHAM, SUFFOLK OUTLINE PLANNING APPLICATION FOR UP TO 215 RESIDENTIAL DWELLINGS (INCLUDING UP TO 33% AFFORDABLE HOUSING), A CONVENIENCE STORE (USE CLASS A1, UP TO 400SQ.M GROSS/280SQ.M NET) WITH ASSOCIATED CAR PARKING. DEMOLITION OF EXISTING STRUCTURES, INTRODUCTION OF STRUCTURAL PLANTING AND LANDSCAPING, INFORMAL PUBLIC OPEN SPACE AND CHILDREN'S PLAY AREA, SURFACE WATER FLOOD MITIGATION AND ATTENUATION, VEHICULAR ACCESS FROM IPSWICH ROAD AND TOP STREET AND ASSOCIATED ANCILLARY WORKS. ALL MATTERS TO BE RESERVED WITH THE EXCEPTION OF THE SITE ACCESS.

<u>Head of Environmental Services and Port Health – Environmental Protection Comments</u>

Thank you for your consultation regarding the above.

I wish to comment on **air quality** matters regarding this application as follows:

Chapter 11 of the Environmental Statement, November 2015, titled 'Air Quality and Odour', provides an air quality assessment of the Construction and Operational Phases of the development.

With regard to the **Operational Phase** of the development, the impacts are predicted to be negligible, including within the Air Quality Management Area (AQMA) declared in Woodbridge. I am happy to accept these results, providing the predicted traffic flows used are not altered in the future. If the predicted traffic flows require alteration I will require the Air Quality Assessment to be updated, resubmitted and then reassessed by this department.

The Environmental Statement advises that it may be possible to further reduce the impact of the development with the implementation of the following:

- A green travel plan
- Low NOx boilers to be installed at the proposed dwellings.

In order to offset the increased emissions associated with this development I would recommend that both mitigation options are placed as a Condition on the site.

With regard to the **Construction Phase** impacts of the development, Chapter 11 of the Environmental Statement November 2015 advises that:

The Construction Phase assessment has been undertaken to determine the risk and significance of dust effects from earthworks, construction activities and trackout from the Project. The assessment has been undertaken in accordance with the guidance on assessing the impacts of construction phase dust published by the Institute of Air Quality Management (IAQM). It states that a best practice dust mitigation plan will be written and implemented for the Project. This will set out the practical measures that could be incorporated as part of a best working practice scheme. This will take into account the recommendations included within the IAQM guidance. The document then lists a number of options for inclusion in the dust mitigation plan. The report concludes that with site specific mitigation measures in place, such as those detailed, the significance of dust effects from earthworks, construction and trackout are considered to be not significant.

I therefore have no objections to make regarding the Construction Phase of the development provided that the following Condition is placed on the site:

A Dust Mitigation Plan must be written and implemented for the site using guidance provided by the Institute of Air Quality Management. This should include the measures suggested in Chapter 11 of the Environmental Statement for Land Off Duke's Park Woodbridge, November 2015. This should be agreed with Suffolk Coastal District Council before any work commences on the site. The recommendations of which must be implemented during the construction phase of the development.

Your Ref: DC/15/4788/OUT Our Ref: 570\CON\3909\15 Date: 14 January 2016

Highways Enquiries to: luke.barber@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.

Email:

The Planning Officer
Suffolk Coastal District Council
Council Offices
Melton Hill
Woodbridge
Suffolk
IP12 1AU

For the Attention of: Philip Perkin

Dear Philip,

## TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN DC/15/4788/OUT

PROPOSAL: Outline planning application for up to 215 residential dwellings (including up

to 33% affordable housing), a Convenience Store (Use Class A1, up to 400sq.m gross/280sq.m net) with associated car parking. Demolition of existing structures, introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, vehicular access from Ipswich Road and Top Street and associated ancillary works. All matters to be reserved with the

exception of the site access.

LOCATION: Land at, Top Street, Martlesham, Woodbridge, Suffolk

ROAD CLASS: B1438

Suffolk County Council, in its capacity of Highway Authority for this location, does not have an in principal objection to a development of this scale at this location. The site has potential for sustainable transport choices as the bus services in the area are reasonably frequent and serve several key employment and education centres. The existing bus stops on Top Street have been recently upgraded and new stops are proposed on Ipswich Road. With some site specific mitigation measures there are deliverable options for providing improved pedestrian and cycle links to the employment, retail and education facilities in Woodbridge. An uncontrolled crossing with a pedestrian refuge is proposed to enable pedestrians from the potential site to access the footway link towards Woodbridge.

However we do have significant concerns regarding the layout of the proposed development, the accesses proposed onto Ipswich Road and Top Street and the interaction between the two accesses. Therefore on the basis of the information provided at this stage we would recommend that the Local Planning Authority refuses the current application, pending a revised layout being submitted.

#### **Access and Layout**

Our preference would be for a single access for this development to be taken direct from the B1438 junction with Top Street roundabout; this will provide the easiest access to the B1438 and the A12 and will reduce the impact of the development on unsuitable minor roads in the vicinity of the site. The site extents appear to share a boundary with the highway boundary so this option should be deliverable. We have previously indicated that this would be our preference.

If the roundabout access is not deliverable for other reasons we have concerns about the layout and access arrangements as shown on the application details. It has been proposed that the Top Street access will only serve a small proportion of the site, with the majority and the proposed retail unit being served from the alternative access onto Ipswich Road (B1438). It has also been indicated to us that there will be vehicular access between the two sites and therefore both access will be fully connected. It is our view that in peak conditions a higher than anticipated proportion of the site traffic will exit via the Top Street access, rather than onto the B1438. As this traffic would have to turn right to access the Top Street / B1438 roundabout, and onto further afield destinations via the A12, we feel it is likely that a higher proportion will turn left out of the site to use minor roads such as Main Road, Bealings Road and Felixstowe Road to access local employment destinations such Martlesham (BT and Tesco) and Ipswich. Therefore should the development proceed on the basis of the two accesses proposed there should be no general vehicular access between the two areas of the development. The link over the green margin shown on the plan ('Informal Green Space') should be available to pedestrians, cyclists and emergency vehicle access only.

The Transport Assessment makes the case that the retail unit proposed will generate very few trips as the use could be considered to be internal to the development or 'pass by'. However given the location very close to the A12 and on the main link from the A12 to Woodbridge we have concerns that this will be a popular trip generator and we feel that this aspect needs further analysis to determine the specific transport impact and the cumulative affect with the residential use.

However, if the site layout is amended and the transport issues highlighted above can be addressed by a revised Transport Assessment we would be happy to re-assess our current position. Should the development proceed in a revised form we would require that a Section 106 agreement is in place to deliver site specific mitigation measures. We would also require a set of standard highway conditions to ensure that the junction and internal details are correctly detailed. For clarity the details are listed below.

#### **Travel Plan**

The Suffolk County Council Travel plan Co-ordinator has reviewed the Residential Travel Plan (dated November 2015) that was submitted to support this application.

The travel plan identifies a target of reducing single-occupancy vehicle travel by 10% from the initial baseline survey however some more site specific measures need to be identified in the document to achieve this target.

The travel plan does identify some measures, however on their own they are unlikely to encourage residents to choose alternatives to single-occupancy vehicle travel during the peak travel periods. This will need to involve some further work with the interim baseline data to identify where residents that live in the area surrounding the proposed development travel to work. This data can be acquired from either the http://commute.datashine.org.uk/ website or from the Nomis website by running an "Origin-Destination" search for the Suffolk Coastal 010 middle layer. This should help identify where residents are likely to travel to and help tailor the travel plan measures and objectives accordingly.

The welcome pack that is going to be provided to each dwelling will require some further improvement, as there will need to be a public transport voucher included that will encourage the residents to use the existing buses that serve the site, as well as the local cycle infrastructure. A minimum of two annual bus season tickets should be provided for each dwelling. This should help encourage the residents use the bus services towards Ipswich and Woodbridge and establish a habit. If the resident does not feel that they would benefit from a bus season ticket; a cycle voucher of equivalent value should be offered to them instead. These incentives should also be backed up with offering some personalised travel planning for each dwelling. These personalised travel plans must ideally be provided face-to-face with the resident, with the methodology of how the personalised travel plans will be undertaken identified in the travel

plan. Further measures of how the travel plan will be marketed to the residents must also be included. The marketing should include the provision of a website, social media and providing residents frequent newsletters to continuously promote the travel plan after the residents have received their welcome packs.

Some further background information should be included, such as providing a list of where the local amenities and catchment schools are located for residents, as these locations are likely to generate trips. Additional measures may need to be included in the travel plan to reduce the need to travel to these amenities by single-occupancy vehicle. It will also be useful to include when the convenience store will be constructed and the estimated build out time of the development to establish how long the travel plan will need to be implemented for.

Further amendments will need to be made with the monitoring and management of the travel plan. The baseline monitoring should be undertaken on occupation of the 100th dwelling to ensure there is a representative sample of residents. The travel plan must then be fully implemented and monitored annually until five years have passed after the final (215th) dwelling has been occupied. Also if the 10% modal shift target has not been achieved, some remedial travel plan measures must be identified. Remedial measures could involve re-issuing some measures to the residents, or providing travel plan measures off-site, such as a Smarter Choices scheme to further mitigate the effects the development will have on the local highway infrastructure.

I would require the applicant to submit a revised travel plan that takes into account the comments above prior to the determination of the application.

These revisions need to comply with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, 36 and 37.

In addition, a decent quality travel plan will also support Strategic Objective SP1 and Development Management Policy DM20 of the 2013 Suffolk Coastal District Local Plan - Core Strategy & Development Management Policies.

To secure the travel plan I would require the following Section 106 contributions:

- Travel Plan Travel Plan Evaluation and Support Contribution £1,000 per annum until five years
  have passed after occupation of the final (215th) dwelling. This is to cover Suffolk County Council
  officer time working with the Travel Plan Coordinator and agreeing new targets and objectives
  throughout the full duration of the travel plan
- Travel Plan Implementation Bond £401,486 (based on SCC calculations on the cost of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves

I would also require the following Section 106 obligations:

- Implementation of the Travel Plan
- Provision of an approved welcome pack to each dwelling after first occupation
- Securing remedial travel plan measures if the 10% target in reducing single-occupancy vehicles is not achieved

Further detailed comments in regards to the content of the travel plan can be provided on request, if required.

In addition we would also require a S106 obligation to deliver an enhanced shared footway / cycleway link from the proposed development to the junction with Old Barrack Road.

This facility is necessary to provide a suitable link for cyclists and pedestrians from the development to roads with reduced traffic flows which provide access to Kyson School and the Market Place area of Woodbridge. The measure is deliverable as there is sufficient highway verge to allow for widening to 2 – 2.5m wide over this length which is sufficient for a shared use facility. The measure is proportionate to the scale of the development and would enable short and medium length local trips to be made by sustainable means of travel.

Full wording for the proposed obligations and how they meet the three tests can be provided at a later date.

## **Public Rights of Way Response**

As a result of the anticipated use of public rights of way network, the SCC Rights of Way team would be looking for funding to improve and enhance the following routes:

- The internal layout should provide a new pedestrian link from Ipswich Road onto Top Street. The
  Parish Council are keen on a safe link as the derestricted part of Top Street has no footway and is
  considered to be dangerous for pedestrians
- Improve the footpath link (FP11 & FP50) through Sluice Wood to Church Lane
- Improve footpath link (FP8) alongside the tributary to the River Fynn. This will require surface and bridge improvement works
- Improve footpath link (FP9A) from Top Street at the nursery, along Brock Lane and then under the A12. This will require surface improvement works
- Creation of a new path on the Highway verge at the base of the bank on the north side of the A12 making the connection to Seckford Hall path and connecting two sections of FP10, previously severed.
- With the proposed pedestrian access onto Sandy Lane, then there will need to be safety
  improvements along Sandy Lane by the railway bridge for Non-Motorised Users to access the river
  via the footpath down by the Sewage works or by bike along Sandy Lane.

It is estimated that the total cost of this work would be £80,000.

If the Local Planning Authority was minded to grant Planning Permission to an application covering this site in the future, we would suggest that the following conditions are included:

#### 1 AL 3

Condition: The new vehicular access shall be laid out and completed in all respects in accordance with Drawing No. C14106/002; and with a road width of 6m at the junction with the ipswich Road and 4.8m at the junction with Top Street and made available for use prior to comencement of the development. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

### 2 P 2

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

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

#### 3 V 2

Condition: Before the access is first used visibility splays shall be provided in accordance with details previously approved in writing by the Local Planning Authority and thereafter shall be retained in the approved form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General

Permitted Development) Order 1995 no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays. The current access drawing (C14106) shows 90m visibility splays on both roads. While this is appropriate for Top Street, the B1438 has significantly higher traffic speeds, and may require a longer splay in both directions. To accept a visibility splay of 90m on an access in this location on the B1438 we would require a speed survey to verify the actual speeds on site, and depending on the results found we may require a longer splay more appropriate to a 40 mph speed limit, 120m for example.

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

#### 4 ER 1

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

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

#### 5 ER 2

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

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

#### 6 ER 3

Condition: The new estate road junction(s) with inclusive of cleared land within the sight splays to this junction must be formed prior to any other works commencing or delivery of any other materials. Reason: To ensure a safe access to the site is provided before other works and to facilitate off street parking for site workers in the interests of highway safety.

#### 7 NOTE 03

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense.

The County Council's East Area Manager must be contacted on Telephone: 01728 652400. Further information can be found at: www.suffolk.gov.uk/environment-and-transport/highways/dropped-kerbs-vehicular-accesses/

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

#### 8 NOTE 07

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

#### 9 NOTE 12

Note: The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer.

#### 10 NOTE 15

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

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements,

indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

To confirm our position on the highways aspects of this proposal, we currently feel that the site layout does not adequately deal with our concerns about the likely distribution of trips for the proposed residential and commercial areas, and feel there is a high likelihood of significant increases in traffic on inappropriate minor roads in the general area. However subject to a revised layout which addresses the access concerns we would be prepared to re-consider our view in the future. Therefore we have included information on likely obligations and conditions that could be applicable to a revised application, to give the applicants time to consider these areas before considering how best to address our highway concerns with the layout as shown.

Yours sincerely,

Mr Luke Barber Senior Development Management Engineer Strategic Development – Resource Management

CD4.9

## <u>Martlesham Parish Council's objection to planning</u> <u>application DC/15/4788/OUT – Land and Buildings to east</u> of Bridge Farm, Top Street, Martlesham

Outline planning application for up to 215 residential dwellings (including up to 33% affordable housing), a Convenience Store (Use Class A1, up to 400sq.m gross/280sq.m net) with associated car parking. Demolition of existing structures, introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, vehicular access from Ipswich Road and Top Street and associated ancillary works. All matters to be reserved with the exception of the site access.

#### **Executive summary**

Martlesham Parish Council strongly objects to Planning Application DC/15/4788/OUT on the grounds that it is contrary to or does not meet the requirements of the National Planning Policy Framework (NPPF), the Suffolk Coastal Local Plan & saved policies, the emerging Neighbourhood Plan and the ongoing Site Allocations & Area Specific policies consultation.

Our specific objections are listed below.

Note: there is no order of importance in the item numbering

No	Relevant Policies	Reason for Objection
1	NPPF Paragraphs 11, 55 & 118 Sustainable Development	"The presumption in favour of sustainable development": it needs to be shown that this planning application meets economic, social & environmental requirements. The Parish Council argues that it fails to do so.  a) Economic: the development should contribute to "building a strong, responsive and competitive economy including the provision of infrastructure". The provision of a convenience store cannot be viewed as contributing to economic growth. This development may well have a negative impact on the local tourist economy by reducing the attractiveness of the area which is within the Fynn Valley and on the approach to Woodbridge. It would also add to existing infrastructure problems regarding traffic & transport links.  b) Social: There is no evidence to show that this development reflects the community's needs and would "support its health, social & cultural well-being". The application would remove the open space between the communities of Martlesham & Woodbridge, the enjoyment of which is a vital part of community well-being. The Martlesham community has made it clear through a Neighbourhood Plan survey in 2014 that maintaining the open space between

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		Martlesham and Woodbridge is very important to over 80% of respondents.
		c) Environment: this includes protecting & enhancing the natural environment. The proposed development fails particularly in this respect because it abuts an Area of Outstanding Natural Beauty (AONB), a Special Landscape Area (SLA), and is sufficiently close to the Deben Estuary SSSI and RAMSAR sites to have a negative impact on areas protected for their landscape & beauty. Suffolk Coastal Local Plan policies recognise the environmental role of this site & seek to protect it.
2	Local Plan SP1 Sustainable development	The Local Plan echoes the requirements of the NPPF above & therefore this application is also contrary to policy SP1.
3	SP2 Housing Numbers & Distribution and SP19 Settlement Hierarchy	The allocation for the Eastern Ipswich Plan Area (EIPA) is 29% of 7,900 new homes up to 2027. However 2,320 new homes have already been allocated. The addition of 215 new homes would increase that to 2,535 which is over 32% for the whole of the EIPA. Together with existing proposals for the Woodbridge Town Football Club site this increases to 34% and clearly becomes overdevelopment for the local area. The local infrastructure is not in place to support it.  Settlement Hierarchy is a key tool with which the planning authority will achieve its Vision for the district in 2027. The site proposed is designated Countryside and therefore the application needs to meet the conditions of policy SP29, see below.
4	SP8 Tourism	This policy refers to area (c) Aldeburgh and Woodbridge. "Two small towns in sensitive locations within and adjacent to the AONB respectively. The protection of their settings will be of prime importance."  As already stated, the area proposed is an extension of the Fynn Valley, links with the Deben Estuary protected area and forms a natural open space between Woodbridge and Martlesham. If coalescence between Woodbridge & Martlesham were to take place it would detract from the setting of Woodbridge as a market town. The gap between the settlements was key for the siting of the railway and more recently the chosen route of the East Anglia ONE onshore cable line.
5	SP11 Accessibility	The site is not well connected to shops, schools, surgeries & businesses without the use of a car. It is therefore not sustainable. Traffic problems would be exacerbated. There is the likelihood that traffic will make journeys via less suitable roads such as Main Road, Bealings Road & Felixstowe Road to reach BT, Tesco & Ipswich. Rat-running & speeding on these roads is already an issue.  The Transport Assessments included with the application largely ignore traffic impact on Martlesham & focus on Woodbridge. It is unreasonable to

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		assume that residents would mostly shop, work & access services in Woodbridge and ignore Martlesham & Ipswich.
		The Council has concerns about the safety of the accesses proposed with poor visibility splays and opportunities to join the traffic at busy times. It notes that the access in Top Street is over what used to be a 10-15 feet deep pit, now filled in to make an even slope. It is concerned in case the land is unstable. This access is also between 2 properties which would suffer from loss of amenity, noise and air pollution.
6	SP15 Landscape & Townscape and saved policy AP212	SP15 "This strategy will extend to towns & villages where sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected where known; or more generally avoided where development in these locations would lead to coalescence. The location of such sites will be designated through the Site Allocations & Area Specific Policies, Area Action Plan or Neighbourhood Development Plan."  Saved policy AP212 deals specifically with this area:  Ipswich Fringe: Open character of land between Settlements  13.16 In defining the physical limits boundaries, the District Council supports the objective of Structure Plan Policy IP5 to retain the separate identity of
		the various Villages and settlements around the edge of Ipswich and prevent their coalescence with Ipswich, with each other or with Woodbridge. The District Council considers this to be a particularly important objective and will, therefore, also assess any applications for development against the following policy:  POLICY AP212 Ipswich Fringe: Open character of land between Settlements The District Council will seek to maintain the open character of the land which separates Villages on the Ipswich Eastern Fringe from each other and from Ipswich and Woodbridge, including Rushmere Street from Rushmere; Martlesham Heath from Martlesham; and Martlesham from Woodbridge.  This application is clearly contrary to policies SP15 & AP212 because it seeks to fill open space land between Martlesham & Woodbridge.
7	SP29 Countryside	"The Countryside comprises an important economic, social and environmental asset within the district which it is important to sustain. The strategy in respect of new development outside the physical limits of those settlements defined as Major Centres, Towns, Key and Local Service Centres or in accordance with Policy SP28, is that it will be limited to that which of necessity requires to be located there and accords with other relevant policies within the Core Strategy (e.g. Policies SP7 or DM13); or would otherwise accord with special circumstances outlined in paragraph 55 of the NPPF."
		The Council can identify no special circumstances or policies which would support this development outside the physical limits of the settlements.

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		Furthermore the density proposed is out of keeping with adjacent properties which are in an area to be protected from development, saved policy AP28.
8	DM3 Housing in the Countryside	This proposal for 215 houses does not meet the criteria for new housing in the countryside: (a) Replacement dwelling; (b) Sub division of a larger dwelling to meet local need; (c) Affordable housing on an exception site; (d) Conversions of existing buildings; (e) Minor infilling; or (f) development which would accord with special circumstances of paragraph 55 of the NPPF.
9	DM28 Flood Risk	The area downhill from the site is flood cell 12, which recently suffered flood damage to the north wall defence. The Council supports the comments of Suffolk County Council Flood & Water Management who find the layout of surface water drainage unacceptable.
10	Saved Policy AP214	The land in question is the subject of this specific saved policy & it is clear that development would be unacceptable:  Ipswich Fringe: Ipswich Road/Sandy Lane, Martlesham
		13.23 The open land between the A12 and Sandy Lane is currently used for horticulture and agriculture, with two small groups of dwellings north of the railway bridge and at The Street, close to its junction with Sandy Lane. The land clearly forms part of the valley of the River Fynn, which is itself an extension to the Area of Outstanding Natural Beauty. The valley to the west has been designated as a Special Landscape Area and, if it were not for the presence of such intrusive features as sodium lighting columns and untidy horticultural and agricultural buildings, this particular area would be of a similar quality and designated as part of the Special Landscape Area. Nevertheless, it is important in visual terms, particularly in views from the adjacent AONB, and creates a significant open space barrier between Woodbridge and Martlesham. With some enhancement it could reach the same standard as the remainder of the Fynn Valley. Such enhancement could include general tree and hedge planting, the removal of lighting columns and the remains of the old A12, and the screening of eyesores.
		13.24 More development would not be appropriate as it would spoil the landscape further, be contrary to the general policy seeking to protect the Countryside (AP 8), and the policy which seeks to prevent the coalescence of Woodbridge and Martlesham (AP212).
		POLICY AP214 Ipswich Fringe: Ipswich Road/Sandy Lane, Martlesham The land lying between Sandy Lane and the A12, as shown on the Proposals Map, is considered to be a prominent and essential component of the Fynn Valley, lying between the Special Landscape Area to the west and the Area of Outstanding Natural Beauty. The District Council will encourage enhancement measures which improve the landscape of this area to the same quality as that to the west.
11	Emerging Neighbourhood Plan (NP)	The boundary area for the NP was only established in May 2015 due to circumstances beyond the control of the NP team & despite having submitted a first boundary application in July 2013. Work began on the Martlesham Neighbourhood Plan in 2013; surveys, public meetings, other forms of consultation with parishioners & local businesses etc. have taken place. The NP is therefore in an advanced stage of completion which

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		should be given due weight in any planning decisions.
		Policies to preserve open spaces, the Countryside and prevent coalescence between Martlesham and Woodbridge are achieved by existing Local Plan saved policies. Suffolk Coastal District Council has given assurances that these will remain in force until the NP policies are finalised.
		The NP will seek to limit development in Martlesham to that identified in policy SP2 and will substantially maintain protection against further developments outside the designated village envelope.
		Over 80% of respondents to a NP questionnaire in 2014 considered it very important to maintain open space between Martlesham and Woodbridge. Therefore, the Neighbourhood Plan will not be allocating this land to housing development.
12	Site Allocations & Area Specific	In the SCDC consultation the only development identified in Martlesham (in addition to the 2000 homes south of Adastral Park) as 'suitable' by the
	policies	planning authority was 9 houses in Black Tiles Lane and 72-112 houses on
		land at and surrounding Woodbridge Town FC. The SHLAA status for the
		Gladman Development site was "not suitable" on the grounds that it is an area to be protected from development, coalescence and poor access.
13	Other considerations	The high voltage underground power lines for the East Anglia ONE wind farm (and possible subsequent wind farms) will cross the site. The high voltage power cables will create an electromagnetic field which will be at its strongest immediately above the cables and adjacent to housing. The children's play area & designated green space is likely to be sited directly over the power cables. There remains uncertainty over the health risks involved and it would therefore seem very unwise, without clear knowledge, to choose this site for dense housing.

Susan Robertson Clerk to Martlesham Parish Council 15 January 2016

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Date: 15 January 2016

Our ref: 173973

Your ref: DC/15/4788/OUT



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

#### BY EMAIL ONLY

Phil Perkin
Planning Officer
Planning and Coastal Management
Suffolk Coastal and Waveney District Councils

Dear Mr Perkin.

Planning consultation: DC/15/4788/OUT - Land And Buildings To East of Bridge Farm, Top Street, Martlesham, Suffolk for Gladman Developments Limited

Thank you for your consultation on the above. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'), Wildlife and Countryside Act 1981 (as amended).

#### **Further information Required.**

Natural England advises that further information is required to rule out a likely significant effect on the Deben Estuary Special Protection Area.

There is potential for housing developments to generate increased recreational activity, particularly dog walking, which can result in disturbance impacts to designated bird species on designated sites (for examples of recreational disturbance see Ravenscroft *et al.* (2007), Excell & O'Mahony, 2013).

Within Suffolk Coastal District, this issue is addressed in the core strategy, and appropriate mitigation is identified. This comprises; A 1Km separation of developments from designated sites, improvements to local green space, the provision of a new country park, and the provision of wardening and visitor management measures (See Landscape Partnership 2011).

This development is additional to the Core Strategy allocations, and as such will not have been assessed as part of the Core Strategy Appropriate Assessment. We therefore advise the need to consider the impacts of this additional development alone or in combination with those allocations, and with any other 'windfall developments'. The core strategy appropriate assessment sets the context for these considerations.

Impacts on designated sites other than the Deben Estuary Special Protection Area/Ramsar, Site of Special Scientific Interest

We agree with the conclusion in the Habitats Regulations Assessment (HRA) submitted with the proposal, that there are not likely to be significant additional *direct* impacts on the Sandlings SPA as



a result of the development. This is because the travelling distance by car is greater than 8km, which is the threshold provided in the Core Strategy Appropriate Assessment beyond which there are unlikely to be regular visits resulting in direct impacts. However, it is still likely that recreational visits from the development would contribute a small proportion towards district wide recreational impacts on Natura 2000 sites, and the contribution of the proposed development in-combination with the Core Strategy allocations should be considered (see the SCDC Core Strategy Appropriate Assessment for details of the in-combination assessment and mitigation proposals).

#### Impacts on the Deben Estuary SPA/R, SSSI

## Visits by foot

The development is within 390m of the Deben Estuary SPA. At this range residents would be expected to regularly visit the SPA on foot (up to 1.3km), and by car (up to 8km), particularly for dog walking, thus contributing to increased recreational pressure and disturbance to birds on the Deben SPA (See Landscape Partnership, 2011).

It is notable that the development is closer than the 1km threshold used in the core strategy appropriate assessment to guard against recreational visits by foot to designated sites from new developments. In order to prevent direct access by foot, the IHRA states that the corner of the development adjacent to the Deben Estuary will be fenced and screened so that a direct route is no longer available. Removing the available access point onto Sandy Lane from the application site provides a ready and effective way of reducing direct impact by increasing the distance that people will need to walk to gain access to the SPA. However, a mechanism needs to be in place to monitor effectiveness and carry out maintenance in perpetuity, and further detail of how this would be achieved needs to be provided before Natural England can agree as to whether this mitigation proposal would enable a conclusion of no likely significant effect to be reached.

#### Visits by car

The HRA does not discuss the potential for recreational visits by car. The SCDC Core strategy recognises that housing developments can result in regular recreational visits to Natura 2000 sites within 8Km drive by car, for dog walking. For this development, busy and well used car parks next to the Deben at Woodbridge, Martlesham, and Waldringfield are within range. The IHRA should therefore consider how many additional visits are likely to these car parks, alone or in-combination with other proposals, and assess their likely impact on Natura 2000 features. (see the SCDC Core Strategy Appropriate Assessment for details).

#### **Green Infrastructure Provision**

In order to reduce regular visits to SPAs for developments within 8km, the Core Strategy AA recommends that improvements are made to convenient local green space for routine use, thus reducing the demand for visits to designated sites. In this case significant potential for local green space provision is described, including green infrastructure within the site, and connections to local rights of way and surrounding green space. However, the detail of how this would be designed to provide suitable and attractive routes for dog walking and thus an attractive alternative to visits to the SPA, is not stated. This information could be provided by reference to the guidelines in Jenkinson (2013), along with a consideration of the numbers of people already using the local green space from surrounding housing, and the additional numbers as a result of this development. The overall aim is to provide dog walking routes which are likely to be suitable and attractive (for example, with dog bins, off lead areas, route of at least 2.6km) for regular on site walking. There should also be provision for monitoring and if necessary adjusting the routes to ensure they are effective.

#### **Residual impact**

While the availability of local green space is likely to reduce visits to car parks on the Deben SPA to an extent, in our opinion there is likely to be a component of regular visits to the SPA as it is within



the 8km zone within which car visits are likely, and because of the draw of attractive coastal locations. The car parks around the Deben Estuary are particularly sensitive to increased recreational use because much of the development in the core strategy is close to the estuary and the limited number of access points are likely to be used by visitors from multiple developments. An estimate of the likely residual recreational disturbance impact should therefore be provided.

#### **Visitor Management Plan**

The Deben Estuary is highly sensitive to recreational impacts from housing developments within 8km driving distance. Given this sensitivity, it is Natural England's advice that, in line with the requirements of the Core Strategy Appropriate Assessment, where developments are likely to result in residual impacts on designated sites, wardening and visitor management measures should be established, guided by a visitor management plans, to manage and monitor recreational access and birds on the site. We consider that such a plan, led by SCDC, should be established for the Deben Estuary; developments resulting in residual impact on the site should make a proportionate contribution to the provision of these measures.

Natural England also has general concerns as to whether there are any mechanisms in place to collect developer contributions to deliver any necessary strategic mitigation measures such as visitor access management measures and the long term management of any greenspace provided. We would therefore welcome further discussion with you on this issue.

# Landscape Advice Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB)

We are not able to carry out a site visit in order to fully assess the potential impacts of this scheme, but the site is a very sensitive one being within the immediate setting of the AONB. Consequently the development could have a significant impact on the statutory purpose of the designated landscape.

We understand that the AONB Officer is providing Suffolk Coastal District Council with detailed landscape advice based on direct knowledge of the site, its immediate and wider landscape setting and potential impacts on the area's documented Special Qualities. The AONB are particularly concerned that the proposed screening mitigation will not be sufficient to reduce those impacts to the extent anticipated by the Landscape and Visual Impact Assessment. We strongly recommend that this advice is given very careful consideration in determining this application.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter <u>only</u> please contact John Jackson on 0300 060 1979. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

Yours sincerely,

John Jackson Norfolk and Suffolk Team

References:

**Excell, A & O'Mahony, K (2013)** The River Deben Estuary – Ornithological Importance and Status for Waterbirds. Summary Report to the Deben Estuary Partnership –Environment, Landscape and Archaeology Group.



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**Jenkinson, S. (2013)** Planning for dog ownership in new developments: reducing conflict – adding value - Access and greenspace design guidance for planners and developers. Document for East Hampshire District Council, the Kennel Club and Whitehill and Bordon EcoTown by Access and Countryside Management. <a href="http://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf">http://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf</a>

**Landscape Partnership (2011)** Appropriate Assessment for Suffolk Coastal District Core Strategy <a href="http://www.suffolkcoastal.gov.uk/assets/Documents/LDF/D2b/AAReportNov2011.pdf">http://www.suffolkcoastal.gov.uk/assets/Documents/LDF/D2b/AAReportNov2011.pdf</a>

Ravenscroft *et al.* (2007) Disturbance to waterbirds wintering in the Stour-Orwell SPA <a href="http://www.suffolkcoastandheaths.org/assets/Projects--Partnerships/Stour--Orwell/Recreation-Disturbance-Report-Final-low-quality.pdf">http://www.suffolkcoastandheaths.org/assets/Projects--Partnerships/Stour--Orwell/Recreation-Disturbance-Report-Final-low-quality.pdf</a>





67 Thoroughfare Woodbridge Suffolk IP12 1AH

Your Ref: DC/15/4788 17 January 2016

Dear Madam

## For the Attention of Michaelle Coupe, Senior Planning Officer: Outline Planning Application for up to 215 dwellings at Dukes Park Ipswich Road Martlesham Suffolk

The River Deben Association objects to this planning application with respect to the effect on the River Deben environs:

- a) The light from the estate, both direct and reflective, will be very noticeable from Martlesham Creek and the River Deben (see attached photographs) and will cause further problems for the natural wildlife and tranquillity of the area. The views from both banks of Martlesham Creek are remarkably beautiful, especially at sunset, and this development will badly affect them.
- b) There would be a significant increase in road traffic pollution adjacent to the constantly busy junction of Ipswich Road and the A12 and adjacent ANOB and the SSSI. It could also have an impact on the Deben Estuary RAMSAR and the tranquility of the river environs. It would contravene the policies 3.2.28 and 3.3.41 of the Deben Estuary Plan.

Yours faithfully

Robin Whittle

Chairman of the River Deben Association

From: Mel Bentley [mailto:mel.bentley@rushmere-st-andrew.org.uk] Sent: 17 January 2016 21:16

To: d.c.admin

Subject: Comments on planning application DC/15/4788/OUT

CD4.12

Dear Planning Team,

Please accept Rushmere St Andrew Parish Council's planning application comments as detailed below: -

Planning Application DC/15/4788/OUT - Land and Buildings To The East Of Bridge Farm Top Street Martlesham Suffolk IP12 4RB

Although not a statutory consultee on this application Rushmere St Andrew Parish Council considers that it should comment on the basis that this application, should it receive approval, will place additional traffic loading on the Al214 Ipswich feeder road, which in its current condition will be unsustainable.

This will in turn force additional traffic onto the Playford Road 'rat run' and subsequently through to the village part of Rushmere St Andrew.

There are also concerns regards the sufficient provision of primary and secondary education places given that local schools are at saturation point.

The point we are trying to make is that the whole infrastructure of the area requires upgrading before further additional housing schemes can be considered.

#### Regards

(Mr.) Mel Bentley - Clerk,

Rushmere St Andrew Parish Council

email: mel.bentley@rushmere-st-andrew.org.uk web: www.rushmerestandrew.onesuffolk.net

01473 711509 Tel: Rushmere St Andrew Parish Council PO Box 456 Rushmere St Andrew Ipswich IP4 5WH

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CD4.13

From: Paula Booth [mailto:Paula.Booth@suffolk.gov.uk]

Sent: 18 January 2016 16:02

To: d.c.admin

Subject: DC/15/4788/OUT East of Bridge Farm, Top Street Martlesham

DC/15/4788/OUT Outline planning application for up to 215 residential dwellings (including up to 33% affordable housing), a Convenience Store (Use Class A1, up to 400sq.m gross/280sq.m net) with associated car parking. Demolition of existing structures, introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, vehicular access from Ipswich Road and Top Street and associated ancillary works. All matters to be reserved with the exception of the site access. | Land And Buildings To The East Of Bridge Farm Top Street Martlesham Suffolk IP12 4RB

# Setting of the AONB

The site is located adjacent to the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB), with views of the proposed development would be clearly visible from within the AONB, in particular from public viewpoints along Martlesham Creek including the Long Distance Walk, The Sandlings Walk. We have considered how the development relates to the local landscape character and the potential impacts that a development of this scale could have on the special qualities of this nationally designated AONB.

Reference should be made to the Statutory AONB Management Plan, the report detailing the Special Qualities of the AONB and the AONB Partnership's Position Statement in relation to development within the setting of the AONB. When determining this application, regard should be given to the primary purpose of the AONB: to conserve and enhance natural beauty.

#### Potential Landscape Impact

The landscape is of the rolling valley farmland character type and the Suffolk Landscape Character Assessment Guidance Notes point out that the spatial relationship of this landscape to the adjacent valley floor means that change and development here can have a profound visual impact on the adjoining valley floor landscape type. Settlement extension in a valley side landscape is likely to have a significant visual impact and adversely affect the character of the landscape, including that of the adjoining valley floor. We consider this to be very much the case at this site. The submitted Landscape and Visual Impact Assessment identifies that without mitigation the impact of the development would be major. This poses the question of whether the proposed mitigation is deliverable and likely to be effective. The proposed landscape buffer to the immediate north of the railway line is unlikely to have any significant benefit in terms of screening the development from views taken from the public viewpoints at Martlesham Creek. The landscaping strip through the centre of the site, which appears to be determined by the routing of the East Anglia One cable corridor, has serious limitations which would reduce the effectiveness of any planting scheme, such as restrictions of the type of planting. This is crucial, given the sloping nature of the site and the desirable mature height of the landscaping required to be effective in screening what would be a highly visible new "roofscape" on the side of the valley. We note that the photographs used within the LVIA are taken when trees

and hedgerows are in leaf and would recommend that the applicant provide winter photographs and assessment of views to give an accurate representation of the visibility of the site.

We consider that the major adverse impact upon the AONB likely to be caused by this development. We do not consider that the proposal in its current form is acceptable, or able to effectively mitigate the predicted major landscape effects. We do not consider that the proposal contributes to the conservation and enhancement of natural beauty and consider it is likely to have a significant adverse landscape impact on the AONB.

Potential impacts on nearby designated sites

Almost the entire Deben estuary carries International, European and National environmental designations protecting important habitat, wintering birds and local wildlife. The proposed development site is within close proximity of the Deben Estuary Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and Ramsar. The Deben Estuary Plan identifies current pressures on the estuary and notes that Martlesham Creek is already a well-used area for recreation. The addition of c. 215 dwellings within a very short walk of the estuary will undoubtedly lead to increased recreational disturbance on the estuary.

This is of particular concern here, with the SPA features The Deben Estuary Plan policy 3.6.60 states: Seek to minimise and put in place measures to mitigate pressure and disturbance within the estuary area. Promote and facilitate the adoption of a range of mitigation measures which are appropriate to particular sites and levels of disturbance. A number of suggested measured to minimise disturbance are also identified in the Deben Estuary Plan. Should the Local Planning Authority be minded to approve the proposal, it is essential that mitigation measures are determined, secured by condition and implemented in consultation with the relevant bodies and that their predicted effectiveness is fully understood at an early stage, prior to the determination of this application.

Given the close proximity of important designated habitats, we do not consider that the proposal in its current form will be able to mitigate the impacts of increased pressures on the estuary effectively.

#### Paula Booth

Area of Outstanding Natural Beauty (AONB) Officer Dedham Vale AONB and Stour Valley Project t: 01394 445225 m: 07921 404693 w: dedhamvalestourvalley.org Suffolk Coast & Heaths AONB t: 01394 445225 m: 07921 404693 w: suffolkcoastandheaths.org

Address: Dock Lane, Melton, Woodbridge, Suffolk, IP12 1PE

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our ref

your ref DC/15/4788/OUT

please ask for Robert Hobbs direct dial 01473 432931

email robert.hobbs@ipswich.gov.uk



Grafton House 15-17 Russell Road Ipswich Suffolk IP1 2DE

www.ipswich.gov.uk

Head of Planning and Coastal Management Suffolk Coastal District Council Melton Hill Woodbridge Suffolk IP12 1AU

**FAO Phil Perkin** 

(sent via e-mail to d.c.admin@eastsuffolk.gov.uk)

18th January 2016

Dear Mr Perkin

# Land and Buildings to East of Bridge Farm, Top Street, Martlesham

Thank you for the opportunity to comment on the above planning application in respect of up to 215 dwellings and a convenience store on land East of Bridge Farm, Top Street, Marltesham. Ipswich Borough Council would like to make the following comments.

# **Suffolk Coastal Development Plan**

The proposed development should be considered through the development plan process, which we understand is through a neighbourhood plan in this instance. The appropriate infrastructure needs can then be considered in the context of the emerging development plan documents, and also any requirements in respect of Habitats Regulation Assessment mitigation.

Yours sincerely

Robert Hobbs

Planning Policy Team Leader

For Martyn Fulcher

Planning and Development Manager



Little Hall Market Place Lavenham Suffolk CO10 9QZ Telephone (01787) 247179 Fax (01787) 248341 email sps@suffolksociety.org www.suffolksociety.org

18 January 2016

Mr Philip Ridley

Head of Planning Services

Suffolk Coastal District Council

Council Offices

Melton Hill

Woodbridge IP12 1AU

FAO: Mr Phil Perkin

Dear Mr. Perkin,

DC/15/4788/OUT Outline planning application for up to 215 residential dwellings, a Convenience Store with associated car parking. Demolition of existing structures, introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, vehicular access from Ipswich Road and Top Street and associated ancillary works. Dukes Park Ipswich Road Martlesham.

#### Introduction

The Suffolk Preservation Society ('the Society') objects to the above outline application for up to 215 new houses on a greenfield site which lies in countryside outside the physical limits boundaries of both Woodbridge and Martlesham, where policies of restraint apply. The Society objects as the site, in its undeveloped form, currently prevents the coalescence of Martlesham and Woodbridge and allows views across the Coast and Heaths AONB to the East.

# 5 Year Housing Land Supply

In the submission the applicant claims that the lpa cannot demonstrate a 5 year housing land supply and that therefore NPPF para. 49 which states that "relevant local policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites" applies. To substantiate this claim the applicant cites two appeal cases where the Inspector stated that SCDC did not have the require 5 year housing land supply in place. However in both cases the appeal documentation was submitted to the Inspector prior to the publication of the most up-to-date figures. The current Suffolk Coastal District Council

Housing Land Assessment (published June 2015) states that the local authority can now demonstrate a supply of 5.12 years of housing land and therefore the Society considers that policies within the 2013 Core Strategy including SP1 (Sustainable Development), SP2 (Housing numbers and distribution), SP15 (Landscape and Townscape), and SP26 (Woodbridge) all apply.

#### 'Saved' Local Policies

The 2015 Site Allocations Preferred Options consultation document does not allocate sites for Martlesham or Woodbridge as these will be covered in their emerging Neighbourhood Plans. The document confirms, in Appendix 2, that Neighbourhood Plans will on adoption, provide an up to date set of planning policies against which planning applications will be determined. It states that the remaining "saved" policies from the old Suffolk Coastal Local Plan will gradually be phased out – either replaced or deleted as no longer applicable. Therefore prior to the completion and adoption of the Neighbourhood Plans relevant 'saved' policies will continue to apply.

To support this, we would highlight an appeal decision from June 2015 regarding a housing application in Rushmere (APP/J3530/W/15/3005420) in which the Inspector confirmed that saved policies AP212 and AP228 were not to be considered out-of-date and, despite there not being a 5 year housing supply at the time, were material considerations as they did not specifically relate to housing. The Society therefore considers 'saved' policies AP212 Ipswich Fringe: Open character of land between Settlements and AP214 Ipswich Fringe: Ipswich Road/Sandy Lane, Martlesham to be particularly relevant to this application.

# **Principle of Development**

The development site is within countryside outside the physical limits of Martlesham. Policy SP29 Countryside states that 'new development outside the physical limits .... will be limited to that which of necessity requires to be located there and accords with other relevant policies within the Core Strategy'. The 2015 Site Allocations Preferred Options consultation document states that the planned number of new houses in Martlesham between 2010 and 2027 is already met by completions and permissions, and therefore the necessity to develop this site has not been demonstrated.

The site currently has both landscape value, lying between the Coast and Heaths AONB and a Special Landscape Area, and maintains a separation between the built up areas of Woodbridge to the north and Martlesham to the south. The supporting text to saved policy AP214 explains that the area has existing intrusive features which preclude its inclusion within a SLA but goes on to state that nevertheless, it is important in visual terms, particularly in views from the adjacent AONB, and creates a significant open space barrier between Woodbridge and Martlesham. Furthermore it states that more development would not be appropriate as it would spoil the landscape further.

The Society considers that the proposed development will be prominent within the landscape when viewed from Top Street and public footpaths due to the elevated sloping nature of the site. It will form an intrusive feature within the undeveloped buffer between Martlesham and Woodbridge. The proposal is therefore contrary to policy AP212, which seeks to maintain the open character of the land which separates (inter alia) Martlesham from Woodbridge, and also SP15 Landscape and Townscape which aims to restrict development which would lead to the coalescence of settlements.

Policy SP26 Woodbridge aims for new development to present an attractive 'gateway' into the Area of Outstanding Natural Beauty where the scale of new development and standard of design reflects that function. The Dukes Park development immediately adjacent to the proposed development site is a very low density housing development which presents an acceptable transition between the urban edge of Woodbridge and the AONB. The Society does not consider that this would be successfully achieved by the 215 dwellings and other associated development proposed.

Moreover the 2014 SHLAA confirmed that the site (site 453) is unsuitable for development due to it being an area to be protected from development, has poor access and would create coalescence of the two settlements.

#### Conclusion

For the above sound planning reasons the Society contends that the application is contrary to local policies SP15, SP29 and SP26 and 'saved' policies AP212 and AP214. We do not feel that the applicant has demonstrated a necessity to develop this site, contrary to SP29, and therefore urge that this application is resisted.

We trust that you will find these comments helpful in the assessment of this application.

Yours faithfully

Fiona Cairns

**Director MRTPI IHBC** 

Tiese (e)

Cc: - Jo Rogers - SPS District Chair

Martlesham Parish Council

Woodbridge Town Council

Woodbridge Society



# EAST OF ENGLAND OFFICE

Mr Phil Perkin
Suffolk Coastal District Council
Melton Hill
Woodbridge
Suffolk
IP12 1AU
2 8 Jan 236

Direct Dial: 01223 582721

Our ref: W: P00497076

25 January 2016

Dear Mr Perkin

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015 LAND AND BUILDINGS TO THE EAST OF BRIDGE FARM, TOP STREET, MARTLESHAM, SUFFOLK, IP12 4RB Application No DC/15/4788/OUT

Thank you for your letter of 20 January 2016 notifying Historic England of the scheme for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

# Recommendation

The application(s) should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

Yours sincerely

**David Eve** 

Inspector of Historic Buildings and Areas E-mail: david.eve@HistoricEngland.org.uk



\*Stonewall
DIVERSITY CHAMPION



Phil Perkin Planning Department Suffolk Coastal District Council Melton Hill, Woodbridge IP12 1AU

27/01/2016

Dear Phil,

# RE: DC/15/4788/OUT Outline planning application for up to 215 residential dwellings. Land and Buildings to the East of Bridge Farm, Top Street, Martlesham

Thank you for sending us details of this application, we have the following comments:

We have read the ecological survey reports (Ecological Appraisal, FPCR, Nov 2015; Reptile Survey, FPCR, Nov 2015 and Information to Inform a Habitats Regulations Assessment, Ecology Solutions, Nov 2015) and we note the conclusions of the consultants.

From the Development Framework Plan (drawing 6106-L-01-P) it is unclear whether the hedgerows currently present on the site are to be fully or partially retained, or whether they are proposed to be removed. In particular hedgerow 1 along the northern boundary of the site has been judged as of 'moderately high' ecological value in the Ecological Appraisal. We recommend that as many of the existing hedgerows as possible should be retained and beneficially managed as part of the proposal. Where retention is not practical compensation planting must be provided.

Surveys have identified that the site supports a 'Good' population of common lizard and it is understood that habitat which supports this species will be lost as part of the proposed development. The Reptile Survey report identifies translocation to an onsite receptor area as the appropriate mitigation technique. Whilst in principle this appears an acceptable mitigation method, it must be ensured that the proposed receptor area is suitable to support translocated animals. It must also be ensured that the proposed eventual use for the land in which the receptor area is located is compatible with its long term maintenance as suitable reptile habitat. We would recommend that the details of the required reptile mitigation and habitat management measures are detailed in a Reptile Mitigation Strategy, secured via condition, should permission be granted. Given the legal protection afforded to reptiles, it is essential that all mitigation measures have been fully implemented prior to any development works (including vegetation or ground clearance) taking place on site.

It is noted that the Ecological Appraisal concludes that the site provides suitable habitat for nesting skylark. However, no survey work has been undertaken to quantify the number of territories of this species which are likely to be present. It is not therefore possible to accurately determine the impact of the proposed development on the distribution of this species in the district or the county. Skylark is a UK and Suffolk Priority species and is listed as 'Red' on the Birds of Conservation Concern (BoCC) list. Compensation for the loss of habitat suitable for nesting skylark should therefore be secured, should planning consent be granted. This could be achieved through the creation of skylark nesting plots on nearby arable land.

The Ecological Appraisal also identified that the site provides some suitable habitat for both hedgehog and brown hare, both of which are UK and Suffolk Priority species. It should therefore be ensured that, should consent be granted, the Construction Management Plan



CD4.17

Suffolk Wildlife Trust, Brooke House, Ashbocking, Ipswich, IP6 9JY Tel: 01473 890089

www.suffolkwildlifetrust.org

info@suffolkwildlifetrust.org

Suffolk Wildlife Trust is a registered charity no. 262777

Page No. 47

includes suitable methodology to ensure that these species are not harmed during construction. It should also be ensured that the final design of any development on the site incorporates garden boundaries which are permeable to hedgehogs, particularly through the use of gaps under garden fences.

The site is also considered suitable for foraging and commuting bats, although no surveys have been undertaken to quantify any levels of such activity. Any development at this site should incorporate a sensitive lighting strategy, based on the Suffolk County Council lighting strategy, to ensure that dark corridors are available across the site for nocturnal species.

The Development Framework for the site (drawing 6106-L-01-P) shows the proposed development including a considerable amount of open space and landscape planting, including areas to be managed to enhance their biodiversity value and support protected species. In order to ensure that these areas are maximised for biodiversity an appropriate long term habitat management plan is required. The production and implementation of such a plan should be secured, via planning condition, should consent be granted. The Suffolk rare plant Common Cudweed was also recorded in part of the site; management of the proposed greenspace should incorporate conditions suitable for this species.

Notwithstanding the matters set out above, we request that the recommendations made within the reports are implemented in full, via a condition of planning consent, should permission be granted. We recommend that all the necessary ecological mitigation and compensation measures are detailed within an Ecological Management Plan.

# Habitats Regulations Assessment

The site of the proposed development is less than 500m from the Deben Estuary Special Protection Area (SPA) and the Deben Estuary Ramsar site, these sites are designated for their European nature conservation importance. We note that Natural England have previously provided the applicant with advice on this matter as part of their Discretionary Advice Service (DAS). We note the concerns raised by Natural England at the time of their DAS comments and therefore recommend that they, as the statutory nature conservation organisation, are consulted for further advice on this matter.

From the information provided by in the application it appears that, whilst an attempt has been made to quantify the likely increase in dog walkers accessing the Deben Estuary (and therefore the likely increase in disturbance from this activity), no similar assessment has been undertaken for other potentially damaging activities, including walkers without dogs. We also query the screening out of likely significant effects on the Sandlings SPA due to it being 4.2km from the application site. The findings of the South Sandlings Living Landscape Project Visitor Survey Report<sup>1</sup> indicated that 75% of dog walkers visiting the survey locations lived with 10km and half of all visitors by car to the SPA came from over 8km away. The application site is within these distances of the Sandlings SPA and we therefore believe that the reason for discounting this site from the HRA should be revisited.

In addition, the HRA should also consider cumulative and in-combination impacts arising from other plans and projects. Given the importance of these designated sites, we consider that the above issues are significant and must be addressed prior to the determination of this application.

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

Yours sincerely

James Meyer

Conservation Planner

Creating a **Living Landscape** for Suffolk

From: Jackson, John (NE) [mailto:John.Jackson@naturalengland.org.uk]

Sent: 28 January 2016 10:47

To: d.c.admin

Subject: FAO Phil Perkin re Martlesham Top Street. Natural England Soils comments

Hi Phil,

Not sure of your e-mail hence sent to d.c.admin. Many thanks for our conversation this morning, really helpful. On soils, our comments (which I should have included in our letter), are as follows;

# Soils and Land Quality

From the documents accompanying the consultation we consider this application falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, as the proposed development would not appear to lead to the loss of over 20 ha 'best and most versatile' agricultural land (paragraph 112 of the National Planning Policy Framework).

For this reason we do not propose to make any detailed comments in relation to agricultural land quality and soils, although more general guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend that this is followed. If, however, you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

**Best Regards** 

John

John Jackson
Lead Adviser
Sustainable Development and Field Unit
Norfolk & Suffolk Area Team 09
Natural England
Dragonfly House
2 Gilders Way
NORWICH
NR3 1UB

Please Note New Telephone Number: 020 80 264 866 Mob. 07747 065 256

# www.gov.uk/natural-england

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# Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00010943

Local Planning Authority: Waveney District

Site: Dukes Park Ipswich Road Martlesham Suffolk,

Martlesham

Proposal: Creation of 215 x C3 Dwellings

Planning Application: DC/15/4788/OUT

Prepared by Mark Rhodes

Date 29 January 2016

If you would like to discuss any of the points in this document please contact me on 01733 414690 or email <a href="mailto:planningliaison@anglianwater.co.uk">planningliaison@anglianwater.co.uk</a>

#### **ASSETS**

#### Section 1 - Assets Affected

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

#### **WASTEWATER SERVICES**

# **Section 2 – Wastewater Treatment**

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

# **Section 3 – Foul Sewerage Network**

3.1 Development may lead to an unacceptable risk of flooding downstream. A drainage strategy outlining the proposed discharge point and foul water pumped rate will need to be submitted in support of the application.

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

# **Section 4 - Surface Water Disposal**

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.
- 4.2 Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

# **Section 5 - Trade Effluent**

5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.

"An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.

Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.

Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."

# **Section 6 – Suggested Planning Conditions**

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

# **Foul Sewerage Network (Section 3)**

#### CONDITION

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

#### **REASON**

To prevent environmental and amenity problems arising from flooding.



Patricia O'Brien Councillor for Martlesham Division Hill House Bucklesham Ipswich, IP10 OBU

Mr Philip Ridley Suffolk Coastal Planning Dept. Suffolk Coastal District Council Woodbridge, Suffolk

Dear Mr Ridley,

# <u>Planning Application DC/15/4788 – Land and Buildings to east of Bridge Farm, Top Street, Martlesham:</u>

Planning Application DC/15/4672 - Land to East of Bell Lane, Kesgrave.

As you are aware I have long campaigned against major housing development in the area I represent, namely Martlesham (Adastral Park), and I write to endorse Martlesham Parish Council in their objections to the above applications

My objections to these developments remain the same as those for Adastral Park, namely inadequate infrastructure, loss of amenity through loss of countryside, density and, as I have strongly argued, the increase in traffic. Increased traffic is already blighting an area of outstanding natural beauty. The chaos that ensues, when an accident occurs between Copdock and Seven Hills (an ever increasing occurrence, major holdups wk beginning 10<sup>th</sup> Jan) is evidence of future traffic disruption/frustration when new build, as proposed, plus an expanded Port, inevitably bring a significant further growth in traffic.

I ask the question "Does SCDC truly believe in its slogan 'Where quality of life counts'? If it does then listen to your communities, take regard for Local Neighbourhood Plans, particularly that of Martlesham, whose efforts should be commended, not ignored.

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Patricia O'Brien

#### DEBEN ESTUARY PARTNERSHIP

# Application DC/15/4788/OUT

Outline Planning application for up to 215 residential dwellings (including up to 33% affordable housing), a Convenience Store (Use Class A1, up to 400sq.m gross/280sq.m net) with associated car parking. Demolition of existing structures, introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, vehicular access from Ipswich Road and Top Street and associated ancillary works

The proposed development is within some 450 metres of the Deben Estuary. It spreads across the high ground on the northern side of Martlesham Creek, bringing major development into an otherwise rural area. It is adjacent to the AONB and clearly visible from the Special Landscape Area of the Deben Estuary.

The Deben Estuary is relatively small but provides a high quality landscape of great diversity. The estuary landscape is highly valued for its rural peace and tranquillity. and despite the proximity of the built-up areas of Kesgrave and Martlesham, its mostly wooded skyline allows only glimpses of urban development. The proposed development is over and above the requirements of the Local Plan and presents acceptable impact on the visual integrity of a sensitive and special landscape.

The visual intrusion of the development will have a major impact on the riverscape and the landscape of the Deben Estuary as seen from the river. (None of the 'view points' noted in the application were from the water – or from the Sutton shore.) Planting within the site is addressed but does not offer any substantial woodland belt that would be needed to screen the visually intrusive new buildings from Martlesham Creek and from the main river channel at Kysoin Point. The Deben Estuary Plan refers to 'high standards for the built environment, ensuring new build is sensitive to the estuary topography, is unobtrusive and sits comfortably within the riverscape'.

The landscape quality and immediate estuary countryside is an important social and economic asset which enhances the wider area. It is evident that the income that visitors bring to the area is being driven by the characteristics of the environment. It is undoubtedly the combination of the special landscape, interesting places to visit, pleasant accommodation and opportunities for quiet recreation that generates the tourist economy. By allowing development which materially detracts from the special landscape quality of the estuary its value to the wider visitor economy will be threatened.

As a part of the AONB the Deben Estuary is a category 4 protected area as recognised by the International Union for the Conservation of Nature (IUCN). It is of international importance for the breeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries and is part of the Natura 2000 network.

The Estuary is designated as a Special Protection Area (SPA), a Ramsar site - for regularly supporting internationally important numbers of wintering birds. It is a Site of Special Scientific Interest (SSSI) - for populations of overwintering waders and wild fowl. In addition the estuary is notable for its special estuarine habitats – it contains 40% Suffolk's saltmarsh – and it attracts nationally important numbers of migratory waterfowl. Many of the birds associated with the surrounding farmland are listed as Suffolk Priority Species and also classed as Species of Conservation Concern.

The proximity of the development means that estuary paths, particularly along river walls on either side of Martlesham Creek, will attract many daily walkers, with or without dogs. The recurring presence of people, constant disturbance – movement along the top of the wall, dogs running across saltmarsh - will have a considerable, negative impact on feeding and roosting birds. The

present vulnerability of some designated sites will be further undermined - sites in a poor ecological condition are likely to suffer further deterioration as a result of additional disturbance.

Retention and conservation of this environment is of great importance, not only for local, Suffolk people but at a national and international level. The Deben Estuary Partnership wish to express grave concern that this proposal will have a major, detrimental impact on the Deben Estuary

Christine Block

For the Deben Estuary Partnership

44 Ferry Road, Bawdsey,

Tel: 01394 411660

CD4.22

#### Dear Michaelle

Woodbridge Society Planning Group have objections to the following two applications

#### 1. DC/4572/ADI & 4767/LBC 27 Thoroughfare

The group felt that the rule for no internally illuminated signs on Thoroughfare should be maintained and that part of the application should be rejected.

#### 2. DC/15/4788/OUT

There was a very strong and unanimous agreement in the group that the access from the proposed development onto Ipswich Road would be dangerous given the poor visibility particularly in the direction of Woodbridge due to the curve in the road. Although Ipswich Road has a 30mph speed limit the busy traffic is travelling downhill and in reality is often accelerating.

3. I am attaching a snippet of video taken about 3.30pm on Saturday 19th December at the end of Cumberland Street of the Fish Bar and its new sign. It does not seem to have the sign on continuously but it was on for some time on Saturday and I have noticed it on several occasions previously.

Happy Christmas.

Jane.
Jane Brenner
8 Central Maltings
Crown Place
Woodbridge
Suffolk IP12 1BS
Home: 01394 385799
jane@titlepage.org

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