

Gladman Developments Limited

Land off Duke's Park, Woodbridge

Suffolk Coastal District Council

Planning & Affordable Housing Statement



November 2015

CONTENTS

Executive Summary	5
1 INTRODUCTION	8
1.1 Context	8
1.2 The Site and Surroundings.....	8
1.3 Planning History	9
1.4 EIA Screening & Scoping.....	9
1.5 The Application Proposals.....	9
Introduction.....	9
Public Consultation	9
Planning Obligations and Conditions	9
1.6 Delivery	10
1.1 Utilities	10
2 HOUSING NEED	12
2.1 Introduction	12
2.2 National Context.....	12
2.3 National Planning Policy Framework Summary	12
2.4 Planning Policy Guidance.....	13
2.5 Housing Requirement.....	14
Adopted Housing Requirement	14
Establishing a Full, Objectively Assessed Housing Need	15
2.6 Five Year Land Supply.....	16
Claimed Supply of Deliverable Housing.....	16
Gladman Assessment of Five Year Housing Land Supply	16
2.7 Interim Conclusion.....	18
3 THE DEVELOPMENT PLAN	20
3.1 Introduction	20
3.2 The Suffolk Coastal District Local Plan (Adopted 1994, incorporating First and Second Alterations – 2001 & 2004) Saved Policies	20
Weight Attributed to Development Plan and its Policies.....	20
Accordance with the Development Plan	21
Interim Conclusion.....	25
3.3 Suffolk Coastal District Core Strategy (July 2013)	25
3.4 Interim Conclusion.....	29
4 OTHER MATERIAL CONSIDERATIONS	31
4.2 Minerals Consultation Zone	31
4.1 East Anglian Offshore Wind Farm (EAOW1)	32
4.2 Site Allocations Issues & Options.....	33
4.3 Neighbourhood Plans.....	33
5 WOODBRIDGE AND THE APPLICATION SITE	34

5.1	Introduction	34
5.2	A Sustainable Settlement	34
5.3	A Sustainable Site	36
5.4	Interim Conclusion.....	37
6	PLANNING BENEFITS.....	38
6.1	Introduction	38
6.2	Social Benefits.....	38
	Provision of Market Housing.....	38
	Provision of Affordable Housing	38
	Public Open Space Provision.....	38
	Local Convenience.....	39
6.3	Economic Benefits	39
6.4	Environmental Benefits	41
	Ecological Biodiversity.....	41
6.5	Interim Conclusion.....	41
7	POTENTIAL IMPACTS	42
7.1	Overview	42
7.2	Landscape.....	42
7.3	Highways.....	42
7.4	Historic Environment.....	42
7.5	Ecology and Arboriculture	43
7.6	Deben Estuary SPA & RAMSAR.....	43
7.7	Flood Risk Surface Water Drainage.....	44
7.8	Construction Period.....	44
7.9	Noise & Air Quality.....	45
7.10	Utilities	45
7.11	Interim Conclusion.....	45
8	CONCLUSIONS AND OVERALL PLANNING BALANCE.....	46
8.1	Housing Need.....	46
8.2	NPPF	46
8.3	Adopted Development Plan.....	46
8.4	Sustainable Development and Key Benefits	46
8.5	Impacts.....	47
8.6	Overall Conclusion	47

Appendices

Appendix 1	Submitted Document List
Appendix 2	Screening opinion
Appendix 3	Scoping Opinion
Appendix 4	Draft Heads of Terms
Appendix 5	Draft Planning Conditions

Appendix 6	Gladman Site Delivery
Appendix 7	Utilities Report
Appendix 8	Gladman Land Supply Assessment
Appendix 9	Policy Compliance Table
Appendix 10	Correspondence with Housing Officer
Appendix 11	Correspondence with Minerals & Waste Officer
Appendix 12	Correspondence with EAOW
Appendix 13	Sustainability Matrix
Appendix 14	Planning Balance Table

EXECUTIVE SUMMARY

Description of Development

The application relates to land off Duke's Park, Woodbridge. It seeks Outline Planning Permission for up to 215 dwellings with public open space and landscape with all matters reserved, except for access and a retail 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

The application is supported by a comprehensive Environmental Statement.

There is a wealth of evidence from figures at the highest levels of the Government and the Bank of England which demonstrate that there is a clear and pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. The development proposal responds directly to those concerns.

Accordance with the Development Plan

The Development Plan for Suffolk Coastal District Council (SCDC) consists of the Core Strategy and a number of saved policies from the Local Plan (Adopted 1994, incorporating First and Second Alterations – 2001 & 2004).

The Local Plan was prepared some time ago, in line with draft Regional Planning Policy. The weight that its policies can be afforded is substantially reduced as the Local Plan policies were only proposed to guide development in the District up until 2006, and they were not prepared in the context of the National Planning Policy Framework (the Framework). The Local Plan policies are therefore substantially out-of-date.

The Core Strategy was adopted by the Council in July 2013 and covers the period from 2010-2027. The Core Strategy was found sound by the Planning Inspectorate (despite the assessed housing need being based on 2010 figures) on the basis that SCDC will commence a review of the housing projections against updated objectively assessed housing needs by 2015.

It is acknowledged that the proposal constitutes a departure from the Development Plan, as the site lies outside the settlement boundary of Woodbridge. However, SCDC cannot demonstrate a 5 year supply of housing which means that, in line with Paragraphs 14 & 49 of the NPPF, the policies relating to housing are out-of-date and the presumption in favour of sustainable development applies.

Housing Requirement & Land Supply

Whilst the SCDC Core Strategy was found sound by the Inspector, this was subject to the Council undertaking a review of the housing projections by 2015, to enable additional land to be identified against updated objectively assessed housing needs, potentially to 2031. Gladman have concerns that whilst the Council stated, at the time of the Core Strategy Examination, that they were working with neighbouring authorities to produce an update of the SHMA, that this work has yet to be undertaken.

There are also significant concern with regards to SCDC's housing target. Gladman believe that the Council's fully objectively housing need will be significantly higher. SCDC also claim that they have a robust five year housing land supply. Gladman believe that SCDC has nearer a 2 year land supply against the current housing target and a more significant shortage against their objectively assessed housing need.

The development proposal responds directly to meeting the housing deficit in SCDC. The proposals serve to assist in remedying the lack of five-year housing land supply in the District.

Sustainable Development and Key Benefits

The accompanying reports show that there are no unacceptable adverse impacts associated with the proposal. Conversely, the proposal provides significant material planning benefits, which weigh heavily in favour of the application proposal. These include;

- Delivering market housing to meet an identified need and where there has been historical persistent under-delivery in a sustainable location;
- The application proposals would deliver 33% (a third) affordable homes (approximately 72 homes) and provide the full range of affordable housing at a time when other schemes might have been unable to deliver policy compliant level of affordable housing. In circumstances where there is a chronic shortage of affordable housing this should be regarded as a significant material benefit which weigh heavily in favour of the application proposals;
- The site will provide 38% (4.87ha) open space and Green infrastructure provision, for the benefit of new residents and the existing wider community. This includes a green 'spine' through the centre of the development running from east to west. This area will comprise new and retained vegetation and a circular footpath;
- A local convenience retail facilities for new and existing residents, reducing private car trips and encourage walking;
- Suffolk Coastal would receive a potential payment of £405,400 in New Homes Bonus and £1.62 million and future Council Tax revenue;
- Wider economic benefits associated with the development including during the construction period and increased spending in the locality as a result of new residents;
- Ecological benefits through the protection and enhancement of existing wildlife corridors and provision of new green infrastructure within the development; and
- Helping to maintain a sustainable rural community and keep key services and facilities such as local schools and shops viable.

There are no significant and demonstrable adverse impacts that would outweigh the benefits of granting permission when assessed against the Framework as a whole. The proposals constitute sustainable development in the context of the three dimensions of sustainable development; environmental, social and economic.

Decision Taking

The presumption in favour of sustainable development set out in national planning guidance confirms that in circumstances where there is no deliverable five-year supply, the policies of the Development Plan for the supply of housing are out of date and the decision-taking test in §14 of the Framework applies. In the absence of any significant and demonstrable harm capable of outweighing the benefits, the presumption in favour of sustainable development is engaged which confirms that development should be approved 'without delay'.

1 INTRODUCTION

1.1 Context

- 1.1.1 This planning statement forms part of the suite documents submitted to Suffolk Coastal District Council (SCDC) by Gladman Developments Ltd (referred to herein after as Gladman) in support of a planning application for:

“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.”

- 1.1.2 The statement sets out the context for the development by providing the background to the proposals including a description of the site and its surroundings and the relevant up-to-date policy framework. It then assesses the proposals against the identified policy framework and the key material considerations and sets out the case in support of development. A full list of documents which accompany this Planning Application can be found at **Appendix 1**.
- 1.1.3 The application is supported by a comprehensive Environmental Statement.

1.2 The Site and Surroundings

- 1.2.1 The site is 12.67 hectare (31.3 acre) field, contained by scrubby hedgerows and mature trees.
- 1.2.2 The northern extent of the development site is defined by the urban edge of Woodbridge. The A12 runs north to south and forms a strong boundary along the western edge of Woodbridge, containing the existing development of the town. The A12 bypasses the site to the west. Adjacent to the north of the development site is Ipswich Road and Top Street. Ipswich Road heads north east into the centre of Woodbridge and west connecting into the A12. Top Street links into Ipswich Road adjacent to the northern boundary of the site and heads south connecting into Martlesham.
- 1.2.3 The site itself is bound to the north east by existing residential development on Duke's Park; to the east by Sandy Lane; to the south by small business uses and the East Suffolk railway line; and to the west by the B1438 (Ipswich Road) and Top Street.
- 1.2.4 The site currently comprises neutral grassland, rabbit grazed ephemeral/short perennial vegetation, hedgerows scattered mature trees, ruderal vegetation and a drainage ditch. There are also a number of small dilapidated building structures on site.
- 1.2.5 Vehicular access to the site is proposed from two main points. The first is off Ipswich Road to the north of the site via a new ghost island priority junction arrangement which would be constructed to adoptable standards to include footways linking into the site. The second access point is to the south west off Top Street.

1.3 Planning History

- 1.3.1 The application site has a planning consent for the laying of cable ducts and associated engineering works in relation to the East Anglian Offshore Windfarm One Project (EAOW1). This is discussed in further detail in Chapter 4 of this statement.

1.4 EIA Screening & Scoping

- 1.4.1 Gladman submitted a Screening Opinion Request to the Council under Regulation 5 of the Town and Country (Environmental Impact Assessment) Regulations 2011 on the 30th July 2014. This was corroborated by the National Planning Casework Unit in their letter dated 28th August 2014 (please see **Appendix 2**).
- 1.4.2 A Scoping response was received by Gladman on 24th November 2014 (**Appendix 3**). The issues identified in the Scoping response have been addressed in the Environmental Statement and other supporting documentation that forms part of this application.

1.5 The Application Proposals

Introduction

- 1.5.1 This application seeks outline planning permission for a residential and retail development with all matters reserved, except for site access. Details of the parameters of the development for which outline permission is sought are included within the Design and Access Statement. Further detail (including precise location of buildings and appearance) will be brought forward at the Reserved Matters stage.
- 1.5.2 In addition, an illustrative Development Framework has been prepared, giving an indication of how the site could be developed, helping to demonstrate the acceptability of the development and having proper regard to the constraints on site. This illustrative Development Framework presents one iteration of how the site could be developed. It is not a fixed layout for determination at this stage.

Public Consultation

- 1.5.3 Gladman has undertaken a public consultation exercise during the preparation of this planning application. Details of this and the way in which the submitted proposal responds to the comments received are set out in the Statement of Community Involvement.

Planning Obligations and Conditions

- 1.5.4 SCDC formally adopted the CIL on Thursday 28 May 2015. The Charging Schedule came into effect on all planning decisions taken from Monday 13 July 2015. The proposed site falls within the Residential Development mid value area, which is currently charged at £90 per square metre.
- 1.5.5 The CIL includes infrastructure (outlined in SCDC's Regulation 123 List) including education, highway improvements, library facilities, police, fire and ambulance infrastructure, health facilities,

leisure and community facilities, off site open space and maintenance, strategic air quality improvements, flooding and coastal defences and provision for waste infrastructure.

- 1.5.6 A payment in line with the adopted CIL will be agreed with SCDC.
- 1.5.7 Gladman will seek to enter into constructive dialogue with SCDC to agree obligations for any necessary and reasonable on and off site provisions which are related in scale and kind to the proposed development and which meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010. Regulation 123 confirms that there should be no duplication between CIL and other infrastructure payments. Draft Heads of Terms can be found at **Appendix 4**.
- 1.5.8 A list of proposed draft Planning Conditions for discussion is included at **Appendix 5**.

1.6 Delivery

- 1.6.1 It is likely that, subject to market conditions, on average around 40 market dwellings would be completed per annum. The affordable housing would be delivered simultaneously alongside the market dwelling completions. Taking into account infrastructure delivery, it is anticipated that the development of the site would take in the order of five years to complete.
- 1.6.2 Attached at **Appendix 6** is table of sites for which Gladman has secured planning permission. It outlines the timescales from initial permission to start on site. This demonstrates that where planning permission has been granted these are sold on to developers as expeditiously as possible and delivered quickly which, in turn, will make a valid contribution to the District wide local housing land supply.
- 1.6.3 SCDC should take into consideration the approach of Gladman and their track record in delivering houses within the 5 year period. In using promotion agreements, and selling sites to house builders at full market value upon consent, Gladman sites deliver houses at a much faster rate than some alternative arrangements. Timing should therefore not prevent the scheme being implemented within 5 years. By comparison, the sites proposed in Neighbourhood Plans, or yet to come forward through the Site Allocations & Area Specific Policies DPD, might be subject to substantial delays. The Inspector at Weedon Bec, Northamptonshire¹ identified the approach by Gladman to represent a Benefit of the appeal proposals at paragraph 59 of their report.

1.1 Utilities

- 1.1.1 Initial investigations have not highlighted any concerns or engineering difficulties with servicing the proposed development with new gas, water, electric or telecommunication connections.
- 1.1.2 New infrastructure and service connection costs are anticipated to be in line with those expected for a standard development of this scale. It should be noted that all Utility Providers have a licence obligation to ensure that any connections to the system comply with all relevant regulations,

¹ Appeal Reference - APP/Y2810/A/14/2228921

legislation and Engineering Recommendations so therefore do not have an adverse effect to the supply and quantity of supply to existing customers.

- 1.1.3 A full Utilities assessment is appended to this statement in **Appendix 7**.

2 HOUSING NEED

2.1 Introduction

- 2.1.1 This section provides a summary of the National Planning Policy Framework and considers the housing need and supply in SCDC.

2.2 National Context

- 2.2.1 There is a wealth of evidence from figures at the highest levels of the Government, the Bank of England and internationally with the European Commission and International Monetary Fund which demonstrate that there is a clear and pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable.

- 2.2.2 On the 12th June 2014 the Chancellor of the Exchequer George Osborne delivered his annual Mansion House speech, where he provided:

“We need to see a lot more homes being built in Britain. The growing demand for housing has to be met by growing supply....I will not stand by and allow this generation, many of whom have been fortunate enough to own their own home, to say to the next generation; we’re pulling up the property ladder behind us. So we will build the houses Britain needs so that more families can have the economic security that comes with home ownership.”

- 2.2.3 The Governor of the Bank of England, Mark Carney, also made further reference to this matter in his speech at the same event on 12th June 2014 stating that:

“The underlying dynamic of the housing market reflects a chronic shortage of housing supply, which the Bank of England can’t tackle directly. Since we are not able to build a single house, I welcome the Chancellor’s announcement tonight of measures to increase housing supply”

2.3 National Planning Policy Framework Summary

- 2.3.1 At the heart of the Framework is the ‘presumption in favour of sustainable development’, seen as the ‘golden thread’ running through plan-making and decision-taking (§14). For plan-making this means meeting objectively assessed needs; for decision-taking this means approving development where it accords with the development plan, or where the Plan is absent, silent or out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted.

- 2.3.2 Paragraph 17 sets out a series of underpinning Core Principles which, inter alia, seek to proactively drive and support sustainable economic development to deliver the homes, business, infrastructure and thriving local places that the country needs; secure high quality design; take account of the different roles and character of different areas; recognise the intrinsic character and beauty of the countryside; contribute to the conservation and enhancement of the natural environment; promote mixed use development and sustainable, accessible development.

- 2.3.3 Paragraphs 18 and 19 of the Framework give significant weight to the need to support economic growth. The Framework calls for a positive approach to new development and amongst other things seeks to boost significantly the supply of housing. LPAs are required to identify a 5 year land supply of deliverable sites for housing development; where the authority has a persistent record of under-delivery against the delivery of housing they should provide an additional 20% flexibility allowance (§ 47). Policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a deliverable five-year supply of sites (§ 49).
- 2.3.4 Developments should be located where the need to travel will be minimised and the use of sustainable modes of transport can be maximised. This should take into account the development needs and opportunities available in rural areas, which differ from those in urban areas (§ 29 and §34). Sustainable development in rural areas should be promoted, with housing located where it will enhance or maintain the vitality of rural communities (§ 55).
- 2.3.5 Paragraph 215 sets out that due weight should be given to development policies in existing plans according to their degree of consistency with the Framework. Paragraph 216 also states that due weight should be given to relevant policies in the emerging plan according to: its stage of preparation, the extent of unresolved objections and their degree of consistency with the Framework.

2.4 Planning Policy Guidance

- 2.4.1 The approach to be adopted to define a housing requirement is set out in PPG, Para 030. This states that:

*'Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, **unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.***

*Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints. **Where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point,** but the weight given to these should take account of the fact that they have not been tested (which could evidence a different housing requirement to the projection, for example because past events that affect the projection are unlikely to occur again or because of market signals) or moderated against relevant constraints (for example environmental or infrastructure'.*

- 2.4.2 Whilst it is acknowledged that the Core Strategy provides a housing requirement that has been considered through Examination, the Inspector relied heavily on now dated policies and evidence. This is explored in further detail below.

2.5 Housing Requirement

Adopted Housing Requirement

- 2.5.1 As discussed in more detail in the subsequent Chapter of this statement, whilst the SCDC Core Strategy was found sound by the Inspector, this was subject to the Council undertaking a review of the housing projections by 2015, to enable additional land to be identified against updated objectively assessed housing needs, potentially to 2031.
- 2.5.2 One of the main issues considered by the Planning Inspectorate during the examination of the SCDC Core Strategy was *'Whether the overall level of housing provision and its distribution are justified and appropriate'*.
- 2.5.3 In his report he states that the Core Strategy provides for up to 7,590 new homes (446 per annum) in the period 2010 to 2027. However, it was not clear from the submitted CS and evidence base as to what the Council considered to be the full, objectively assessed housing needs. This was not a figure outlined in an up to date SHMA document, given the Councils last SHMA was undertaken in 2008.
- 2.5.4 Following further work, through a Housing topic paper, 2010 (Oxford economics - Using the East of England Forecasting Model (EEFM)), it was highlighted that an additional 11,000 extra homes were required over the plan period (approx. 647 dpa). It was then the SCDCs view that this was in fact their objectively assessed housing need, but the plan should not provide for this scale of development at this stage.
- 2.5.5 In his overall conclusions on this issue the inspector outlines that the housing requirement is lower than the objectively assessed need, however he concluded:

'Given the extent of the new work that would be necessary and the need for collaboration with other Councils, a lengthy suspension would be required during which other matters may emerge which would need to be addressed. In verbal evidence the Council indicated that were I to suspend the examination for these reasons they would be likely to withdraw the plan and I am satisfied that in the circumstances this would be the likely outcome. I have therefore considered whether this would be in the interests of achieving sustainable development and significantly boosting the supply of housing in the District.'

'Although 11,000 dwellings is the best available estimate of need at this point it has not been achieved as a result of collaborative working with neighbouring authorities'.

- 2.5.6 The Inspector noted that the relevant policies for the supply of housing should not be considered up-to-date until the Council has demonstrated a 5-year supply of deliverable housing sites. However, in the absence of the CS, the Council would be reliant on an old-style Local Plan, adopted in 2006 with significant parts that are considerably older than that.

- 2.5.7 Therefore, in order to avoid delay it was recommended that the council proceed with Core Strategy figures, with a review in 2015.
- 2.5.8 It is clear from the inspector's report that there are significant concerns with regards to the Council's current objectively assessed housing need. Whilst the Core Strategy was adopted post NPPF, the Inspector's recommendations were made prior to recent Hunston judgment² and the publication of the NPPG, which reiterates the requirement for a fully objectively assessed housing requirement. The Hunston Court of Appeal Judgement (12 December 2013) reinforces the approach and imperative in the Framework for producing and maintaining up-to-date evidence which objectively assesses in full, market and affordable housing need. The outcome of the judgement demonstrates the benefit, and its critical importance when calculating housing land supply. Firstly, correctly establishing an objectively informed housing need position from the outset via up-to-date evidence, to secondly, be in a position to identify the correct unfulfilled need/surplus, for thirdly, having derived the shortfall/surplus from the subsequent sequences, pay regard to the supply of specific deliverable sites to deliver homes in the five year period to meet the identified need.
- 2.5.9 There is a wealth of very recent decisions that substantiate that significant weight may be placed on the most recent evidence of the OAN and that assessments based in recognised projection techniques and models, and based on up to date evidence that can take account of changes in the economy and households, should be given significant weight in the determination of planning applications. These include Tetbury (Appeal Ref APP/F1610/A/12/2165778), Offenham (Ref: APP/H1840/A/13/2203924) and Pulley Lane, Droitwich Spa (APP/H1840/A/13/2199085 and APP/H1840/A/13/2199426).

Establishing a Full, Objectively Assessed Housing Need

- 2.5.10 The Council's most recent evidence with regards to its housing need is, as outlined above, the Housing topic paper, 2010 (Oxford economics - Using the East of England Forecasting Model (EEFM), which highlighted that an additional 11,000 extra homes were required over the plan period. As stated by the Inspector at the Core Strategy Examination, the 11,000 dwellings is the best available estimate of need at that point, though caution should be given to even this figure now as it does not take into account recent guidance or statistics and has not been achieved as a result of collaborative working with neighbouring authorities.
- 2.5.11 Gladman have concerns that whilst the Council stated, at the time of the Core Strategy Examination, that they were working with neighbouring authorities to produce an update of the SHMA, that this work has yet to be undertaken.
- 2.5.12 It is likely, given the publication of additional Government housing and population datasets since the last housing target was set, that SCDC's full objectively assessed housing need will be significantly higher than that proposed in the Core Strategy.

² Hunston Properties Limited v (1) Secretary of State for Communities and Local Government and (2) St Albans City and District Council [2013] EWHC 2678 (Admin).

2.6 Five Year Land Supply

Claimed Supply of Deliverable Housing

2.6.1 The Council's claimed deliverable supply, as at 31st March 2015, is set out in their Housing Land Supply Assessment 2015 (June 2015). This covers the five year period between 1st April 2016 to 31st March 2021. In the statement SCDC claim that they have a 5.12 year supply, equivalent to an oversupply of 67 dwellings over five years.

2.6.2 However, a number of recent appeal decisions in SCDC have concluded that the Council is unable to demonstrate a five year supply. The first is that at Haven Exchange, Flexistowe, Suffolk (Ref APP/J3530/W/15/3011347) states that:

'The Council acknowledges that it is unable to demonstrate a 5 year supply of deliverable housing land, with the supply figure at 4.3 years³'.

2.6.3 The second is for a site north of Woods Lane, Melton, near Woodbridge (2015) (Ref: APP/J3530/A/14/2225141) which states:

'The subsequent closing submissions from the main parties to this appeal are unambiguous that the Council cannot demonstrate a five year supply of deliverable sites for housing'. (Para 17)

Gladman Assessment of Five Year Housing Land Supply

2.6.4 SCDC's current calculation, outlined above, is based on the following:

- a. A buffer of 5%. The Council argue that they do not have a record of persistent under-delivery of housing and therefore it is not necessary to increase the buffer to 20%.
- b. Undersupply spread across the plan period (Liverpool Method);
- c. All sites included within the Council's five year land supply are deliverable; and
- d. The dwelling requirement should not be updated in light of the requirement for a review of their objectively assessed need this year.

2.6.5 In relation to the first point, Gladman contend that SCDC should be using a 20% buffer. At the Core Strategy Examination 2013, the Inspector accepted that it was appropriate to apply a 5% buffer'. At the time of the Inspectors report, the latest Annual Monitoring Report available was that from 2011 and therefore data running up to this period only. He noted that in the past, there had been a good record of delivery against the former RSS, with the annual average house building rate being exceeded. The table below illustrates this point, with delivery between 2005 and 2009 significantly over delivered against its RSS target (510 dpa).

³ Council's Appeal Statement, Paragraph 4.16.

Date	Housing Target	Housing Delivery
RSS Requirement (510dpa)		
01/02	510	423
02/03	510	571
03/04	510	456
04/05	510	347
05/06	510	902
06/07	510	1,150
07/08	510	694
08/09	510	550
09/10	510	256
Start of Core Strategy Plan Period (465dpa)		
10/11	465	216
11/12	465	270
12/13	465	324
13/14	465	215
14/15	465	427

2.6.6 As such, on this basis, the Inspector concluded that there had not been a persistent under-delivery. However, over the last 3-4 years since 2009 the Council has seen, what Gladman believe to be, persistent under-delivery against both the RSS Requirement and Core Strategy Requirement respectively. As outlined in the table above, recent delivery rates have been between 216 and 328dpa at best, well below the Core Strategy Target of 465dpa.

2.6.7 SCDC spread the undersupply from the first five years of the plan over the remainder of the plan period (ie 11 years). However, the National Planning Policy Guidance document, released in March 2014, states that “Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.” This advocates the use of the Sedgefield method rather than the residual Liverpool method of spreading the undersupply over the remainder of the plan period. Furthermore, the 20% buffer should be applied to the entire five year requirement, including the historic shortfall. This approach has been qualified in numerous appeal decisions, including in a Secretary of State appeal decision dated 2nd July 2014 in relation to major residential developments in the District of Wychavon. In those cases the inspector states at Paragraph 8.46 *inter alia*:

“It is also clear that the 20% buffer should be applied to the entire 5-year requirement (including historic shortfall). The Council could not point to any provision in policy or previous decisions which supports the contention that the 20% buffer should not apply to the historic shortfall”.

2.6.8 If the shortfall is spread over a five-year period and a 20% buffer was added to SCDC's claimed five-year land supply, the annual requirement would be 882dpa, which against their claimed supply would provide 3.3 years of land⁴. This is before a full assessment of land included within the claimed supply is undertaken (see **Appendix 8**).

2.6.9 The third point Gladman make in regards to SCDCs claimed five year calculation relates to the source of 'deliverable' land included within the council's claimed supply. The calculations include 'Sites where principle of development accepted'. In this case, a number of these do not have planning

⁴ Calculation based on information provided in SCDCs Five Year Land Supply (March 2015).

permission, and as such are just sites that SCDC has included following an assessment through the SHLAA.

- 2.6.10 A number of large scale applications included have unrealistic lead times, for example Adastral Park, which had a planning application submitted in 2009 and still awaits a decision. This site is also heavily reliant on large scale infrastructure. Gladman also contend that some sites within its trajectory are undeliverable within the five year time period and include unrealistic completion rates. Should these be taken into account there would be a notable reduction in the level of supply.
- 2.6.11 Calculating SCDCs supply based solely on those identified in their five-year land supply document (2015) as 'deliverable sites' with outstanding planning permissions or with outstanding allocations (including a 10% discount rate), and including a 20% buffer the Council's supply slips to 2.4 years (see **Appendix 8**). Gladman believe that SCDC's objectively assessed housing need will reduce even further against a full objectively assessed housing requirement.
- 2.6.12 With regards to the latter point, the review that SCDC is obliged to undertake in regards to their objectively assessed housing need is likely to change the situation with regards to the annual housing requirement and thus their five year housing land supply position. Calculating the supply against what Gladman believe to be SCDCs true need, and a much higher unconstrained OAN requirement, will reduce the supply further. This should be given consideration and substantial weight by SCDC when considering developable sites such as that proposed.

2.7 Interim Conclusion

- 2.7.1 The UK has a secular problem with inadequate housing supply, which has led to low income and middle income families being priced out of the housing market. National Government recognise that house price inflation is getting to dangerous levels and that building new homes is necessary in order to address this issue.
- 2.7.2 The NPPF is a material consideration to be taken into account in the determination of the application. It is framed as a positive and enabling document, seeking to facilitate sustainable development and growth. Its core principles and policies seek to identify and meet the need for new housing in full, and boost significantly the supply of housing.
- 2.7.3 Gladman have significant concern with regards to both the Council's annual housing target and subsequent five year housing land supply. Gladman contend that a housing target based upon an up to date objectively assessed housing need figure would be an appropriate basis on which to plan for SCDCs housing requirements. Gladman believe that whilst SCDC claim a five year supply, the basis upon which this is calculated is flawed. Initial interrogation of the Councils supply indicates that they have in the region of 2.4 years or below.
- 2.7.4 The development proposal responds directly to meeting the housing deficit in SCDC. The proposals serve to assist in remedying the lack of five year housing land supply in the District.

- 2.7.5 In accordance with paragraph 49 of the Framework relevant policies concerning the supply of housing cannot be considered up-to-date and the presumption in favour of sustainable development set out in paragraph 14 of the Framework is engaged.

3 THE DEVELOPMENT PLAN

3.1 Introduction

3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that a planning applications determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. This is confirmed by Paragraphs 11 and 12 of the National Planning Policy Framework (the Framework), which continues to place importance on the plan-led approach.

3.1.2 The Development Plan for SCDC consists of:

- The Suffolk Coastal Core Strategy (2013)
- The Suffolk Coastal District Local Plan (Adopted 1994, incorporating First and Second Alterations – 2001 & 2004) Saved Policies

3.2 The Suffolk Coastal District Local Plan (Adopted 1994, incorporating First and Second Alterations – 2001 & 2004) Saved Policies

3.2.1 The Suffolk Coastal District Local Plan (SCDLP) (Incorporating First and Second Alterations – 2001 & 2004), was first adopted in 1994. A number of Local Plan policies were saved by the Secretary of State's Direction.

Weight Attributed to Development Plan and its Policies

3.2.2 The SCDLP was prepared in general conformity with the Structure Plan along with the Regional Spatial Strategy, both of which have since been rescinded. The Plan aimed to guide and control development in the District up to 2006. The plan is therefore an 'old-style' Development Plan. Its policies are time-expired, its allocations do not look beyond the end of the plan period to 2006 and on this basis alone, the weight that its policies can be afforded is limited. Therefore these policies are now considerably time-expired and out-of-date.

3.2.3 The Framework makes clear at paragraph 215 that as 12 months have passed since its publication, due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

3.2.4 Contrary to paragraphs 14 and 47 of the Framework, the relevant policies of the SCDLP fail to encourage the delivery of a wide choice of housing and do not plan for a level of housing based on the objectively assessed housing need of the Authority. The weight to be accorded to the relevant policies for the supply of housing within the Local Plan should be reduced.

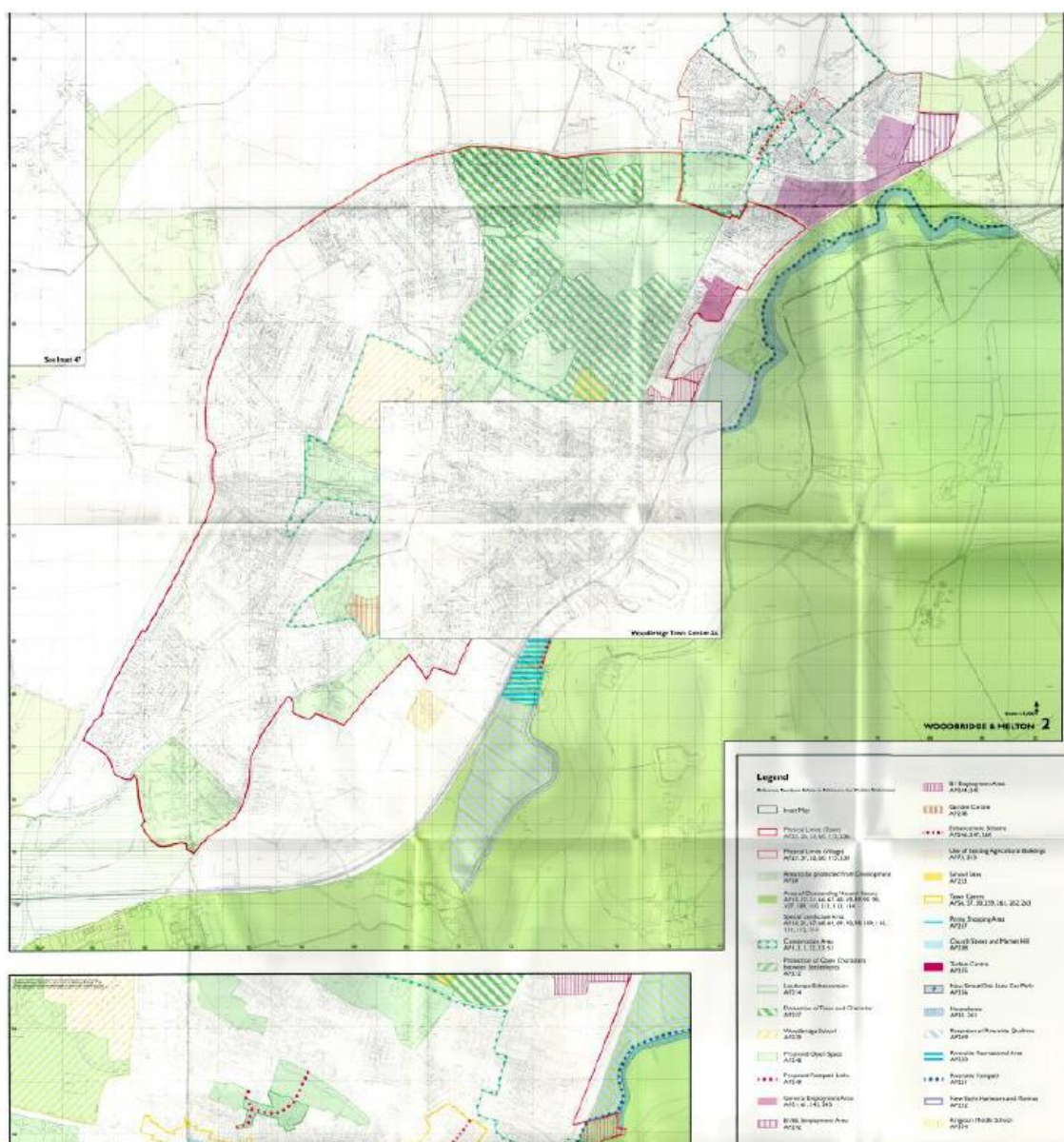
3.2.5 The principle of housing and the site specific policies are dealt with below, however, for completeness the environmental, design and technical development-management policies of the

Development Plan have been considered within a Policy Compliance table, which can be found at **Appendix 9**.

Accordance with the Development Plan

- 3.2.6 The Local Plan proposals map defines the application site as outside of the 'Physical Limits' of the town of Woodbridge and in a location where a Landscape Enhancement Area policy applies – Saved **Policy AP214**.

Figure 1: Local Plan Proposals Map



- 3.2.7 Policy AP214 – Ipswich Fringe – Ipswich Road/Sandy Lane Martlesham states:**

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'.

3.2.8 The explanatory text accompanying the policy goes on to state:

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'.

3.2.9 This policy was set in accordance with the Structure Plan, meaning it is now considerably out-of-date. Since the adoption of the Suffolk Coastal District Local Plan there has been a material change to the planning approach for local designations. Paragraph 215 of the Framework requires weight be given to relevant policies in existing plans according to their degree of consistency with the Framework.

3.2.10 Paragraph 113 of the Framework states that protection of land should be commensurate with its status and appropriate weight should be given to its importance and any local landscape policy should be based against a criteria, to assess the harm of the development on the designation.

3.2.11 The site itself has no National or European designation. Whilst the site lies within close proximity to the Deben Estuary Special Protection Area (SPA)/ Ramsar site, it has been shown in the '*Information for HRA report*' (Ecology Solutions) that accompanies this application, that there will be no significant adverse effect on the SPA/Ramsar site either alone or in combination with other plans or projects. Consequently, an Appropriate Assessment is **not** required and any potential impacts can be mitigated and the presumption in favour of sustainable development, as outlined in Paragraph 14 of the NPPF still applies. Further detail is outlined later in this chapter.

3.2.12 Furthermore, given that the site is not a National or European designation only limited weight can be afforded to Policy AP214, as the development plan is dated and does not make sufficient provision for housing sites to meet current and future needs.

3.2.13 There have been various planning appeals for schemes on land designated under similar 'landscape value' policy designations set by other Local Authorities. These include appeals at Milton Road, Bloxham (Appeal Ref: APP/C3105/A/12/2189191); Winchcombe (Appeal Ref: A/12/2183317); Deddington (Appeal Ref: APP/C3105/Q/13/2201339) and a recent appeal in Banbury (Appeal Ref: APP/C3105/A/13/2203995). Similarly, in such cases these landscape designations, whilst saved policies, were set within outdated Local Plans. In these appeal cases it was found that:

- Emerging policies in the Local Plan no longer carry forward such policies, not least because the policy revisions are no longer up-to-date with the best practice and no longer consistent with the Framework;
- Such policies are not consistent with the Framework, which expects Local Plans to give protection to landscape areas commensurate with their status through criteria-based policies against which development is judged;
- Given the lack of a five-year supply of housing, the sites represented logical and suitable locations for development. The sites would extend built development beyond the settlement edge resulting in a loss of countryside. However this in itself is not a bar to development in a situation where the development plan policies relating to the supply of housing are now out-of-date.

3.2.14 Such points are relevant in this case. The site represents a logical extension to the town which is highly constrained elsewhere and would contribute to meeting the five-year housing land supply across the District. The supporting text to the policy also acknowledges that there are features on the land that mean that the site is not of a quality to that of the surrounding AONB and Special Landscape Area. Therefore, in line with the Framework, protection of land should be commensurate with its status and limited weight given to this policy.

3.2.15 It is considered that the site is very well contained and is influenced by the Ipswich Road and the urban edge of Woodbridge, therefore has a stronger relationship to existing development to the north and west on Top Street, than the wider landscape. The design team have taken particular care to ensure that the siting and design of the development are sensitive to the wider landscape setting. The development proposals include the retention of existing vegetation along the site boundaries and new tree and hedgerow planting where appropriate to create filtered views of the development from surrounding high quality landscape areas.

3.2.16 The site development has no distinctive landscape features and would assimilate into the adjacent residential landscape. It would therefore not unacceptably detract from the overall character and appearance of the surrounding area.

3.2.17 **Policy AP212 – Ipswich Fringe – Open Character of Land between Settlements** seeks to maintain an open character and separation between villages on the Ipswich Eastern Fringe, Ipswich and Woodbridge, which includes the land between Martlesham from Woodbridge.

3.2.18 Gladman contend that this policy should be given limited weight in relation to the proposed site of a number of reasons:

- Gladman submit that development can often be located in settlement gaps, without leading to the visual or physical merging of settlements, eroding the sense of separation between them or resulting the loss of openness and character.
- The application site does not fulfil the description of being 'open character', given the location of the train line, and residential and business properties on Top Street and Sandy Lane. Gladman maintain that the proposal site is a logical extension to the town and

'rounds off' the built up area, with the railway line to the south forming a strong boundary to the settlement. Rather, the land to the south of the railway line along Top Street ensures the separation between the two settlements and open character of the land is not hindered.

- Whilst the text in the Local Plan refers to land between Martlesham and Woodbridge, the site itself has no such policy designation on the Proposals Map. Other areas that clearly fall within the Ipswich Fringe Policy AP212, such as land designated between Martlesham, Rushmere St Andrew and Ipswich, have been clearly defined on the proposals map.

3.2.19 The site is also considered to be subject to Policy **AP236 – Woodbridge & Melton – Restraint. This policy states:**

The strategic policy of restraint on new housing development in Woodbridge/Melton will continue to be applied through the retention of the physical limits boundary, as defined on the Proposals Map. New housing development will, therefore, consist of infilling, groups or small-scale developments, subject to the following:

- *no material adverse impact on the Conservation Areas or Listed Buildings;*
- *no material adverse impact on the urban fringe or setting of the Town (see also Policy AP240);*
- *the avoidance of the loss of areas which are important components of the street scene, character of the Town, or Townscape, eg open spaces or woodland (see also Policy LP237);*
- *access and highway considerations;*
- *other policies of the Local Plan and related Supplementary Planning Guidance'.*

3.2.20 Gladman contend that the adopted settlement boundaries and relevant housing supply policies are not up-to-date and are inconsistent with the policies contained in the Framework.

3.2.21 Paragraph 215 of the Framework states that weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework. It is therefore considered that whilst the 'physical limits boundary' for Woodbridge has not been deleted in the Core Strategy (Appendix D), the development limits set out on the Local Plan should now be given little weight as it conflict with policies within the Framework.

3.2.22 This policy is out-of-date as it restricts all new development beyond the existing built-up limits of the settlements.

3.2.23 The policy also conflicts with policies in the subsequently adopted Core Strategy, which seeks to direct some future housing growth the Woodbridge.

3.2.24 Moreover, this policy is time-expired as the Council does not have a five-year housing land supply and so relevant policies for the supply of housing should not be considered up-to-date. Therefore the policy should be afforded extremely limited weight.

- 3.2.25 Woodbridge is one of the Districts most sustainable towns, which can assist in achieving SCDC's OAN. Therefore, such a policy will undoubtedly prevent the Council meeting its current and future housing needs.
- 3.2.26 **Saved Policy AP56 - Town Centres**, identifies Woodbridge as a defined Town Centre. The policy goes on to outline a number of uses for which town centres are the preferred location, unless there are other overriding material considerations, or if proposals are in accordance with other policies in the Local Plan. The application is accompanied by a Sequential Assessment undertaken by NLP, which addresses this Policy.

Interim Conclusion

- 3.2.27 The SCDLP is a 'pre'-Framework Development Plan which does not plan positively for future development to meet the objectively assessed needs of the area. The "transitional" arrangements in the Framework state that only Development Plan Documents (DPDs) adopted under the Planning and Compulsory Purchase Act 2004 had full weight for twelve months. Given the Local Plan was adopted in 1994 (with subsequent alterations), limited weight should now be given to a large number of these saved policies. This means paragraph 215 of the Framework applies throughout the consideration of this case;

"... due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)".

- 3.2.28 In this case, the policies relevant to the supply of housing are inconsistent with the Framework and therefore can only be accorded limited weight. The development proposals are in accordance with a number of environmental, design and technical development-management policies that can be considered up to date and are relevant to this application. In this case, it is also considered that the saved policies are inconsistent with the Framework, particularly in relation to the physical limits of development and landscape protection.
- 3.2.29 Further, it is evident that SCDC cannot demonstrate the minimum requisite five-year housing land supply, and have a significant shortfall against their recent strategic housing market assessment (as discussed in the following section). In this regard policies relating to the supply of housing, including those which restrict housing, are also out-of-date. The presumption in favour of sustainable development is engaged.

3.3 Suffolk Coastal District Core Strategy (July 2013)

- 3.3.1 The SCDC Local Plan - Core Strategy & Development Management Policies (Core Strategy) was adopted in July 2013. An independent Inspector appointed by the Government examined the soundness of the Core Strategy following its submission to the Secretary of State in May 2012. The Inspector's Report was issued on 6 June 2013. He found the Core Strategy sound and capable of adoption (despite the assessed housing need being based on 2010 figures), subject to a number of main modifications. This was on the grounds that SCDC commence with a review of the housing

- projections by 2015, to enable additional land to be identified against updated objectively assessed housing needs, potentially to 2031, taking advantage of the full 2011 Census information.
- 3.3.2 The spatial and development management policies of significant relevance are dealt with below, however, for completeness the remaining environmental, design and technical development-management policies of relevance have been considered within a Policy Compliance table, which can be found at **Appendix 9**.
- 3.3.3 **Strategic Policy SP2** sets out the proposed housing numbers and overall distribution for the district, making provision for at least 7,900 new homes in the period 2010 to 2027. It states that land for new homes will be distributed in accordance with the Settlement Hierarchy (SP19). The policy also outlines the Council's intention to undertake an early review of the Core Strategy, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the National Planning Policy Framework.
- 3.3.4 In terms of housing distribution, the Core Strategy directs 19% of the total housing growth (1,520 homes over the plan period or 103 dpa) to the 'Towns'. Woodbridge is identified as one of five towns within the settlement hierarchy set out in **Policy SP19**. Whilst the proposed site falls outside the settlement boundary for Woodbridge, it is considered that additional land outside the settlement boundaries of towns such as Woodbridge will be required to facilitate housing growth. Gladman also suggest that these second tier Towns are key sustainable locations to facilitate any further housing growth that may be required following the imminent review of the Council's fully objectively assessed housing need.
- 3.3.5 The Core Strategy does not allocate sites for development; SCDC suggest that is the role of the site specific allocations development plan documents which will follow. Work on these documents (Felixstowe Area Action Plan and the Site Allocations and Area Specific Policies Local Plan document) is not due to complete for some time. In the meantime, the Council has only one outstanding housing allocation remaining from the "old" Local Plan for around 75 dwellings at Rendlesham. Other than that it is primarily reliant on outstanding planning permissions for its five year supply, as other large sites previously allocated or identified, are built out.
- 3.3.6 SCDC's approach to the determination of planning applications during this interim period is set out in paragraph 3.33 of the Core Strategy which states:
- "In the short term however, between adoption of the Core Strategy and the adoption of the subsequent site allocations document (2015), larger housing sites will need to be brought forward to achieve a five year housing land supply. These sites also technically comprise "windfall" but will still be expected to accord with the principles, scale and distribution of development set out in this Core Strategy. In essence, they are sites which, but for timing, would have been allocated in the normal way."*
- 3.3.7 It is evident that SCDC require windfall sites, such as that proposed, to come forward for development to facilitate the delivery of housing to meet their current housing requirement and

five year supply. A large number of additional windfall sites will therefore be required to meet their full OAN.

3.3.8 **Policy SP26** sets out the strategy for Woodbridge, to balance opportunities with the acknowledged physical and environmental constraints, (notably the Deben Estuary with its nature conservation and landscape designations to the east, the A12 to the west, areas at risk from flooding, and its high quality historic built environment) in order to maintain and enhance its roles as the principle market town within the district, an employment centre and a tourist destination. It suggests that further significant expansion of Woodbridge (and Melton) will be sympathetically considered having regard to the local character and key physical thresholds.

3.3.9 The proposed site does not lie within any national landscape designations and as such could be improved through carefully designed development to enhance the southern gateway into Woodbridge. Due to the physical constraints elsewhere within the town (as outlined in Chapter 5) and the fact that the proposed development is well contained, it provides for a sensible and sustainable location for growth.

3.3.10 **Strategic Policy SP9** – 'Retail Centres' states:

"Emphasis within the district will be on maintain and enhancing the viability and vitality of existing retail centres, and making proper provision for new forms of retail distribution..."

3.3.11 Policy SP9 identifies Woodbridge as a Town Centre, but does not specifically reference any sequential approach to site selection – therefore, paragraph 24 of the Framework applies.

3.3.12 The accompanying text to Policy SP9 goes on to state:

"No need has been proven requiring a new retail centre to be provided. However, district/local centre provision will be required to serve new housing development and where appropriate to support new business provision" (para. 3.102)

3.3.13 Policy SP9 does not identify Martlesham Village as a retail centre, although it is designated as a Key Service Centre in the Settlement Hierarchy Classification (Table 4.1).

3.3.14 Table 3.7 (Town Centre Floorspace Capacity – Projections from Retail Study) identifies capacity for 840sq.m net convenience floorspace in Woodbridge by 2025. The application is accompanied by a Sequential Assessment undertaken by NLP, which addresses this policy.

3.3.15 **Strategic Policy SP15** – '**Landscape and Townscape**' aims to protect and enhance the various landscape character areas within the District. Many of the towns and villages in the District are of distinctive historical and architectural value, as well as of landscape value and character. The Council will seek to enhance and preserve these attributes and the quality of life in the generality of urban areas. This strategy extends to towns and villages where sites, gaps, gardens and spaces make an important contribution to a particular location in their undeveloped form; 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 and Area Specific Policies, Area Action Plans or Neighbourhood Development Plan Documents. Until then, those sites currently allocated under Saved Policy AP28 in the Suffolk Coastal Local Plan (incorporating 1st and 2nd Alterations) will continue to be protected.
- 3.3.16 The proposed site does not fall within an area protected by Saved Policy AP28. Whilst it does lie within an area protected by other landscape policies from the Saved Local Plan, as outlined previously, Gladman believe that such policies are inconsistent with the Framework, are significantly time expired, and should be given limited weight due to the Council's absence of a five year housing land supply.
- 3.3.17 **Policy SP26** sets out the strategy for Woodbridge, to balance opportunities with the acknowledged physical and environmental constraints, (notably the Deben Estuary with its nature conservation and landscape designations to the east, the A12 to the west, areas at risk from flooding, and its high quality historic built environment) in order to maintain and enhance its roles as the principle market town within the district, an employment centre and a tourist destination. It suggests that further significant expansion of Woodbridge (and Melton) will be sympathetically considered having regard to the local character and key physical thresholds.
- 3.3.18 The proposed site does not lie within any national landscape designations and as such could be improved through carefully designed development to enhance this southern part of Woodbridge. Due to the physical constraints within the town further expansion on this site is a sustainable location for growth.
- 3.3.19 **Policy DM2** sets out the affordable housing requirements on residential sites suggesting that 1 in 3 units is to be affordable.
- 3.3.20 SCDCs latest 2012/13 AMR (March 2014) states that the
- 'Lack of affordable housing provision within the district is a major problem. Despite new housing stock continuing to be delivered the provision of affordable housing is limited..... During the reporting year 74 affordable homes were completed'.*
- 3.3.21 The delivery of 74 units represents just 16% of the Core Strategy delivery requirement and 22% of the properties actually delivered during this year. This is significantly below the target set out in the Core Strategy.
- 3.3.22 Consultation SCDC has revealed that there are 2,982 on the housing need register, with 696 of these in priority need categories. There are 389 households registered for affordable housing with a preference for Woodbridge, 82 of which are in significant need (Please see **Appendix 10** for relevant Correspondence).
- 3.3.23 In accordance with the Council's adopted policy, the proposed development of up to 215 units will include 33% affordable units (Approximately 72 No.). It is also a significant benefit of the scheme and would address the identified local housing need within Woodbridge.

- 3.3.24 It is considered affordable housing is capable of being secured by condition. A draft condition based on the PINS model condition is included at **Appendix 5**.
- 3.3.25 **Policy DM27** seeks to ensure that new development protects and enhances both biodiversity and geodiversity by minimising potential impacts and maximising opportunities for enhancement and conservation. Development proposals that would cause a direct or indirect adverse effect (alone or combined with other plans or projects) to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species, will not be permitted unless:
- “(i) prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development*; or*
- (ii) with regard to internationally designated sites that the exceptional requirements of Reg. 62 of the Conservation of Habitats and Species Regulations 2010 (as amended) relating to the absence of alternative solutions and Imperative Reasons of Overriding Public Interest have been met.”*
- 3.3.26 The Deben Estuary Special Protection Area (SPA)/ Ramsar site is located to the south and west of the proposed development site, approximately 390m away at its closest point.
- 3.3.27 A report entitled ‘Information to Enable a HRA of the Impacts on the Deben Estuary’ produced by Ecology Solutions accompanies this application. Detailed consideration has been given in this report to the potential significant effects arising in relation to the Deben Estuary SPA/Ramsar site. In summary, in the opinion of Ecology Solutions, following appropriate and detailed assessment, the development proposals would not result in a significant adverse effect on the SPA/Ramsar site either alone or in combination with other plans or projects, and that as such the tests contained within Regulation 61 (1) of the Habitats Regulations would not be failed and that there is no need therefore to undertake an Appropriate Assessment.
- 3.3.28 Consequently, as any potential impacts from the proposed development can be mitigated. Given no Appropriate Assessment is required, Paragraph 119 of the NPPF does not apply and the presumption in favour of sustainable development, as outlined in Paragraph 14 of the NPPF is engaged. This has been noted in various appeal decisions including Oaklands, Ersham Rd, Hailsham (Ref: APP/C1435/A/12/2186147) and Dawlish, Devon Secretary of State decision (Ref: APP/P1133/A/12/2188938).

3.4 Interim Conclusion

- 3.4.1 The adopted Core Strategy does not plan positively for future development to meet the objectively assessed needs of the area. The policies relevant to the supply of housing are inconsistent with the Framework and therefore can only be accorded limited weight. The development proposals are in accordance with a number of environmental, design and technical development-management policies that can be considered up to date and are relevant to this application.

- 3.4.2 Further, it is evident that SCDC cannot demonstrate the minimum requisite five year housing land supply, and in this regard policies relating to the supply of housing are also out-of-date. The presumption in favour of sustainable development is therefore engaged.

4 OTHER MATERIAL CONSIDERATIONS

- 4.1.1 The Scoping response provided by SCDC outlined a number of additional material considerations that are addressed below.

4.2 Minerals Consultation Zone

- 4.2.1 Suffolk County Council indicated within the Scoping Response (**Appendix 3**) that the site lies within a Minerals Consultation Zone. Policy 5 of the Minerals Core Strategy states that:

The Mineral Planning Authority will safeguard:

A) Those areas identified on Map B from proposed development in excess of one hectare which is not in accordance with a Local Development Document.

The MPA will, when consulted by the LPA, object to such development unless it can be shown that the sand and gravel present is not of economic value, or that the mineral will be worked before the development takes place;

- 4.2.2 Upon review of the Minerals Core Strategy Proposals Map and inset plan sit is evident that the Waldringfield Quarry lies some distance to the south of the site. As indicated on the extract below, only the southern tip of the site lies within this consultation zone.
- 4.2.3 Given that a very minimal proportion of the site is included within the consultation zone and the constraints that this part of the site would have, including the railway and existing business uses etc, it is unlikely that it would be either realistic or viable for mineral extraction. Furthermore, the majority of the proposed development would not sterilise or seriously hinder the extraction of mineral deposits of economic value which are capable of being worked.



- 4.2.4 Gladman has had further correspondence with the County Council in regards to this matter (Please see **Appendix 11**). An email dated 20th October 2015 has confirmed that :

'After careful review of the proposals plan, site constraints and its viability for mineral extraction, the County Council can confirm that it is unlikely that any sand or gravel which may be present on site is unlikely to justify extraction as required in Policy 5 of the Minerals Plan. Therefore, having had a more detailed consideration of the site, the full assessment is not required in this specific case'.

4.1 East Anglian Offshore Wind Farm (EAOW1)

- 4.1.1 The EAOW1 project is a 1200MV offshore windfarm off the coast of East Anglia. The planned development is for up to 240 wind turbines to be installed across an area of 300km² in the southern North Sea.

- 4.1.2 The EAOW1 project has consent for a 37km cable route running from a landfall location in Bawdsey to a converter station in Bramford. The route will cross the proposed development site from east to west, requiring a cable corridor width of 75m. A permitted width of 55m within this 75m will be required in order to route the cable in the most appropriate way through the corridor. This 55m cable corridor will only be required during the laying of the cables. Once laid, a permanent easement (allowing right of access to the cables) will be required.

- 4.1.3 Gladman has been in dialogue with the Head of Development at EAOW regarding the proposed location of the cabling corridor and likely easement, to ensure that the residential proposals outlined in the application are deliverable. We have been advised by EAOW that a 30m wide permanent easement for the ducting is sufficient within the 75m cable strip, originally identified and submitted as part of the EAOW1 planning application.

- 4.1.4 EAOW have also agreed that the easement strip through which the cables will run can be used as open space within the site. They have also confirmed that a road can run across the easement at a 90 degree angle.

- 4.1.5 As outlined in the letter from EAOW (attached in **Appendix 12**), at this stage they do not have an exact position as to where the underground cable route will be located, however, they stated that:

'through consultation with Gladman we would envisage a mutually acceptable layout can be agreed. To date we have confirmed that the cable 'will be as near to the railway line as reasonably possible or along such other route as may be agreed between the parties.' EAOW believe the involvement of Gladman is a key element of the final routeing in this area and will enable this by providing as much detail as is reasonably possible.'

- 4.1.6 Given this application is made in Outline, it seeks to agree the principle of residential development. Whilst it includes illustrative plans, they are provided simply to demonstrate that the potential cable route has been taken into account and that development on this site is achievable, incorporating the EAOW1 project.

- 4.1.7 The onshore construction works for East Anglia ONE will commence in 2017 and spread over a period of two years. At this stage we could not confirm when construction would take place at this part of the route, this information would be determined after appointment of a contractor to undertake the works. However, it is envisaged that an agreed route for the cabling can be agreed in advance of the construction phase, thus enabling detailed plans to be approved by SCDC should outline planning be granted.
- 4.1.8 Gladman has taken account of the East Anglia One Limited (EAOL) Development Consent Order where protective provisions with the relevant parties have been stipulated by EAOW. They have formed the basis of an agreement with existing infrastructure on the site, and informed the illustrative plans for the site.

4.2 Site Allocations Issues & Options

- 4.2.1 The Council started work on a Site Allocations Document, consulting on the Issues and Options stage of the plan in 2013/14. The proposed site was considered by the Council (Ref: 453 – Land at and surrounding Bridge Farm, Top Street, Martlesham). The Council noted within this assessment that the site should be proposed for affordable housing and recreation. This therefore indicates that the Council, in principal, consider that the site is suitable for residential uses. A copy of this document can be found at:

<http://www.suffolkcoastal.gov.uk/assets/Documents/LDF/Site-specific/L-R/Martlesham.pdf>

4.3 Neighbourhood Plans

- 4.3.1 The Woodbridge and Martlesham Neighbourhood Plan Areas were designated on 5th May 2015. The site falls within the Martlesham area. Both plans are in the very early stages of development as such have no weight at this time.

5 WOODBRIDGE AND THE APPLICATION SITE

5.1 Introduction

- 5.1.1 This section demonstrates that the development proposals provide for a high quality development in a sustainable location close to the services and facilities in the town and will provide significant economic support for the vitality and viability of Woodbridge.
- 5.1.2 The figure below demonstrates the situation of the development site in relation to the wider District.

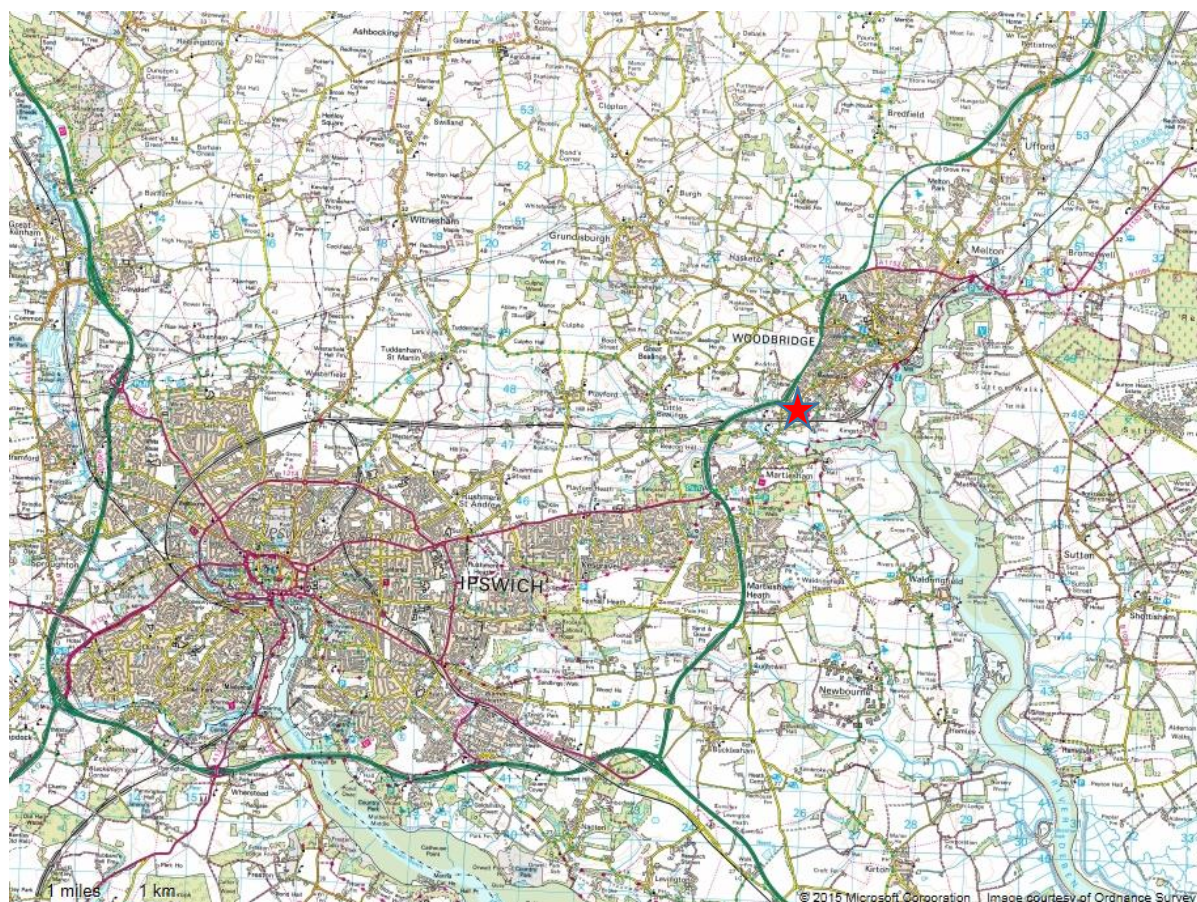


Figure 2: Development Location

5.2 A Sustainable Settlement

- 5.2.1 Woodbridge is a large historic market town with a large number of services and facilities which are within easy walking and cycling distance of the site, including: food shops, a post office and public houses. Kyson Primary School is also located within 2km of the site.
- 5.2.2 Woodbridge has good public transport links both around the town itself and to wider surrounding areas such as Ipswich and Flexistowe.
- 5.2.3 There are a large number of bus services that provide links to Ipswich, Orford, Stradbroke, Flexistowe, Bucklesham, Otley College and Kesgrave & Farlingaye High Schools. The most frequent

- is the bus no.173 to Flexistowe via Kirton, Trimley. This runs approximately every two and a half hours between 9.50am and 17.52pm.
- 5.2.4 The nearest bus stops are located just past the Ipswich Road / Old Barrack Road / California staggered junction. These stops are approximately 450m north-east of the site from the proposed main access on Ipswich Road. Whilst the nearest bust stops from the access off Sandy Lane are located approximately 400m on California.
- 5.2.5 To support the development proposals, two new bus stops will be provided along Ipswich Road. The westbound bus stop will be situated adjacent to the convenience store, whilst the eastbound bus stop will be located on the opposite side of the carriageway with a pedestrian island to facilitate access. The bus stops will be located within 400m of each of the dwellings and will therefore provide an attractive travel option for residents. The stops will be served by the existing bus services which operate along Ipswich Road, including the 71, 72, 73A, 121, 173, 936 and the 972, and will therefore provide access to Woodbridge town centre, Sudbourne, Saxmundham, Ipswich and Old Felixstowe. Further details with regards to the bus stops are provided in the Transport Assessment, which forms part of the application. The design of the stops will be agreed with Suffolk County Council as part of the detailed planning application.
- 5.2.6 Woodbridge is the nearest railway station from the site and is located approximately 2km away from the Ipswich Road site access, and therefore is within walking distance of the development site. Additionally, the location of the railway station will provides opportunities for linked sustainable trips by bus and cycling to more regional and national destinations. The main service operates between Ipswich and Lowestoft every hour. There is 1 train per day which extends to Harwich International to connect with the Stena Line ferry to Hoek van Holland.
- 5.2.7 The main route through Woodbridge calls at the following stops:
- (Harwich International) Ipswich - Westerfield - Woodbridge - Melton - Wickham Market - Saxmundham - Darsham - Halesworth - Brampton (Request Stop) - Beccles - Oulton Broad South – Lowestoft.
- 5.2.8 The site is therefore highly accessible by public transport. For more detailed information relating to public transport, please see the Transport Assessment. The Sustainability Matrix which accompanies this Planning Statement, is enclosed at **Appendix 13**.
- 5.2.9 Broadband provision is available in Woodbridge. An online enquiry with BT using a local postcode shows that internet services with speeds of up to 76 Mbs download are currently available⁵. Speeds of this level are sufficient to support home working and most home based businesses. This will aid reduction in vehicle travel thus increasing levels of sustainability.

⁵ http://www.productsandservices.bt.com/products/broadband-packages/?s_intcid=con_hpbop_bb
Using postcode: IP12 4RB

- 5.2.10 Whilst Woodbridge is a sustainable settlement, there is a need to balance the housing stock and growth in future such that new housing development adds variety and choice to the local housing market and addresses a wider range of housing needs.

5.3 A Sustainable Site

- 5.3.1 The figure below outlines the site, edged red, in the context of the wider town. The different shades of Green highlight the areas of Special Landscape, registered parks and gardens, AONB or Ramsar sites. The brown indicates the current built form.
- 5.3.2 As this illustrates, the site forms a logical extension to the south of the town, respecting the current settlement constraints (including the SPA and A12) and pattern of growth. It is a well contained site, with very distinct boundaries.

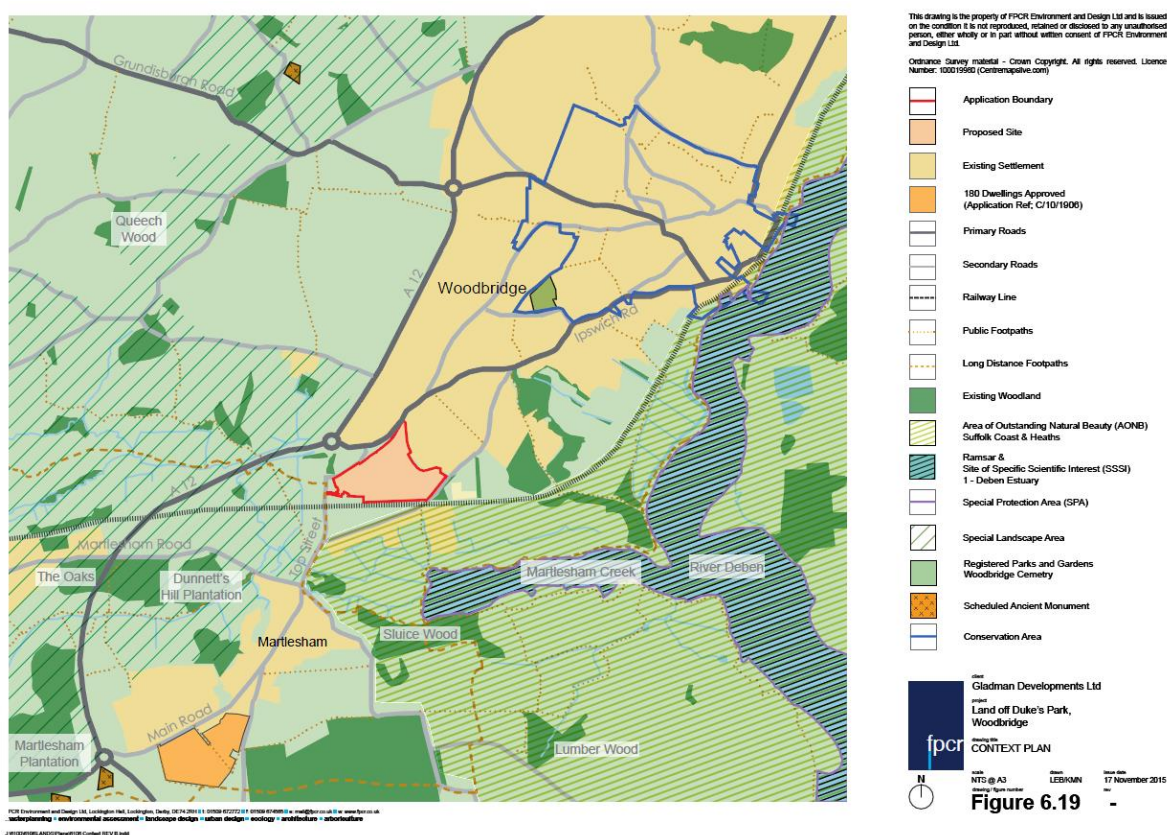


Figure 3: Constraints Plan

- 5.3.3 The following is relevant in terms of the site's suitability and locational sustainability for development:
- The site is well related to the existing built form, in a sustainable location with good access to local services and facilities (see Transport Assessment and Sustainability Matrix for further detail).
 - The site is well contained within the landscape and important trees and other landscape features are retained or translocated where possible.

- The local highway network has capacity to accommodate the additional traffic associated with the development without adverse impact.

5.3.4 A number of trees are protected by a TPO on site, these will be retained and protected. The site is located within Flood Zone 1. Therefore the probability of flooding is less than 1 in 1000 (<0.1%).

5.3.5 The site itself is not the subject of any formal historic or environmental designations and it is not situated within a Conservation Area.

5.3.6 The Landscape and Visual Impact Appraisal (LVIA) submitted as part of the ES that the overall landscape and visual effects are considered to be moderate adverse. The application site is influenced by Suffolk Coast & Heath AONB, the Deben Estuary SPA and the Special Landscape Area. The development proposal has considered the approach to landscape and the context of the site, and will successfully integrate into the surroundings without any unacceptable landscape or visual effects.

5.3.7 The technical information submitted in support of the application confirms that there are no technical constraints to the development of the site. The site is not in an area where specific policies in the Framework indicate that development should be restricted.

5.4 Interim Conclusion

5.4.1 Woodbridge is a sustainable settlement that is socially and economically sustainable when judged against the Framework within its spatial context. The application site is situated within a demonstrably suitable and appropriate location to host new housing development.

5.4.2 The following section examines all three dimensions of sustainable development in greater detail.

6 PLANNING BENEFITS

6.1 Introduction

- 6.1.1 The purpose of this section is to set out the benefits of the development proposals in relation to the three dimensions of sustainability: social, economic and environmental.

6.2 Social Benefits

Provision of Market Housing

- Boosting the supply of land for housing, providing for high quality market family housing within a sustainable location. The development proposals will make a valuable contribution to the 5 year supply of SCDC.
- The proposed development of up to 215 net additional dwellings will provide a balanced mix of dwellings providing a choice of type and size in response to the identified housing demand and market assessment for SCDC. New homes in Woodbridge will enable people to access the housing market locally rather than being forced to move away due to lack of available housing.
- The proposals will assist in helping to maintain and enhance the vitality of the community.

Provision of Affordable Housing

- There is a substantial need for affordable homes across the District, and particularly in Woodbridge itself. The application proposals would deliver 33% (approximately 72 No.) affordable homes and provide the full range of affordable housing at a time when other schemes might have been unable to deliver policy compliant level of affordable housing. This should be regarded as a significant material benefit of the application proposals.

Public Open Space Provision

- The development proposals provide 4.87ha (38 %) of new public open space and a high quality landscape setting, along with an equipped children's play area. This will be provided in a central location, close to the circular footpath within the site to ensure that it is accessible to both new and existing residents. Additional informal recreation space and landscaping will also be included to meet the needs of the new residents. The provision of open space is in accordance with Policy SP16 and SP17 of the Suffolk Coastal Core Strategy.
- A central green spine through the development, running from east to west. This area will comprise new and retained vegetation, an attenuation basin and a circular footpath.
- Create a housing site with pedestrian links, including a circular route of 1.7km. This area will provide features of interest including a wooded area in the west, pond habitat in the

east, grassland throughout and new boundary hedgerows. This open space will be managed to provide benefits to wildlife and will provide an attractive alternative to walks associated with the SPA. The convenience will be further enhanced with the removal direct access links to the SPA via Sandy Lane with the installation of hedgerows and fencing along this boundary.

Local Convenience

- Providing local convenience retail facilities for new and existing residents, reducing private car trips and encourage walking;

6.3 Economic Benefits

- 6.3.1 The application is accompanied by an Economic Statement which sets out the economic context and the economic benefits, including construction and operational impacts of the proposed development. This is summarised in Figure 4 below.

Summary of Impacts

Figure 1.1 Potential Impacts of Proposed Development

Land Off Duke's Park, Woodbridge Socio-Economic Impact Assessment

CONSTRUCTION IMPACT

£25.1m

INVESTMENT IN CONSTRUCTION



FTE CONSTRUCTION JOBS OVER A 5 YEAR BUILD PERIOD
WITH A FURTHER 20 FTE JOBS OVER A 1 YEAR BUILD
PERIOD FOR THE RETAIL UNIT

HOUSEHOLD SPENDING



£0.7m IN
WOODBIDGE

£1.2m IN SUFFOLK
COASTAL

ANNUAL HOUSEHOLD SPENDING IN
THE LOCAL ECONOMY

UP TO 10 JOBS IN
SUFFOLK COASTAL

HOUSEHOLD EXPENDITURE WOULD
DIRECTLY SUPPORT UP TO 15 LOCAL JOBS



The development would support the continued viability of local retail
and other businesses in Woodbridge and the wider area

DEMAND FOR SERVICES

Development helps to sustain local services
and facilities

up to 10 JOBS

SUPPORTED BY DEMAND FOR PUBLIC
SERVICES

NEW HOMES BONUS

Development supports investment in local
infrastructure and facilities

£1.62m

TO SUFFOLK COASTAL COUNCIL OVER A SIX
YEAR PERIOD THROUGH THE NEW HOMES
BONUS SCHEME

LABOUR SUPPLY IMPACT



ESTIMATED 290-330 ECONOMICALLY ACTIVE RESIDENTS OF THE NEW DEVELOPMENT

www.regeneris.co.uk

regeneris
CONSULTING & RESEARCH

Figure 4: Economic Infographic

6.4 Environmental Benefits

Ecological Biodiversity

6.4.1 The proposal aims to conserve and enhance biodiversity through:

- Significant areas of planting to provide green infrastructure, ecology and wildlife benefits. Habitat creation measures to ensure biodiversity is retained with enhanced hedgerows, green corridors. The central Green spine through the development will include a wooded area in the west, pond habitat in the east, grassland throughout and new boundary hedgerows. This open space will be managed to provide benefits to wildlife and will provide an attractive alternative to walks associated with the SPA. The convenience will be further enhanced with the removal direct access links to the SPA via Sandy Lane with the installation of hedgerows and fencing along this boundary.
- Provision of domestic gardens which provide an opportunity to improve biodiversity over and above agricultural use.
- These measures will ensure a net biodiversity gain in accordance with requirements of Paragraphs 9 and 118 of the Framework.

6.5 Interim Conclusion

- 6.5.1 The benefits of the development proposals are considerable. The proposals will make a significant contribution towards meeting the social elements of sustainability through: providing homes to meet the objectively assessed housing needs of SCDC and making a valuable contribution towards five year housing land supply. Further the application proposals will provide 33% affordable housing (Approximately 72. No.) in circumstances where there is a chronic shortage in the District, this should be regarded as a significant material benefit. The development proposals will assist in helping to maintain and enhance the vitality of Woodbridge Town Centre.
- 6.5.2 In addition to the delivery of housing the proposals will also deliver an number of economic benefits which include New Homes Bonus totalling £405,400, 90 FTE jobs in construction, a further 20 indirect jobs in associated industries and total gross expenditure of £1.2 million annually in Suffolk Coastal District.
- 6.5.3 There are also a number of environmental benefits associated with the development proposals which include the provision of green infrastructure, the protection and the enhancement of existing wildlife corridors.
- 6.5.4 These benefits are considered to weigh heavily in favour of the development proposals.

7 POTENTIAL IMPACTS

7.1 Overview

- 7.1.1 The potential impacts of the development proposals have been considered in the technical reports submitted in support of the application; these are considered below.

7.2 Landscape

- 7.2.1 The application site is already heavily influenced by the urban edge of Woodbridge. Development will result in an obvious and permanent change to the character of the application site however the proposals will aim to retain notable existing landscape features where evident such as boundary hedgerows and mature hedgerow trees. Therefore it is considered that the proposed development within the application site will result in an overall moderate adverse effect in terms of landscape character and visual impact. The proposals are well contained adjacent to the existing urban context. Consequently development on the site would not be significantly visible in the wider surroundings of the area and where visible it would be seen within the wider urban context of Woodbridge.

7.3 Highways

- 7.3.1 Access is proposed into the site from in the form of a ghost island priority junction off Ipswich Road and an access point off Top Street. The results of the TA illustrate that the assessed junctions would operate within capacity and would adequately accommodate development proposals. The increase in traffic arising from the development will not unacceptably impact the local road network.

7.4 Historic Environment

- 7.4.1 It has been demonstrated that the proposed development has the potential to impact only one built heritage asset, the Grade II Listed Building at 1 Top Street. However, through a suitably designed scheme any potential harm can be reduced to negligible.
- 7.4.2 A geophysical survey undertaken across the site in July 2014 recorded no anomalies of archaeological interest.
- 7.4.3 Isolated finds dating to the Bronze Age and Roman period have been found on the site.
- 7.4.4 These could have been stray finds brought into the site from elsewhere or they could represent evidence of occupational activity on the site. The results of the recent geophysical survey would suggest that occupational activity is unlikely.
- 7.4.5 As such, the site has a moderate to good potential for further artefactual evidence dating from the Bronze Age and Roman period. Past ground disturbance caused by quarrying or terracing in the west and south-west of the site will have removed any archaeological remains within these areas.

- 7.4.6 Should further archaeological assessment will be required by the Suffolk County Council Archaeological Officer, in order to secure the modest archaeological interest on the site, this work can follow planning permission secured by a standard planning condition.

7.5 Ecology and Arboriculture

- 7.5.1 The Ecological interest of the site will be secured through the protection and enhancement of existing wildlife corridors and the provision of new green infrastructure within the development. Further this approach would provide for the active long-term ecological management across the site where presently there is no such regime in place and, with the implementation of the type of management plan proposed, the potential for biodiversity enhancements would also exist.
- 7.5.2 The Arboriculture Impact Assessment confirms that a tree preservation order, namely No: 78 Dukes Hill, Martlesham (1967), which applies to a number of trees present on the edge of the site and therefore statutory constraints apply to the eastern boundary of the proposed development in respect of trees. The majority of the existing tree and hedgerow cover will be retained and incorporated into the new development and new tree planting will be included to soften the built environment and link the existing vegetation surrounding the site. Despite the loss of some moderate and low quality trees, on balance, tree cover will increase across the site offering improved arboricultural and wildlife benefits for the new occupants of the development and wider residential area.

7.6 Deben Estuary SPA & RAMSAR

- 7.6.1 The Deben Estuary SPA/Ramsar site is located to the south and west of the Application Site, approximately 390m away at its closest point.
- 7.6.2 A 'Information for HRA Assessment', undertaken by Ecology Solutions, accompanies this application. This provides a detailed assessment of the implications of the Development Proposals on the Deben Estuary SPA in view of the European sites conservation objectives.
- 7.6.3 The findings of this work are set out within this Information to enable a Habitats Regulations Assessment document, such that SCDC as the competent authority, in exercising its duties under the Habitats Regulations, has all the necessary information before it to considering the application.
- 7.6.4 Assessment under Regulation 61 of the Habitats Regulations is required in this instance, since the Application Site lies in close proximity to the Deben Estuary SPA. Consideration has also been given (where relevant) to any additional impacts which could arise in relation to the Deben Estuary SSSI.
- 7.6.5 All potential pathways for significant effects to arise on the SPA as a result of the Development Proposals have been fully examined. Where necessary mitigation / avoidance measures, which are integral to the project, have been described. This assessment has been undertaken with due regard had to relevant legislation, case law and planning decisions, guidance and information provided by Natural England during consultation on the Development Proposals.

- 7.6.6 It is considered that (having adopted a precautionary stance to the assessment) the provision of the mitigation / avoidance measures described within this document would avoid any potential significant adverse effects that the Development Proposals could have on the SPA in the absence of such measures.
- 7.6.7 It has been concluded that there would be no potential likely significant (adverse) effects on the Deben Estuary SPA when the Development Proposals are considered either alone or in combination with other plans/projects, in light of the tests at Regulation 61(1) of the Habitats Regulations. There is therefore no requirement to undertake an Appropriate Assessment of the Development Proposals. No additional impacts have been identified in relation to Deben Estuary SSSI and no additional mitigation measures are considered necessary.
- 7.6.8 As the project alone or in combination would not contribute to an overall significant effect that may have an adverse impact on the integrity of the SPA (in view of the SPA conservation objectives), or adverse impacts on the SSSI, the Development Proposals would by definition be acceptable, subject to securing the mitigation and avoidance measures proposed. In those terms the competent authority could legally and safely grant consent for the proposed plan/project.
- 7.6.9 Consequently, as any potential impacts from the proposed development can be mitigated. Given no Appropriate Assessment is required, Paragraph 119 of the NPPF does not apply and the presumption in favour of sustainable development, as outlined in Paragraph 14 of the NPPF is engaged.

7.7 Flood Risk Surface Water Drainage

- 7.7.1 The submitted Flood Risk Assessment confirms the site is located in Flood Zone 1; an area of low flood risk. The FRA demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of the NPPF.
- 7.7.2 The development should not therefore be precluded on the grounds of flood risk.

7.8 Construction Period

- 7.8.1 The construction stages of the development may have some effects which are short-term, temporary in nature, and local to the site and immediate area. In any event best practice measures will be put in to mitigate any adverse temporary impacts in terms of noise, the operation of construction traffic, plant and machinery or the management of any other related disturbance or nuisance. This is likely to include controls on working hours and dust suppression measures.
- 7.8.2 Consideration of the implications of various issues such as transport, noise and air pollution are given further consideration in the ES that supports this application.
- 7.8.3 It is proposed that the requirement for a Construction Management Plan could be included as a Planning Condition.

7.9 Noise & Air Quality

- 7.9.1 The submitted noise and vibration assessment identified that the dominant noise will be from road traffic, and rail noise from the train line. To achieve the acceptable noise levels in outside areas closest to roads, mitigation would be required. The vibration levels measured near the railway line are below the threshold for a low probability of adverse comment for both daytime and night time.
- 7.9.2 The air quality assessment submitted as part of the application identifies that the traffic generated from the development would not have a significant impact on the existing sensitive receptor locations in 2025 including those in Woodbridge AQMA.
- 7.9.3 Rail emissions and odour within the development are also considered to be not significant within the proposed development.

7.10 Utilities

- 7.10.1 Initial investigations have not highlighted any concerns or engineering difficulties with servicing the proposed development with new gas, water, electric or telecommunication. No engineering difficulties are anticipated for the required connection works.
- 7.10.2 New infrastructure and service connection costs are anticipated to be in line with those expected for a standard development of this scale.
- 7.10.3 A full Utilities report is provided in **Appendix 7**.

7.11 Interim Conclusion

- 7.11.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme. The site is not subject to, nor especially sensitive in terms of, any built or natural protection designations and the proposed housing development will not result in significant harm in terms of acknowledged amenity, community, heritage, landscape, traffic, environmental, technical or other acknowledged public interests.
- 7.11.2 Provided at **Appendix 14** is a Planning Balance Table which weighs the benefits of the development proposals against the negative factors.

8 CONCLUSIONS AND OVERALL PLANNING BALANCE

8.1 Housing Need

- 8.1.1 The outline planning application is made in the context of the government's requirement to boost housing land supply and responds specifically to the pressing need identified to deliver additional market and affordable housing. Whilst the positive determination of the application should not solely rely on a five year housing land supply shortfall, the proposal does respond positively to the identified lack of a five-year housing land supply in SCDC, as well as the identified backlog of housing requirements and ongoing need for housing in the District.

8.2 NPPF

- 8.2.1 Paragraph 14 of the Framework calls for decision takers to approve development which is consistent with the development plan without delay and to grant planning permission unless the harm of doing so would significantly and demonstrably outweigh the benefits. In this case, the application proposals comprise sustainable development in accordance with the definition set out in the Framework and when tested against all of the relevant sections.

8.3 Adopted Development Plan

- 8.3.1 It has been demonstrated that many of the saved policies of the Local Plan are out of date. Furthermore, the adopted Core Strategy does not plan positively for future development to meet the objectively assessed needs of the area. The policies relevant to the supply of housing are inconsistent with the Framework and therefore can only be accorded limited weight. The development proposals are in accordance with a number of environmental, design and technical development-management policies that can be considered up to date and are relevant to this application.
- 8.3.2 Further, it is evident that SCDC cannot demonstrate the minimum requisite five year housing land supply, and in this regard policies relating to the supply of housing are also out-of-date. The presumption in favour of sustainable development is therefore engaged.
- 8.3.3 It is important that SCDC allow sustainable developments, such as the application proposals, to come forward in order to remedy the Council's housing land supply position and meet the Objectively Assessed Needs of the Borough.

8.4 Sustainable Development and Key Benefits

- 8.4.1 Woodbridge is a successful settlement that is socially and economically sustainable when judged against the Framework within its spatial context. The proposals will help sustain the viability of the settlement and its key services. Further, the application site is situated within a demonstrably suitable and appropriate location to host new housing development.

- 8.4.2 The proposals will make a significant contribution towards meeting the social elements of sustainability through: providing homes to meet the objectively assessed housing needs of SCDC and making a valuable contribution towards five year housing land supply. Further the application proposals will provide 33% affordable housing (approximately 72 No.) in circumstances where there is a chronic shortage in the district, this should be regarded as a significant material benefit. The development proposals will assist in helping to maintain and enhance the vitality of Woodbridge.
- 8.4.3 In addition to the delivery of housing the proposals will also deliver an number of economic benefits which include New Homes Bonus totalling £405,400, 90 FTE jobs in construction, a further 20 indirect jobs in associated industries and total gross expenditure of £1.2million annually within Suffolk Coastal District.
- 8.4.4 There are also a number of environmental benefits associated with the development proposals which include the provision of green infrastructure and the protection and enhancement of existing wildlife corridors. Additional informal open space to be provided through the centre of the development is a significant benefit emanating from the scheme.

8.5 Impacts

- 8.5.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme. As with any greenfield site, the development will introduce changes to the area and some urbanising effects. Care has been taken to ensure that the impact and perceived impact is minimal and acceptable. This will be achieved through careful design and siting, and the holistic approach to landscape provision at the site.

8.6 Overall Conclusion

- 8.6.1 It can be concluded that there are no material considerations or adverse impacts which significantly and demonstrably outweigh the benefits which flow from the development.
- 8.6.2 This development, as proposed, clearly constitutes 'sustainable development', is viable and deliverable. There are significant material considerations that weigh heavily in its favour. In accordance with planning law and policy guidance the application should be approved without delay.

Appendix 1: Submitted Document List

SUBMITTED DOCUMENT LIST

A suite of documents have been submitted to support this application, which comprehensively demonstrate the suitability and sustainability of the site for development.

The Application Documentation comprises the following:

	Submission Document	Consultant
1	Application Covering Letter Application Form and Certificates	Gladman
2	Location Plan	FPCR
3	Development Framework Plan	FPCR
4	Design and Access Statement	FPCR
5	Planning Statement (including utilities statement)	Gladman
6	Transport Assessment	Hydrock
7	Travel Plan	Hydrock
8	Ecological Report	FPCR
9	Arboricultural Assessment	FPCR
10	Phase I Site Investigations	Hydrock
11	Flood Risk Assessment (FRA)	Hydrock
12	Foul Drainage Analysis	ULS
13	Air Quality Screening Report	Wardell Armstrong
14	Noise Impact Assessment	Wardell Armstrong
15	Archaeology Report	CgMs
16	Built Heritage Statement	CgMs
17	Statement of Community Involvement	Gladman
18	Affordable Housing Statement	Levell
19	Information for HRA	Ecology Solutions
20	Socio-Economic Report	Regeneris
21	Sequential Assessment	NLP

22	Sustainable Construction Statement	Gladman
23	Waste Management Strategy	Gladman
24	Play and Open Space strategy	FPCR
25	Environmental Statement	FPCR

Appendix 2: EIA Screening Direction



Department for Communities and Local Government

Ms H Ball
Planner
Gladman Developments Ltd
Gladman House
Alexandria Way
Congleton Business Park
Congleton
Cheshire
CW12 1LB

Please ask for: Karen Rose
Tel: 0303 44 48069
Email: Karen.rose@communities.gsi.gov.uk
Your ref: 2014-019
Our ref: NPCU/EIA/J3530/74188

Date: 28 August 2014

Dear Ms Bell,

Request for a Screening Direction

Town and Country Planning (Environmental Impact Assessment) Regulations 2011 - Proposal for residential development of up to 250 dwellings and the development of a Convenience Store (Use Class A1) of up to 400sqm (Gross) net retail area 280sqm (including car parking) on land off Duke's Park, Woodbridge.

I refer to your request dated 30 July, made pursuant to regulation 5(7) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (S.I. 2011/1824) ("the 2011 Regulations"), for the Secretary of State's screening direction on the matter of whether or not the development your clients propose is 'EIA development' within the meaning of the 2011 Regulations.

The development for residential development of up to 250 dwellings and the development of a convenience store (Use Class A1) of up to 400sqm (Gross) net retail area 280sqm (including car parking) on land off Duke's Park, Woodbridge, falls within the description at paragraph 10 (b) of Schedule 2 to the 2011 Regulations. Since the proposal exceeds the threshold in column 2 of the table in Schedule 2 to the 2011 Regulations, the Secretary of State considers your client's proposal to be 'Schedule 2 development' within the meaning of the 2011 Regulations.

Furthermore, in the opinion of the Secretary of State having taken into account the selection criteria in Schedule 3 to the 2011 Regulations, the proposal would be likely to have significant effects on the environment, because of its nature, size and location having regard to the following points:

It is noted that the site is located in close proximity to the nationally designated site of Deben Estuary which is a designated SSSI, Ramsar and SPA and as such is a sensitive area that is notified under section 28(1) of the wildlife and Countryside Act 1981. It is also noted that the site will be visible from an area of outstanding natural beauty designated as such by an order by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000, due to the proximity of the site Natural England were consulted. The Secretary of State agrees with Natural England and Suffolk Coastal District Council that the development proposed is over and above the core strategy allocations and therefore presents issues around the recreational impact on these designated sites, alone and in combination with other developments.

During the processing of the case the Environment Agency were also consulted to provide advice on the draft Flood Risk Assessment and Surface Water Drainage Strategy submitted with the request. The Environment Agency would wish to see an indicative layout /draft master plan before commenting on the draft FRA report and in the event of development proposal coming forward, the surface water management scheme should address any particular considerations that may arise from the underground cabling for the consented East Anglia One (and future related developments) offshore wind farm that would cross the site. The Environment Agency note that the development proposal is in addition to the projected development growth in the adopted Suffolk Coastal District Council Core Strategy and assessed in the Haven Gateway Water Cycle Study, and may give rise to capacity issues in the medium to long term.

Accordingly, in exercise of the powers conferred on him by regulation 6(4) of the 2011 Regulations the Secretary of State hereby directs that the proposed development described in your request and the documents submitted with it, is 'EIA development' within the meaning of the 2011 Regulations. This letter constitutes the statement required by regulation 4(7).

Any application for planning permission for this development must be accompanied by an Environmental Statement. Under regulation 2(1) of the 2011 Regulations, an Environmental Statement must contain, for the purpose of assessing the likely impact on the environment, the information specified in that regulation. I recommend that you refer to the Regulations before and during the preparation of the Environmental Statement.

You will bear in mind that the Secretary of State's opinion on the likelihood of the development having significant environmental effects is reached only for the purposes of this direction.

I am sending a copy of this letter to the Suffolk Coastal District Council

Yours sincerely



Karen Rose
Planning Casework Manager
(With the authority of the Secretary of State)

Appendix 3: EIA Scoping Opinion

Suffolk Coastal District Council

Melton Hill, Woodbridge, Suffolk IP12 1AU

Tel: (01394) 383789

Fax: (01394) 385100

Minicom: (01394) 444211

DX: Woodbridge 41400

Website: www.suffolkcoastal.gov.uk

24 NOV 2014



Mr Michael Samuels
FPRCR Environment and Design Ltd
Lockington Hall
Lockington
Derby
DE74 2RH

Please ask for: Liz Beighton
Direct Dial: (01394) 444778
E-mail
address: liz.beighton@eastssuffolk.gov.uk
Our Ref:
Your Ref:

20 November 2014

Dear Mr Samuels,

SCOPING OPINION FOR LAND OFF DUKES PARK, MARTLESHAM

I write in response to your request for a Scoping Opinion on the Environmental Impact Assessment (EIA), pursuant to Regulations 13 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011. It has been determined by the Secretary of State that an Environmental Statement is required to support any application on this site. I apologise for the delay in coming back to you on this matter. I am in receipt of a number of key consultation responses which has enabled the Local Authority to respond on this matter, and these have been attached to this response for your benefit.

As with all Scoping Opinions and in accordance with the regulations, a copy of this letter will be placed on the EIA Part 1 register, held in the Planning Reception area at our Melton Hill Offices.

The following organisations have been consulted on your proposals, and the comments from those who have responded, have been incorporated in to this following Scoping Opinion; Natural England, Suffolk Wildlife Trust, Environment Agency, Anglian Water, Scottish Power, Suffolk County Council (as Local Education Provider, Local Flooding Team, Highway Authority, S1906 Officer and Public Rights of Way Team), Suffolk Coastal District Council (as Environmental and Port Health, Landscape, Design and Open Space). Consultation has also been undertaken with Martlesham Parish Council, Woodbridge Town Council and the Ward Members for both the wards of Martlesham and Woodbridge.

Further, more detailed consultation will be undertaken with the above bodies and local affected residents upon the receipt of any planning application to be submitted. The comments received in respect of the Scoping Opinion do not prejudice any further comments to be made once the application is received.

Where relevant their comments have been incorporated into this Scoping Opinion, which is based upon the document you submitted and our records of features etc within the vicinity of the site.

Informal Opinion on Proposal

Although irrelevant to the assessment of the Scoping Report, I wish to take this opportunity to reiterate the informal opinion have previously been provided in connection with the development of this site.



INVESTOR IN PEOPLE

Suffolk Coastal...where quality of life counts

In my informal opinion, planning permission is unlikely to be granted for this proposal. It is contrary to Local and National Planning Policy, due to its location outside the defined physical limits in an area of the district where an area for significant residential development has already been designated under Policy SP20. Furthermore, there are significant concerns regarding the visual impact of the development and impact therein on sensitive landscape designations. A formal pre-application consultation response has been sent previously.

Social and Economic Effects

Demographics and general issues

The Environmental Impact Statement will need to go beyond the consideration of capacity of community facilities, to test the interrelationships between provision and wider environmental considerations, including health.

The demographic make up of the new development is likely to have secondary affects on education, health and local services. The County Council have indicated on a number of sites that they would be happy to share information relating to the number of children likely to live in the new development.

Data on the number and likely needs relating to housing needs at a district level is available by a tool provided by the Housing Learning and Improvement Network, known as 'Shop' (see <http://www.housinglin.org.uk/>). This will provide useful indicative information on the demographic make up of the development.

Whilst there is no single methodology for considering impacts on older people, the Government's 'Lifetime Neighbourhoods' report offers a useful guide to the spatial needs of older people.

Housing Mix

The demographics of the future occupants and their socio-economic requirements are likely to be influenced by the mix of housing proposed.

Any proposal would need to include a range of dwelling types, sizes and tenures in accordance with Policy SP3 of the Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document (July 2014), and the inclusion of bungalows and lifetime homes would be welcomed as part of the proposals.

In accordance with Policy DM2 of the Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document (July 2014), at least 1 in 3 dwellings would have to be affordable. The identified need is for 100% affordable rented dwellings.

The level and size of affordable dwellings will need to meet the policy requirements. However the overall mix, size and location of affordable and open market dwellings must be balanced to create a well balanced and sustainable community. Therefore it is likely that less than 60% of affordable units would be required to be 1 bedroomed, and a higher percentage of 2 and 3 bedroomed units would be required. This is also reflective of the lack of small units which currently exist in the Woodbridge Area and relates to both the open market and affordable.

There may be future housing needs surveys undertaken between now and when you are ready to submit any planning application. Therefore you may wish to contact Suffolk Coastal's Housing Team prior to submission (Julie Griffiths can be contacted via Julie.Griffiths@eastsuffolk.gov.uk).

Impacts upon the Health of residents

Health Impacts are commonly part of an Integrated Impact Assessment that combines an Environmental Impact Assessment (EIA) and a Health Impact Assessment (HIA). The National Planning Policy Guidance (NPPG) section "What aspects of the environment need to be considered?" (<http://planningguidance.planningportal.gov.uk/>) restates the list of aspects of the environment which might be significantly affected (human beings, flora, fauna, soil, water, air, climate, landscape and material assets, including architectural and archaeological heritage) including the interaction between them.

Whilst the health benefits from the natural environment fit within this interaction, there is also a clear interaction between transportation, activity (active travel) and human health that should be incorporated in the Environmental Impact Assessment. Health Impacts are also linked to community facilities such as schools, and the phasing of the provision of facilities/services in relation to the occupation of the residential development.

Impacts upon educational, health and other services.

Any additional population will place additional demands on local services, potentially leading to them being stretched beyond their intended capacity. The impacts upon such services should form part of the EIA.

For considering impacts on Suffolk County Council Services, including those for young people, please see the Section 106 Developers Guide to Infrastructure Contributions in Suffolk (http://www.suffolk.gov.uk/business/planning-and-design-advice/planning_-_obligations/ or <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/policy/spg/s106/>). This also includes the County Council's approach to mitigating the impacts of development on the services they provide. The inter- relationship between transport and the provision of services is a particularly important consideration.

The County Council will be able to supply the applicant with up to date baseline data in relation to County Council Services, such as existing capacity at school and early years facilities, and additional demand arising, close to the point in which it is anticipated that an application will be submitted. It is acknowledged that there are existing problems with secondary school provision in the catchment. The responses they provide have a shelf life of six months from the date of their issue so as to be reflective of the constant change in school capacity. It is known to the Local Planning Authority that there is a deficiency in secondary school places in the East of Ipswich, with the two local high schools, Farlingaye and Kesgrave having a significant shortage of capacity. It is understood informally that similar issues also occur at the Primary School age. It is recommended that early discussions are undertaken with the County Council regarding these matters.

Furthermore, the needs and capacity of local healthcare provision will need to be assessed as part of the proposals and potentially additional provision will need to be provided as part of the proposed development. A local GP has raised concern regarding a different site on the capacity issues of the existing GP facilities in Woodbridge.

The District Council is currently in the process of preparing the Community Infrastructure Levy (CIL) document and charging schedule. Depending upon the date of your submission and the progress on this document, the proposal may have to include contributions in accordance with that scheme. Further information on CIL and the progress of this document can be found online via <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/cil/> or by contacting the Planning Policy Team on 01394 444558 or development.policy@suffolkcoastal.gov.uk . It is programmed that the CIL will be in place by April 2015.

Outdoor Sports and Play Space

The provision of outdoor playing and sports provision should be considered within the EIA, in terms of the social-economic impacts.

Any proposal for residential development will need to comply with Policies SP16 and DM32 of the Suffolk Coastal District Local Plan Core Strategy and Development Management Development Plan Document (July 2013) and Supplementary Planning Guidance 15 (outdoor Playing Space). The provision required can be found via <http://www.suffolkcoastal.gov.uk/yourdistrict/planning/policy/spg/playspace/>.

Due to the size of the proposal, it is expected to include on site provision of Outdoor Playing and Sports Space, rather than financial contributions for off-site provision. These areas should be in addition to any areas of green space which have been identified as necessary for mitigation upon any wildlife sites. Open Space should be planned appropriately into the site, useable, have appropriate surveillance and meet the needs of residents. Details of management of open space will be covered in the Section 106.

Energy and Water Supply

A few years ago, in connection with the Adastral Park scheme, there were concerns raised regarding the capacity of the local electricity power supply within the Eastern Ipswich Plan Area. Therefore discussions should be undertaken with the energy and water providers at an early stage to establish if there is adequate provision and/or if additional provision or upgrades to the network need to be provided by the developers as part of the scheme. The Environment Agency consider that the information contained within the Scoping Report is sufficient for their purposes. The capacity of these services and efficiency measures should be assessed within the EIA.

Traffic and Transport

Transport

This proposal will have significant impacts upon the Local Road Network, both during construction and the operational use of the site, individually and cumulatively with other developments. As noted in the National Planning Policy Practice Guidance, there is a need for the EIA process to fulfil the role of assessing cumulative and indirect environmental impacts and the relationship between them in respect of traffic and transport.

To this end, you should be aware that Hopkins Homes are in the process of preparing a planning application for the development of in the region of 100 dwellings on land which is currently occupied by Woodbridge Town Football Club, which you will be aware is in close vicinity to your application site. As this work is very advanced and an application is due early 2015, your transport assessment should take into account this proposal in terms of the cumulative impact of development.

The developer needs to collect baseline data/information on the local highway network, and provide a Transport Assessment. This assessment will need to be undertaken in accordance with the Department for Transport's 2007 'Guidance on Transport Assessment' (<https://www.gov.uk/government/publications/guidance-on-transport-assessment>).

Impacts of the proposal upon transport should be considered as part of the Transport Assessment, but whilst government guidance on Transport Assessment does suggest that reference is made to health objectives, it is important that inter-relationships with health and wellbeing outcomes are clear and considered.

The Transport Assessment should be accompanied by a Travel Plan that considers all modes of transport and a plan for the management of construction traffic. Consideration of cumulative impacts with other developments, including those listed in paragraph 3.13 of the Scoping Report must be included.

If the Transport Assessment identifies the need for any highway improvements, these will need to be included as part of the application, and will need to be funded by the developer.

The Transport Assessment should include public transport. Details on public transport routes and timetables can be found online via <http://www.suffolkonboard.com/>.

Baseline noise level information should be obtained either by monitoring or calculation. The latter will require traffic flow information including the proportion of heavy goods vehicles for pre-scheme and predicted post scheme scenarios will all proposed developments in the area in place.

All road traffic noise monitoring and calculation should be in accordance with the Department of Transport's "Calculation of Road Traffic Noise" methodology. An assessment of cumulative road traffic noise impacts should be carried out using the criteria contained in the "Design manual for Roads Bridges", Volume 11, Section 3, Part 7 "Noise and Vibration". It would be useful to include the traffic flows on which the assessment is based.

An assessment of the impacts upon air quality of increased traffic during construction and once the development is completed, will also need to be submitted. Further details can be found in the Air Quality Section on pages 12 -13 and the Construction Management Section on page 14.

Rights of Way

It is not believed that there are any existing Public Rights of Way transgressing the site at present, but the site, and possible development, will be clearly visible from a number of Public Rights of Way and vantage points, and this visual aspect will need to be clearly considered in your supporting information. Furthermore, it would be of benefit in terms of the sustainability credentials of the site to provide for pedestrian linkages through the site to aid with the movement of people.

Historical and Cultural Impacts

The consultation response from the County Council Archaeological Service is attached to this letter and you will note that they have advised that the proposal affects a large area with high archaeological interest. It is therefore recommended that certain evidence is provided in your EIA (see page 2 of the letter from Suffolk County Council). The Conservation Team at Suffolk County Council have offered their services to discuss this further prior to submission.

Habitats, Wildlife and Landscape

The EIA should accord incorporate all of the recommendations of the attached letter from Natural England.

Specific attention should be given to the potential main impacts from additional recreational disturbance on the nearby Sites of Special Scientific Interest (Deben Estuary) and Special Protection Areas (the estuary and coastal). The EIA should include full reference to any impacts on the features of the Deben Estuary SSSI as well as the features of the SPA. Natural England will be formally consulted on any application once submitted and will provide details on this matter as part of their formal response.

As established through the assessments connected with the Core Strategy, this proposal will also need an Appropriate Assessment and a Strategic Environmental Assessment to assess the impacts upon the SPA's and other designated sites. Consultation should be undertaken with Natural England to establish the scope and requirements of both of these documents in relation to your proposals.

Information on the location and extent of these designations can be found from a variety of publically available sources (including www.natureonthemap.naturalengland.org.uk), which should have been consulted prior to the submission of the Scoping Report. The existence of these designations was highlighted in both the Council's and the Secretary of States Scoping Opinions.

There is a the need for sufficient data to enable the preparation of a project draft Habitats Regulations Assessment (HRA) as required by the Core Strategy HRA, which was approved along side the Core Strategy in Summer 2013 (<http://www.suffolkcoastal.gov.uk/yourdistrict/planning/review/corestrategy/documents/>) .

Information/data will be particularly required for the combination of effects, which will identify the appropriate level of natural greenspace required for mitigation, both within the site and offsite.

Information on various biodiversity matters is available from a variety of sources including the Suffolk Biodiversity Records (<http://www.suffolkbrc.org.uk/>). These sources should be consulted to provide a desktop search for local, national and internationally designated sites, priority (BAP) species and protected species.

The potential impact upon priority (BAP) species, such as reptiles, breeding birds, and stag beetles as well as priority habitats such as broadleaved woodland and hedgerows should be addressed (both on and off the site). This development will particularly affect farmland specialists such as skylarks and hares, so it is important to demonstrate how any losses can be off set; for example securing agri-environment measures on nearby arable land. The desktop assessment should be prepared in consultation with the Suffolk Biodiversity Records Centre, as there are local records, including additional bat species, which should inform survey requirements.

Protected Species

It is recommended that surveys for reptiles are undertake to inform the assessment of this development in terms of the impacts upon biodiversity. Surveys must also include checks for bat roots in trees on and around the site to deal with all potential bat issues. The use of LED lighting, particularly for street lighting within the development, is encouraged due to the potential for bats.

The scope for further surveys will need to be agreed with the Local Planning Authority, once the desktop study (in the section above) has been completed. The County Council have recommended that nationally agreed guidelines are followed for all surveys, and all survey work is undertaken in the appropriate season by appropriately qualified ecological consultants.

General comments on habitat and wildlife impacts

The assessment of likely ecological impacts needs to include sufficient mitigation measures to minimise impacts as well as identify compensation or offsetting requirements. Biodiversity validation requirements should also be met to ensure that the Local Planning Authority has sufficient and up to date information to enable the lawful determination of the application.

There are obvious opportunities for ecological enhancement of habitats and species associated with this type of development. The EIA should explore options for habitat creation and

enhancement and connections both for wildlife and people to complement the local habitats and species, and be sustainable within the context of the proposed project. Considerations should also be given to the likelihood of species colonising new habitats and any measures needed to ensure their protection.

Landscape

There would potentially be detrimental impacts upon the character of the landscape, the intrusion of the built environment into the wider countryside and detrimental impacts upon local visual amenity for users of the Public Rights of Way.

The Suffolk Landscape Character Assessment 2008 (updated 2011) and is available to be viewed online via <http://www.suffolklandscape.org.uk/default.aspx>.

A Landscape and Visual Impact Assessment (LVIA) should be carried out in accordance with the Landscape Institute's Guidance on Landscape and Visual Impact Assessment 3. Any photomontages should be prepared in accordance with Landscape Institute Note 11/01. All viewpoints and any-photo-montage locations should be agreed with the Local Planning Authority before this work is undertaken.

It is essential that the cumulative landscape and visual effects with the proposal, and any proposed or consented developments are also considered within the LVIA. As referred to previously, the LVIA should take account of the cumulative impact on other development proposals being progressed in the close vicinity, namely that at Woodbridge Town Football Club being progressed by Hopkins Homes. It is important that the LVIA assesses the potential visual impact from the Deben Estuary SPA and to that end suggest that Martlesham Creek form one of the key viewpoints of the site. The Local Authority's Landscape Manager would be happy to agree other viewpoints with you in advance of submission.

The LVIA should text the proposed mitigation strategy and clearly assess its effectiveness identifying residual impacts, in both visual and landscape terms. The proposal should be designed to seek to incorporate locally appropriate features such as tree belts and bring forward proposals to maintain existing belt planting.

Greenspace and Openspace

As explained in the Section relating to Designated Sites in the Locality, there is likely to be a requirement for the provision of natural green space both on and off site, to help mitigate against the impact of additional recreational disturbance in the nearby designated areas. This should be a consideration from the outside, which shapes the proposal in terms of form, scale, density, number of dwellings, layout etc.

Natural Open space is different from land used for Outdoor Play and Sports Provision. Therefore land will need to be allocated separately for these.

Other Matters

Sustainable Construction

The proposal would result in the loss of a greenfield site and therefore the developer should aim to minimise the use of resources and the production of waste and in doing so ensure the development incorporates principles of sustainable construction and design.

Policy DM24 (Sustainable Construction) of the Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document, states that as of 2013,

residential developments should meet Code Level 4 of the Code for Sustainable Homes, and as of 2016, they should meet Code Level 5.

This policy also requires proposals to demonstrate an active consideration of the Suffolk Coastal Renewable and Low Carbon Technical Study and in particular the Energy Opportunities Plan.

As explained in the attached letter from the Environment Agency, an overall sustainability pre-assessment statement under the appropriate Code/BREEAM standard should be submitted with the application. It is recommended that the measures relating to reducing waste and improving efficiency that area set out in the Environment Agency letter, are incorporated into the design of any proposal.

Flooding/Surface Water

Any Planning Application for a site greater than 1hectare has to be accompanied by an appropriate site specific Flood Risk Assessment (FRA). The FRA will need to assess the flood risks to the development site, and to demonstrate how the proposals and any future occupants will be kept safe from flooding, now, and over the lifetime of the development and not increase flood risk elsewhere as a result of any additional impermeable surfaces. Within the FRA, allowances for Climate Change should be considered within the design of the surface water drainage system. The allowances should be applied as detailed under Planning Practice Guidance 2, for the lifetime of the proposed development, including any allowances for climate change.

The FRA will need to comply with the requirements of the National Planning Policy Framework and associated Planning Practice Guidance, as explained in further detail in the attached letter from the Environment Agency.

This proposal will have an effect on the surface water hydrology, both within the site and the surround area, including the adjacent built area. This site should discharge no more than the greenfield rate of run-off by utilising the existing geology and topographical properties to ensure a balanced water management system is effective and sustainable.

The development of this site should look to incorporate sustainable drainage systems (SUDS) to manage surface water in accordance with paragraph 103 of the NPPF. The proposal will need to be accessed for using a drainage system that is designed in accordance with the CIRIA Guide C697. There may be scope to incorporate grey water recycling.

The County Council will be able to provide information on existing surface water flood mapping in the surrounding area. Having assessed the information you submitted, the County Council's SUBD team has no comments to make, but is keen to review the FRA when submitted.

Foul water disposal

Local upgrades to the sewer network may be required and pumping stations etc. Such upgrades should be discussed with Anglian Water and would need to be put in place before any dwelling could be occupied. Details of foul water disposal, capacity and necessary upgrades will need to be submitted with the application.

Noise and vibration

Any application should be accompanied by a Noise Survey and assessments of the noise from adjacent railway line and traffic on the A12. Whilst a full acoustic assessment may not be necessary justification should be given if this is not to be the case.

Air Quality

A Local Air Quality Management Assessment will need to be undertaken To this end, I refer you to the comments provided by the Head of Environmental Services and Port Health which gives commentary on the information you will be required to assess. Denise Lavender of our Environmental Protection Team, has stated she is happy to discuss the above requirements with the applicants or their consultants. She can be contacted via denise.lavender@suffolkcoastal.gov.uk or 01394 444350.

Land Contamination

Any proposal for residential development on this site will need to be accompanied by a Phase 1 Land Contamination Assessment, which shall include a report of a site walkover survey, a desk top study of historic land use information in and around the site, and an initial risk assessment.

The outcome of the Phase 1 Assessment may require that a Phase 2 intrusive investigation and report needs to be undertaken and submitted. The assessment(s) should be submitted upfront with any future application.

Geology and Minerals

Although not an EIA matter, the County Council, as the Local Minerals Authority have requested that you are reminded of the requirements of Policy MP5 of the Suffolk Minerals Core Strategy, because this site is within a Minerals Consultation Area. Available online via <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/minerals-and-waste-development-framework/minerals-core-strategy-dpd/> . I draw your attention to the comments they raise in page 3 of their appended letter.

Waste

Waste will be generated during construction and occupation of the site. National statistics of construction and municipal waste(s) by volume are available. Assessment of the scheme will be undertaken in line with the DMRB Interim Guidance Note 153/11 – Guidance on the Environmental Assessment of Mineral Resources.

A Waste Strategy Report should be provided in the Environmental Statement, including a review of options to how the waste management hierarchy could be delivered on-site and waste minimisation achieved through on site reuse/reduction.

Waste will also be generated by the development once operational/occupied. The proposal should be designed to incorporate refuse/recycling storage and presentation areas for all residential properties. It is recommended early discussion is undertaken with the Suffolk Coastal Waste Services Team regarding the requirements for accessibility by their refuse/recycling vehicles (tel: 01394 444000 or email scs@ncsgrp.co.uk).

Construction Phase

There is significant potential for construction noise and vibration to affect the existing residential properties. A Construction Management and Phasing Plan (or similar titled) document will also be required setting out how the particular affects of noise, vibration and dust shall be controlled during the construction phases, with the view to protecting the existing residents in the area.

East Anglian Off-shore Wind

I refer you to previous discussion and the letter from Suffolk County Council on page 8. You will need to address the relationship between the proposed development and the cable route across the site connected with the EAOW1 project. The plans and commentary will need to clearly show the route and assess the inter-relationship between both proposed land uses.

Submission Documents

The above comments are given without prejudice to the determination of any formal planning application. Any planning application for the proposed development on this site should include the following as a minimum:

- **Normal drawings/plans** e.g. Site location plan, Layout Plan, Elevations, Streetscenes, Topographical survey and a plan showing proposed ground level changes (to aid in understanding ground level changes both by the Local Planning Authority and as part of the Landscape Assessment)
- **Planning Application Fee**
- **Environmental Impact Assessment** covering all the issues and meeting all the requirements set out above.
- **An Appropriate Assessment** – relating to the impacts upon designated sites. You will need to discuss the requirements for this document with Natural England.
- **A Strategic Environmental Assessment** – relating to the impacts upon designated sites. You will need to discuss the requirements for this document with Natural England.
- **A Planning Statement.**
- **A Design and Access Statement** (required for all Major Applications)
- **A Public Consultation Statement** setting out the public consultation process and how the comments received have been considered and shaped the proposals submitted.
- **A statement explaining the housing mix**, expected demographics of the proposed development, the expected impacts upon services and how the S106/CIL requirements are proposed to be met.
- **A statement and plan(s) explaining the different areas of play, sports and other open areas** to be provided on site as part of meeting the policy requirements and any mitigation measures identified through the EIA.
- **Details of Sustainable Construction** including information on the supply of water and energy (may need to be a summary in the EIA with separate documentation). This should include an Energy Statement assessing the proposal against the Code for Sustainable Homes (as required under Policy DM24 and paragraphs 93-98 of the NPPF)
- **A Traffic Assessment** of the cumulative affects of the proposal and other permitted developments within the Eastern Ipswich Plan Area and details of any works required as a result of its findings (this is also likely to feed into the EIA).
- **A Heritage Statement** assessing the impacts upon heritage assts in accordance with the recommendations in the English Heritage Letter,
- **The Archaeological Desk Top Study**

- **The results and methodology of Archaeological investigation works** (works to be agreed with SCC Archaeology).
- **Ecological Assessments, Surveys of Protected Species and the assessments/surveys of the County Wildlife site**, which includes the western part of the land included in the red line (undertaken at the appropriate time of year/season for the species). These should inform the EIA.
- **A Landscape and Visual Impact Assessment**. This should inform the EIA.
- **Arboricultural Assessment** of any trees affected by the proposals.
- **Land Contamination Investigation Reports** and associated details of any mitigation/works required.
- **A Minerals Statement** - An explanation as to how the minerals on site have been considered and how/why they will be used/not used (see letter from Suffolk County Council)
- **A Flood Risk Assessment** (required due to size of site)
- **Details of a SUDs drainage system** (linked to the FRA)
- **Details of foul drainage** and any upgrades requires/to be undertaken to the existing foul water drainage system.
- **Details of any Electricity supply works** including any new substations etc.
- **An Overall Sustainability Pre-Assessment** - under the Code for Sustainable Homes/BREEAM standard.
- **Air Quality Assessments** of increased traffic during construction and once the development is completed, and the impacts this would have upon residents and the designated sites (will form part of EIA, but additional documentation is also likely to be required).
- **Noise Surveys and Assessments of:**
 - o The impact of noise and disturbance from Foxhall Stadium upon any future residents of the proposed development.
 - o The impact of traffic noise upon existing and future residents.

and

 - o Assessments of Noise, vibration and dust during construction.

And

- **Construction Management Plan**

Many of the above documents will need to be completed prior to the EIA statement, because they will need to inform and effect its assessment of the various issues. I also re-affirm previous comments in that the EIA should take note of the cumulative impact of not just this development but other developments in the vicinity which are being progressed and are at an advanced stage in their formulation.

Please note the above list is not extensive, and additional documentation may be required as a result of the findings of the various assessments and surveys.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Liz Beighton', with a stylized, cursive script.

Liz Beighton BA (Hons) MTP MRTI
Development Management Team Leader

Liz Beighton

From: Adine Schrankel
Sent: 03 November 2014 09:54
To: Liz Beighton
Subject: FW: Environmental Statement -Request for Scoping Opinion Land off Dukes Park Woodbridge

From: Sue Bull [<mailto:sbull@anglianwater.co.uk>]
Sent: 30 October 2014 15:31
To: Adine Schrankel
Subject: Environmental Statement -Request for Scoping Opinion Land off Dukes Park Woodbridge

Environmental Statement -Request for Scoping Opinion Land off Dukes Park Woodbridge

Thank you for the opportunity to comment on this document.

HYDROLOGY, WATERCOURSES AND FLOOD RISK

It is noted in the report (3.22) that '*A response from the Environment Agency has been received and will provide guidance on foul water disposal.*' It is recommended that the applicant seeks advice from the sewerage undertaker, Anglian Water on this key issue.

Anglian Water offers a pre planning service which includes a capacity check to determine the impact of a proposed development. We would also work with the applicant during this process to develop a drainage solution which will not cause a detriment to our existing or future customers or the environment. Details of this service can be found at <http://www.anglianwater.co.uk/developers/pre-planning-service-.aspx>.

I have no further comments to make,

regards

Sue Bull
Planning Liaison Manager
Planning & Equivalence
Asset Management

Thorpewood House
Peterborough

PE3 6WT

Tel: 01733 414690
Mob: 07885 135312

Click [here](#) to report this email as spam.

Liz Beighton

From: D.C.Admin
Sent: 30 October 2014 15:50
To: Adine Schrankel; Liz Beighton
Subject: FW: Plan to accompany - ES Request for Scoping Opinion - Land off Duke's Park, Woodbridge -

FYI

Amanda Carter

Service Support Officer
Development Control
Suffolk Coastal and Waveney District Councils
Tel: 01394 444430

Email: amanda.carter@eastsuffolk.gov.uk

Suffolk Coastal and Waveney District Councils are working as a partnership and all emails received from us will use the @eastsuffolk.gov.uk email address

www.suffolkcoastal.gov.uk | www.twitter.com/suffolkcoastal
www.waveney.gov.uk | www.twitter.com/waveneydc

From: James Meyer [<mailto:JamesM@suffolkwildlifetrust.org>]
Sent: 29 October 2014 17:56
To: D.C.Admin
Subject: RE: Plan to accompany - ES Request for Scoping Opinion - Land off Duke's Park, Woodbridge -

Dear Mrs Beighton,

Thank you for consulting us on the above EIA Scoping request. We have read the sections of the Scoping Report (FPCR, 2014) relating to ecology and can confirm that we are broadly satisfied with the extent of the assessment proposed. In addition to the assessments detailed we would recommend that consideration is given to the potential impact of recreational disturbance on nearby statutory designated sites (such as the Deben Estuary Site of Special Scientific Interest (SSSI)).

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

Kind regards

James Meyer
Conservation Planner

From: Adine Schrankel [<mailto:Adine.Schrankel@eastsuffolk.gov.uk>]
Sent: 09 October 2014 12:45
To: Info Suffolkwildlifetrust
Subject: FW: Plan to accompany - ES Request for Scoping Opinion - Land off Duke's Park, Woodbridge -
Importance: High

Please find attached the plan to accompany the Scoping Opinion for Land off Duke's Park, Woodbridge which was emailed to you on 7th October 2014. Scoping document attached again for your information

From: Adine Schrankel

Sent: 07 October 2014 15:38

To: 'info@suffolkwildlifetrust.org.uk'; 'consultations@naturalengland.org.uk'; 'planningliaison@anglianwater.co.uk'; 'PROWplanning@suffolk.gov.uk'; 'floods@suffolk.gov.uk'; 'consents.epn@ukpowernetworks.co.uk'; 'Plantprotection@uk.ngrid.com'; 'Nick.Collinson@suffolk.gov.uk'; 'robin.whittle@btinternet.com'; 'chris@woodbridge-suffolk.gov.uk'; 'clerk@martleshamcouncil.org.uk'; Jennifer Lockington; Nicholas Newton; Robert Scrimgeour; Peter Ross; Geoff Holdcroft; Edward Binns; Diana Ball; Josh Sayles; Chris Blundell; John Kelso; 'enquiries@environment-agency.gov.uk'; 'Neil McManus'; 'iain.maxwell@suffolk.gov.uk'; 'stephen.courdry@suufolk.gov.uk.'

Cc: Liz Beighton; Terri Caylor; Amanda Carter; George Bolan; Liz Riley; Thomas Oxborough; Kay Willisson

Subject: 6106 - Land off Duke's Park, Woodbridge - ES Request for Scoping Opinion

Importance: High

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 1999

SCOPING OPINION - LAND OFF DUKES PARK, MARTLESHAM

I write to notify you that Gladman Developments Ltd has formally approached Suffolk Coastal District Council to record their development intentions on land off Dukes Park, Martlesham (referred in their documentation as being Woodbridge). In summary, their proposal is to create up to 215 new homes together with children's play space and Green Infrastructure connectivity.

In accordance with the above Regulations it has been determined that any subsequent planning application(s) will need to be accompanied by an Environmental Impact Assessment (EIA) so as to enable the Local Planning Authority to gauge the environmental impact of the proposals. I have now received a scoping request seeking the Local Planning Authority's formal opinion on the information that has to be supplied in the Environmental Statement.

To that end, I hereby attach a copy of the draft documentation prepared by Gladman Development Ltd, and would welcome your comments on such, insofar as it relates to matters upon which you are able to comment, within 21 days from the date of this notification. If I have not heard from you then I shall assume that you have no comments to make and that you are satisfied with the scope of the Environmental Statement (ES).

I trust this is to your satisfaction but please do not hesitate to contact Liz Beighton (01394 444778) if you have any queries or would like to discuss this further.

Liz Beighton

From: Jason Skilton <Jason.Skilton@suffolk.gov.uk>
Sent: 21 October 2014 09:15
To: Liz Beighton
Subject: RE: 6106 - Land off Duke's Park, Woodbridge - ES Request for Scoping Opinion

Hi Liz,

No comments as yet, will be interesting to see what the FRA says.

J

From: floods
Sent: 08 October 2014 08:05
To: Jason Skilton
Subject: FW: 6106 - Land off Duke's Park, Woodbridge - ES Request for Scoping Opinion
Importance: High

Jason

One for you.

Jeff

From: Adine Schrankel [<mailto:Adine.Schrankel@eastssuffolk.gov.uk>]
Sent: 07 October 2014 15:38
To: 'info@suffolkwildlifetrust.orggov.uk'; 'consultations@naturalengland.org.uk'; 'planningliaison@anglianwater.co.uk'; PROW Planning; floods; 'consents.epn@ukpowernetworks.co.uk'; 'Plantprotection@uk.ngrid.com'; Nick Collinson; 'robin.whittle@btinternet.com'; 'chris@woodbridge-suffolk.gov.uk'; Martlesham Parish Council; Jennifer Lockington; Nicholas Newton; Robert Scrimgeour; Peter Ross; Geoff Holdcroft; Edward Binns; Diana Ball; Josh Sayles; Chris Blundell; John Kelso; 'enquiries@environment-agency.gov.uk'; Neil McManus; Iain Maxwell; 'stephen.courdry@suufolk.gov.uk.'
Cc: Liz Beighton; Terri Caylor; Amanda Carter; George Bolan; Liz Riley; Thomas Oxborough; Kay Willisson
Subject: 6106 - Land off Duke's Park, Woodbridge - ES Request for Scoping Opinion
Importance: High

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 1999

SCOPING OPINION - LAND OFF DUKES PARK, MARTLESHAM

I write to notify you that Gladman Developments Ltd has formally approached Suffolk Coastal District Council to record their development intentions on land off Dukes Park, Martlesham (referred in their documentation as being Woodbridge). In summary, their proposal is to create up to 215 new homes together with children's play space and Green Infrastructure connectivity.

In accordance with the above Regulations it has been determined that any subsequent planning application(s) will need to be accompanied by an Environmental Impact Assessment (EIA) so as to enable the Local Planning Authority to gauge the environmental impact of the proposals. I have now received a scoping request seeking the Local Planning Authority's formal opinion on the information that has to be supplied in the Environmental Statement.

To that end, I hereby attach a copy of the draft documentation prepared by Gladman Development Ltd, and would welcome your comments on such, insofar as it relates to matters upon which you are able to comment, within 21 days from the date of this notification. If I have not heard from you then I shall assume that you have no comments to make and that you are satisfied with the scope of the Environmental Statement (ES).

I trust this is to your satisfaction but please do not hesitate to contact Liz Beighton (01394 444778) if you have any queries or would like to discuss this further.

Any requests made under the Freedom of Information Act or the Environmental Information Regulations should be redirected to foi@eastsuffolk.gov.uk clearly stating whether the request applies to Suffolk Coastal District Council, Waveney District Council or both authorities.

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Ms Liz Beighton
Suffolk Coastal District Council
Council Offices Melton Hill
Woodbridge
Suffolk
IP12 1AU

Our ref: AE/2014/118310/01-L01
Your ref: 141009/NE20
Date: 13 October 2014

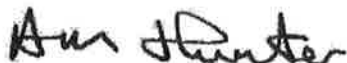
Dear Ms Beighton

**SCOPING OPINION REQUEST UNDER THE TOWN AND COUNTRY PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 FOR
RESIDENTIAL DEVELOPMENT OF UP TO 215 DWELLINGS TOGETHER WITH
CHILDREN'S PLAY SPACE, INCLUDING EQUIPPED PLAY, AMENITY GREEN
SPACE AND GREEN INFRASTRUCTURE CONNECTIVITY: LAND OFF DUKE'S
ROAD, WOODBRIDGE**

Thank you for inviting us to comment on the above scoping opinion consultation.

We have reviewed the scoping opinion report dated September 2014 prepared by FPCR Environment and Design Ltd. We consider that this adequately covers all the main areas that need to be studied, for environmental impact assessment purposes, from our perspective and we have no comments to make.

Yours sincerely



Andrew Hunter
Sustainable Places - Planning Advisor

Direct dial 01473 706749
Direct fax 01473 271320
Direct e-mail andrew.hunter@environment-agency.gov.uk

MEMORANDUM

From Head of Environmental Services and Port Health – Environmental Protection To Head of Planning Services

Our ref: 14/06012/PREPLN

Your Ref

Date: 15th October 2014

SCOPING OPINION - LAND BETWEEN DUKES PARK AND TOP STREET, IPSWICH ROAD, MARTLESHAM DEVELOPMENT OF UP TO 215 DWELLINGS

Head of Environmental Services and Port Health – Environmental Protection Comments

Thank you for your consultation concerning the above.

I understand that a scoping request has been received by developers to determine the information required in an Environmental Statement to accompany the above application. I have the following comments to make about matters which may be included in the Environmental Statement, or assessed through separate reports, if a planning application is made -

Noise – Noise from the railway line and road traffic on the A12 should be considered. It is possible that a full acoustic assessment of road traffic noise is not necessary, but justification should be given if this is considered to be the case.

Construction Management Plan – Noise and dust from the construction process should be taken into account in a Construction Management Plan. This should particularly focus around the parts of the development that border onto existing residential dwellings.

Contaminated Land – A planning application should be accompanied by at least a Phase 1 report.

Air Quality – A Local Air Quality Management assessment should be undertaken to determine whether there is any likelihood that the Air Quality Objectives for particulate matter (PM₁₀) and nitrogen dioxide (NO₂) will be exceeded either during the construction or operational phase of the development. This should be undertaken in line with the Department for Environment, Food and Rural affairs (Defra) Technical Guidance LAQM.TG(09). This assessment should include –

- The air quality impact of any biomass boilers that are proposed on the site
- The air quality impact of operational traffic on the local road network
- The air quality impact of operational traffic on the declared Air Quality Management Area (AQMA) in Woodbridge. In 2006, Suffolk Coastal District Council declared an AQMA at the junction of Lime Kiln Quay Road, Thoroughfare, St John's Street and Melton Hill within the town of Woodbridge for annual mean NO₂ concentrations. An Action Plan was produced in 2010 to try and help reduce NO₂ concentrations at this junction. Large developments in the locality have the potential to contribute to the NO₂

concentration within the AQMA due to traffic coming in to use the Woodbridge Town Centre facilities.

The Council has recently had detailed modelling undertaken for the AQMA which has determined that the junction is very unusual and that modelling predictions do not correspond with the monitoring being undertaken. The Consultants employed on behalf of the Council were asked to give advice with regard to any future planning applications which would put additional traffic through the AQMA and how best to assess their potential impacts. Their recommendation was to obtain an assessment of the increase of emissions/roadside concentrations that might be expected from the development both within and close to the AQMA. I would therefore need to see the **change** in emissions in terms of the road component due to the development.

I recommend that the specific receptor locations to be modelled and the air quality assessment in general are agreed with this team prior to the assessment being conducted.

- The effect of construction dust on receptor locations.

MEMORANDUM

From Head of Environmental Services and Port Health – Environmental Protection To Head of Planning Services

Our ref: 14/06012/PREPLN

Your Ref

Date: 15th October 2014

SCOPING OPINION - LAND BETWEEN DUKES PARK AND TOP STREET, IPSWICH ROAD, MARTLESHAM DEVELOPMENT OF UP TO 215 DWELLINGS

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I recommend that the specific receptor locations to be modelled and the air quality assessment in general are agreed with this team prior to the assessment being conducted.

- The effect of construction dust on receptor locations.

Date: 27 October 2014
Our ref: 134054
Your ref: 6106



Liz Beighton
Suffolk Coastal District Council

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

BY EMAIL ONLY

T 0300 060 3900

Dear Liz,

Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): SCOPING OPINION (up to 215 new homes together with children's play space and Green Infrastructure connectivity) on Land Off Dukes Park, Woodbridge, Martlesham

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation.

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.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

We note under section 3.22 of the scoping request, that the Deben Estuary Site of Special Scientific Interest has not been included (although the SPA is), and it is our advice that the EIA should include full reference to any impacts on the features of the Deben Estuary SSSI, as well as the features of the SPA.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

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 only 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 consultations@naturalengland.org.uk.

Yours sincerely

John Jackson

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainableenvironmental/environmentalimpactassessment/noteenvironmental/>



Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites.

European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is adjacent to the following designated nature conservation sites:

- Deben Estuary Special Protection Area and Ramsar Site (SPA/R)
- Deben Estuary Site of Special Scientific Interest (SSSI)
- Further information on the SSSI and its special interest features can be found at www.natureonthemap.naturalengland.org.uk. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- Natura 2000 network site conservation objectives are available on our internet site [here](#).

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly

surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes

As the development site is within/adjacent to Suffolk Coast and Heaths Area of Outstanding Beauty, consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for SCH AONB

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm and further information can be found on Natural England's landscape pages [here](#).

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 109), which should be demonstrated through the ES.

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the

development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Your Ref:
Date: 27th October 2014
Enquiries to: Irina Davis
Tel: 01473 264208
Email: irina.davis@suffolk.gov.uk



Ms Liz Beighton
Suffolk Coastal District Council
Melton Hill
Woodbridge
Suffolk
IP12 1AU

Dear Ms Beighton,

Re: Consultation on Scoping Opinion under Environmental Impact Assessment Regulations 2011

Proposed residential development at Land off Duke's Park Woodbridge

The site is located on the southern edge of Woodbridge defined to the north by Top Street and Ipswich Road and is comprised of 12.89 ha of agricultural/pastoral land. The Project will constitute high quality residential development complete with the associated open space requirements to meet the community's needs as part of a cohesive green infrastructure (GI) framework. It is anticipated that the development will deliver up to 215 new homes together with children's play space, including equipped play, amenity green space and GI connectivity.

Thank you for consulting Suffolk County Council on the scope of the Environmental Impact Assessment of this proposal. The County Council is responding on potential significant environmental impacts that relate to its service responsibilities, and has the following comments to make in relation to the applicant's scoping report. In each case, the County Council would be pleased to supply additional baseline data where possible and appropriate, in line with statutory requirements. It would also expect to see proposals for mitigation measures, in line with regulations.

Air Quality

Potential Impact: With respect to local air quality, it is expected to be a nil return, there is unlikely to be any impact on the proposed site and Suffolk County Council does not expect its proposed use to contribute to a significant deterioration in local air quality.

Climate Change

Whilst it is perhaps not appropriate to characterise carbon emissions as a significant impact arising from this development individually, an account should be made of how the need to minimise carbons emissions influenced the choice of options.

Public health

Health impacts are commonly part of Integrated Impact Assessments that combine an Environmental Impact Assessment (EIA) and a Health Impact Assessment (HIA). DCLG's guidance¹ restates the list of aspects of the environment which might be significantly affected (human beings, flora, fauna, soil, water, air, climate, landscape, and material assets, including architectural and archaeological heritage) including the interaction between them. Whilst the health benefits from the natural environment² fit within this interaction, there is also a clear interaction between transportation, activity (active travel) and human health that should be reviewed in the ES. Health impacts are also linked to community facilities such as schools. Research on Cambourne, found that early residents had higher than average mental health problems, which were attributed to a lack of facilities in the new community.³

Archaeology

Potential Impact: This proposal affects a large area (c. 13ha) with high archaeological interest and potential. Development of the site will cause significant ground disturbance that has potential to damage or destroy any archaeological deposits and below ground heritage assets that exist.

Baseline Information: Baseline data is available from the Historic Environment Record (HER). The site overlooks the Fynn Valley, and occupies a location that was topographically favourable for early occupation of all periods. Finds including a Prehistoric worked flint, a Bronze Age razor and a Roman coin have been recovered from the site, indicative of occupation in the vicinity (HER no. MRM 029). Neolithic and Iron Age features have also been excavated on land immediately adjacent to the site (MRM 030), and other Prehistoric, Roman, Saxon and medieval finds have been recovered within 200m of the site boundary (MRM 022-023, MRM 028, WBG 007 and WBG 008).

Methodology: It is recommended that the following evidence be provided in the Environmental Impact Assessment, prior to submission of an outline application:

- A Cultural Heritage Desk-based Assessment, taking into account the result of investigations and discoveries in and around the proposed development area. This should include a map regression exercise and an aerial photographs assessment. The report should also consider the impact on listed buildings and their settings.
- The results of the geophysical survey.
- The results of a systematic trial trenched evaluation. To formulate a mitigation strategy, this should comprise a c. 5% sample of the site. The trenching design should be informed by the geophysics results but should also sample 'blank' areas to achieve even spatial coverage.
- The evidence presented should enable assessment of the impact of development on archaeological remains and whether there is any need for consideration of alternative opportunities in the layout of the site to allow for the *in situ* preservation of any archaeological sites.

¹ DCLG (1999) Circular 02/99: Environmental impact assessment, para. 84

² E.g. Natural England (2012) Health and Natural Environments - An evidence based information pack

³ <http://www.futurecommunities.net/socialdesign/190/cambourne-cambridgeshire>

- The Environmental Impact Assessment should include proposals to record and advance understanding of the significance of all onsite heritage assets before they are damaged or destroyed. Mitigation proposals for excavation before any groundworks commence should be discussed and agreed in principle with the Suffolk County Council Archaeology Service Conservation Team, with areas defined on the basis of the results of the field evaluation.
- Opportunities should be identified to enhance or better reveal the significance of any heritage assets for public benefit.

East Anglia One will cut through the middle of the site. However, it won't affect c. 9.5ha of the c. 13ha site. It's still possible for the cables of the East Anglia One project to be directionally drilled beneath this site so as to avoid any potential impacts on archaeology (if present), whereas housing will certainly cause an impact, and this can only be mitigated by avoidance through design (direct preservation) or excavation (preservation by record). There is a possibility that the site may be investigated first by the East Anglia One project.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the assessment work required and will, on request, provide specifications and advice for each stage of this work (Please see our website for further information on procedures and costs: <http://www.suffolk.gov.uk/libraries-and-culture/culture-and-heritage/archaeology/>)

Mineral Resources

Potential Impact: The footprint covers an area of over 12 hectares of greenfield land under agricultural use and with varying contours. The footprint of the site is partially within a Minerals Consultation Area. Policy 5 of the Minerals Core Strategy may be relevant here. The supporting statement infers the land is being progressed through the development framework for housing allocation. What status is this proposed allocation?

Baseline Information: Notwithstanding the lands present allocation status, investigation of sustainability options needs to be addressed. In line with the encouragement towards developers to address the sustainability of their sites and avoid unnecessary sterilisation of mineral resources, The size of this site and potential phasing opportunities could lend the development scheme to utilise in situ mineral resources to minimise importation of virgin material.

Any Environmental Statement should be considering:

- Mineral aspects - The mineral resource potential of the land and aspects for recovery of the in situ resource.
- Soil Resources - Soil handling techniques and use of the resource.
- Landscape - Potential impacts arising from the development would be the visual/landscape impacts from the scheme itself, not just its contextual relationship to landscape designations. Aspects of any cut and fill excavation works need to be fully assessed; appropriate cross sections should support this issue.

- Drainage - The development has been identified as suitable for a SuDS scheme. Appropriate infiltration testing and results for support of conclusions would be required. Investigation of potential suitable in situ resources, as in (i) above, and implications for any need to import/export materials off site.

Methodology: In general the application should also be demonstrating its commitment to energy efficiency and sustainability. Water saving devices such as individual water butts, solar panels as standard measures should be assessed together with the options for utilising grey water on individual/community basis.

Soils

Potential Impact: Consideration of the impact of soil is an integral part of the environmental assessment process. The protection, use and movement of soil should be considered from outset of a development project's planning, through its design and construction phases and on onto future maintenance.

Baseline Information: The County Council recommends having a soil resource survey carried out on site by suitable qualified and experienced soil scientist or practitioner at the earliest convenience and prior to any earth works operations. Reference should also be made to agricultural land classification.

Methodology: The County Council would recommend the applicant to refer to the DEFRA 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, 2009'.

Recreation, Open Space, Rights of Way

Potential Impact: Development at this location will impact on access and use of the existing Public Rights of Way network. The Environmental Statement should consider how the proposal interacts with public spaces and the Rights of Way network, which is relevant to consideration of landscape impacts, impacts on species and habitats, and impacts on population (in terms of health). Access to Martlesham Creek for recreational purposes is similarly relevant.

Baseline Information: The County Council would be pleased to supply information on the definitive Rights of Way network. The Sandlings Walk and the Fynn Valley Walk pass along south of the development site; these promoted recreational walks can be accessed via Martlesham Public Footpath No 11 which leads off Sandy Lane. Other bodies or parties may be able to provide information on other recreational uses. The screen shot below shows these promoted routes.

Methodology: Impacts on transport should be considered as part of the Transport Assessment of the proposal but, whilst government guidance on Transport Assessment does suggest that reference is made to health objectives, it is important that inter-relationships with health and wellbeing outcomes are clear and also considered (such as under the Public Health and Safety heading). The National Planning Practice Guidance (NPPG) notes the relationship between Environmental Impact Assessment and Transport Assessment.

Impacts on recreation in relation to health should be considered and screened for “significant” impacts (NPPG) that would warrant a health impact assessment.

Landscape and Visual Affects

Potential Impact: Detrimental impacts on the character of the landscape, the loss of characteristic/historic landscape features such as open arable land trees and hedgerows. Based on the data held by SCC the site appears to be within a Special Landscape Area (SLA) and adjacent to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Any development in this location appears likely to have an adverse impact on the SLA and may have an adverse indirect impact on the AONB and/ or an adverse impact on the setting of the AONB.

Detrimental impact on local visual amenity for users of rights of way, including the promoted Fynn Valley Path and also National Cycle route No.1.

Opportunities: To create an effective edge to the built environment that does not have significantly adverse impacts on the character of the surrounding countryside.

Baseline Information: The applicant should refer to the Suffolk Landscape Character Assessment 2008 (updated 2011). The applicant should also refer to material on the character of the Local Landscape that has been produced or is held by the AONB unit.

Methodology: A Landscape and Visual Impact Assessment (LVIA) in accordance with GLVIA3. Any Photo-montages should be prepared in accordance with Landscape Institute Advice Note11/01.

All viewpoints and any photo-montage locations should be agreed with LPA before this work is carried out.

It should be noted that the setting of heritage assets are not a matter for the LVIA and should be dealt with, in accordance with EH guidelines, within a Heritage Assessment. <http://www.english-heritage.org.uk/publications/setting-heritage-assets/setting-heritage-assets.pdf>

It should also be noted that the impacts of the development on the SPA/SSSI are an ecological matter and it is not appropriate to assess these within the LVIA of an Environmental Statement. The LVIA should clearly assess the proposal, identifying residual impacts in both visual and landscape terms. It should have particular regard to assessing the impacts of the proposal on the AONB itself as well as the setting of the AONB

Natural Heritage

Potential Impact: Has the potential to have an adverse indirect impact on the SPA features and the SSSI. Therefore the potential impact on the relevant species and

habitats must be effectively assessed. Increased disturbance from recreational activity appears likely to be an issue in this case.

Given the proximity of the SPA, the applicant must provide sufficient information to allow the LPA to undertake a project level Habitats Regulations Assessment.

It should also be noted that there are a series of locally designated wildlife sites around the site including Martlesham Creek CWS and Seckford Hall Campsite CWS. Given the nature of the site and the habitats present, reptiles and bats may also be adversely impacted by any future development of the site

Opportunities: There are opportunities for ecological enhancement of habitats and species associated with this type of development. The EIA should explore options for habitat connectivity and consideration should also be given to the likelihood of species colonising the new habitat and any measures needed to ensure their protection.

Baseline Information: The desktop assessment should be prepared in consultation with the Suffolk Biological Records Centre as there are local records, which should inform survey requirements including Priority Species.

Methodology: It is recommended that all surveys undertaken to inform the assessment of this development on biodiversity should follow nationally agreed guidelines and be undertaken in the appropriate season by appropriately qualified ecological consultants.

The assessment of likely ecological impacts needs to include sufficient mitigation measures to minimise the impacts as well as identify compensation or offsetting requirements for residual effects.

Noise and vibration

Potential Impact: The proposed site would not be expected to be a significant contributor to local traffic and lead to increases in noise levels. It is borderline as to whether the site should be assessed to ensure that, since it is stated as being a high class development, it is well designed with respect to protection of the proposed dwellings from local road traffic noise sources and that a good standard is achieved. There is insufficient information to establish how this aspect was scoped out.

Traffic and Transport

Potential Impact: This proposal will have significant impacts on the local transport network, during construction and operational use of the site.

Baseline Information: The promoter of this site is responsible for collecting baseline information on the local highway network.

Methodology: The proposal should be assessed through a Transport Assessment, using the methodology set out in the Department for Transport's 2007 'Guidance on Transport Assessment'. It should be accompanied by a Travel Plan that considers all modes of transport, and a plan for the management of construction traffic. In addition, as noted in the National Planning Practice Guidance, there is a need for the EIA process to fulfil the role of assessing cumulative and indirect environmental impacts and the relationship between them in respect of traffic and transport.

The Transport Assessment is to include the roundabouts at A12 / B1438 and A12 / B1079 junctions, and the roundabout adjacent to the proposed site on B1438 road to Woodbridge. No vehicular access should be taken from Spring Lane, access to site for cyclists and pedestrians only.

Main access to site would be off a new roundabout replacing that on the B1438 Woodbridge Road, with existing roads re-aligned as necessary. There should be walking / cycle routes from the site to local schools and into Woodbridge, and links to rights-of-way and bus services in the area. No vehicular access should be taken from Spring Lane, cyclists and pedestrians only.

Waste

Potential Impact: Waste will be generated during construction and occupation of the site. This response assumed that no additional waste material will be imported onto the site.

Baseline Information: National statistics of construction and municipal wastes (by volume) are available.

Methodology: Assessment of the Scheme will be undertaken in line with the DRMB Interim Guidance Note 153/11 – Guidance on the Environmental Assessment of Material Resources. A Waste Strategy Report should be provided in the ES, including a review of options to how the waste management hierarchy could be delivered on-site.

Water Environment

Potential Impact: This proposal will have a main effect on the surface water hydrology

Baseline Information: The site should discharge no more than the greenfield rate of run-off by utilising the existing geology and topographical properties to ensure a balanced water management system is effective and sustainable.

Methodology: The proposal should be assessed for using a drainage system that is designed in accordance with the CIRIA Guide C697.

Socio Economics

From an economic development perspective Suffolk County Council would have no objection providing the development did not prejudice the ability to lay (and later access) cables across the site to accommodate electricity feed(s) from the massive EAOW1 wind farm development. The EAOW1 project is a major economic development opportunity for Suffolk and the supply of renewable energy from it into the national grid is of course also of national importance in terms of electricity supply. Provided that the residential layout can incorporate the laying and maintain access to these supply cables then Suffolk County Council's concerns are met.

I hope that these comments are useful. Please get in touch if I or any other County Council officer can clarify any of the comments above, or supply useful information.

Yours sincerely,

Irina Davis
Planning Officer (Sustainability Appraisal)
Economy, Skills and Environment Directorate

Appendix 4: Draft S106 Heads of Terms

**Land off Dukes Park, Woodbridge
Draft Heads of Terms for Section 106 Agreement**

Proposed Development: Outline Planning Permission for up to 215 dwellings with public open space and landscape with all matters reserved, except for access and a retail 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

Local Planning Authority:

Suffolk Coastal District Council
Melton Hill,
Woodbridge,
Suffolk IP12 1AU

Obligations:

1. Open Space

The Agreement will require the Developer to provide onsite informal open space and an equipped children's play area. Appropriate phasing requirements will be specified together with the requirement to agree. The open space will be put into a management company in perpetuity.

2. Public Transport Improvements

The Agreement will require the Developer to pay reasonable contributions (the amount and phasing of which to be agreed with the Council) towards the costs of bus stop infrastructure.

3. Highway Contributions

Subject to meeting the appropriate tests of necessity and reasonableness the Agreement will require the Developer to pay necessary contributions (the amount and phasing of which to be agreed with the Council) towards the costs of improvements to highway and public transport infrastructure in the vicinity of the Development.

The agreement will require the Developer to provide a contribution towards the provision towards improvements of the pedestrian footpath along Ipswich Road.

4. Travel Plan

The Agreement will require the Developer to commit to the production and implementation of a travel plan.

5. Legal Costs

The Agreement will require the Developer to provide reasonable legal costs for County Council and District Council monitoring.

6. Affordable Housing

The Agreement will require the Developer to provide up to 33% affordable housing in accordance with above current Suffolk Coastal District Council Planning policy.

7. Other

Other contributions may be identified through the planning consultation process, and subject to meeting the appropriate tests of necessity and reasonableness, consideration will be given to their inclusion.

Appendix 5: Draft Conditions

Schedule of conditions in respect of Outline Planning Permission for up to 215 dwellings with public open space and landscape with all matters reserved, except for access and a retail 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

Time Period

1. Application for approval of reserved matters must be made not later than the expiration of 3 years from the date of this permission and the development must be begun not later than which ever is the later of the following dates:
 - (i) the expiration of 3 years from the date of this permission,
 - (ii) the expiration of 2 years from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reserved matters

2. Details of appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
3. The approval of the plans and particulars of the reserved matters referred to in Condition 2 above can be produced in phases.

Approved Plans

4. The development hereby permitted shall comprise no more than 215 dwellings.
5. The development hereby permitted shall be carried out in accordance with the details shown on the approved access drawings outlined in the Hydrock Transport Assessment (November, 2015)

Affordable Housing

6. The development shall not begin until a scheme for the provision of affordable housing as part of the development has been submitted to and approved in writing by the local planning authority. The affordable housing shall be provided in accordance with the approved scheme and shall meet the definition of affordable housing in the National Planning Policy Framework and National Planning Practice Guidance. The scheme shall include:

- a. the numbers, type, tenure and location on the site of the affordable housing provision to be made which shall consist of not less than 33% of housing units/bed spaces provided on-site;
- b. the timing of the construction of the affordable housing and its phasing in relation to the occupancy of the market housing;
- c. the arrangements for the transfer of the affordable housing to an affordable housing provider [or the management of the affordable housing] (if no Registered Provider is involved);
- d. the arrangements to ensure that such provision is affordable for both first and subsequent occupiers of the affordable housing;
- e. the occupancy criteria to be used for determining the identity of occupiers of the affordable housing and the means by which such occupancy criteria shall be enforced; and
- f. the timing of the payment of a commuted sum.

Site investigation / contaminated land

- 7. No part of the development hereby permitted shall be commenced on site unless and until:
 - a. A site investigation has been designed for the Site using the information obtained from the desktop investigation previously submitted in respect of contamination. This shall be submitted to and approved in writing by the Local Planning Authority prior to the investigation being carried out on the Site; and
 - b. The site investigation and associated risk assessment have been undertaken in accordance with details submitted to and approved in writing by the Local Planning Authority; and
 - c. A method statement and remediation strategy, based on the information obtained from 'b' above, including a programme of works, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved remediation strategy.

Tree protection measures

- 8. The development hereby approved, shall be carried out in accordance with recommendations of the approved FPCR Arboricultural Assessment dated November 2015 submitted with the application. No development shall begin until details of the means of protecting trees and hedges within and immediately adjacent to the Site of the particular phase, including root structure from injury or damage prior to or during the development works have been submitted to and approved in writing by the Local Planning Authority. Such protection measures shall be implemented before any works are carried out and retained during building operations and furthermore, no excavation, Site works, trenches or channels shall be cut or laid or soil, waste or other materials deposited so as to cause damage or injury to the root structure of the trees or hedges.

Habitat Protection Measures

9. No development shall begin until details of the means of protecting retained habitats on Site, identified in the submitted FPCR Ecological Appraisal dated November 2015, has been submitted to and approved in writing by the Local Planning Authority. Such protection measures shall be implemented before any works are carried out and retained during building operations.

Nesting Birds

10. No clearance of trees and shrubs in preparation for (or during the course of) development shall take place during the bird nesting season (March - August inclusive) unless a bird nesting survey has been submitted to and approved in writing by the Local Planning Authority to establish whether the Site is utilised for bird nesting. Should the survey reveal the presence of any nesting species, then no development shall take place within those areas identified as being used for nesting during the period specified above.

Construction / Protection Method Statement

11. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
 - a. the parking of vehicles of site operatives and visitors
 - b. loading and unloading of plant and materials
 - c. storage of plant and materials used in constructing the development
 - d. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - e. wheel washing facilities
 - f. measures to control the emission of dust and dirt during construction
 - g. a scheme for recycling/disposing of waste resulting from demolition and construction works
 - h. a scheme to control noise during the construction phase.

Archaeology

12. No development shall commence until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority. The written scheme of

investigation shall include the submission of a written report of the results of the investigation on completion of the said works.

Flooding and Drainage

13. The development hereby permitted shall be carried out in accordance with the Flood Risk Assessment prepared by Hydrock, November 2015.
14. No development, other than the formation of the site access, shall begin until a surface water drainage scheme, including details of a surface water regulation system for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development has been submitted to and approved in writing by the Local Planning Authority. If required, such details shall be submitted and approved on a phased basis. The submission(s) shall include details of how the scheme shall be maintained and managed after completion of the development and shall subsequently be implemented in accordance with the approved details before the development is completed.

Landscape Implementation

15. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following first occupation of the buildings hereby approved or the completion of the development, whichever is the sooner. Any trees or plants which, within a period of five years from the completion of the development, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Habitat and Landscape Management Plan

16. Prior to the commencement of development a Habitat and Landscape Management Plan (HLMP), including the long-term design objectives, management responsibilities and maintenance schedules for not less than 7 years for all areas of habitat and landscaping other than those within the curtilages of individual dwellings, shall be submitted to and approved in writing by the Local Planning Authority, and the design, management objectives and maintenance of the landscaped areas shall thereafter be in accordance with the approved HLMP.

Travel Plan

17. Prior to the first occupation of any dwelling, an Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter and prior to the occupation of the 50th dwelling, a Final Travel Plan shall be submitted to and approved in writing by the Local

Planning Authority. This Final Travel Plan shall include objectives, targets, mechanisms and measures to achieve targets and implementation timescales, monitoring and review provisions and provide for the appointment of a travel plan co-ordinator. The development shall thereafter be implemented in accordance with the approved Travel Plan.

Appendix 6: Gladman Site Delivery

SITE ADDRESS	NUMBER OF DWELLINGS	% AFFORDABLE	OUTLINE/IN PRINCIPLE PLANNING APPLICATION DETERMINATION DATE	DATE LAND SOLD	PURCHASER	RESERVED MATTERS/MATTERS DETERMINATION DATE	COMMENCEMENT OF DEVELOPMENT	TIMESCALE FROM INITIAL PLANNING PERMISSION TO SITE START	COMMENT
North Dean Avenue, Keighley West Yorkshire	190	15% (28NO)	12 May 2010	May 2011	Barratt Homes	Reserved matters approved May 2011 (it was submitted in December 2010)	June 2011	13 months	
Golden Nook Farm, Cuddington. Cheshire	150	30% (45NO)	20 Feb 2012	July 2012	Bovis Homes	Approved August 2012	September 2012 (road & demolition works)	7 months	
Henthorn Road, Clitheroe. Lancashire	270	30% (81NO)	26 March 2012	December 2012	Barratt Homes & Taylor Wimpey	Approved March 2013	March 2013	12 months	
Wigan Road, Clayton le Woods. Lancashire	300	30% (90NO)	Original outline 21 July 2011. New permission 4 April 2012	December 2012	David Wilson Homes/ Taylor Wimpey	Approved March 2013	May 2013	13 months	A s.73 Application was submitted due to a challenge to the permission on highway grounds. This new application was fully supported by Chorley Borough Council and the Highways Dept.
Loachbrook Farm, Congleton. Cheshire	200	30% (60NO)	20 March 2013 (date of High Court Challenge).	October 2013	Bovis Homes	14 June 2013	November 2013	8 months	
Byefield Road, Woodford Halse. Daventry	200	30% (60NO)	15 February 2013	Conditional exchange of contracts October 2013	Taylor Wimpey	July 2014	Expected Autumn 2014	21 months	Very complicated land deal due to severe technical constraints relating to drainage. A full hydraulic modelling assessment had to be undertaken with Thames Water which took over 8 months to complete and then a detailed drainage design had to be completed and agreed with Thames Water prior to the land sale completing.
Warmingham Lane, Middlewich. Cheshire	194	30% (58NO)	9 January 2013	June 2014	Morris Homes	March 2014	June 2014	17 months	Original land sale to Bellway Homes did not proceed due to their change of mind. Land was re-marketed
Hannay Road, Steventon. Oxfordshire	50	40% (20NO)	23 April 2013	September 2013	David Wilson Homes	May 2014	May 2014	13 months	
Queens Drive , Nantwich. Cheshire	270	30% (81NO)	1 March 2013	September 2014	Barratt Homes & Bovis Homes	July 2014	September 2014	18 months	Land sale took longer than expected as the site was sold to two developers. However, that means the delivery rates will be higher and all 270 dwellings will be built within 5 years of commencement.
Eliburn, Livingston. West Lothian	87	15% (13NO)	3 March 2014	Sale agreed when s.75 signed in early 2014	Barratt Homes	Submitted March 2014, approved June 2014.	Sale concluded July 2014; site works underway in August 2014.	5 months	
Barford Road, Bloxham. Oxfordshire	75	35% (26NO)	23 September 2013	January 2014	Bovis Homes	May 2014	July 2014	10 months	
Edgmond Road, Newport. Shropshire	85	35% (30NO)	3 July 2013	July 2013	Bovis Homes	March 2014	July 2014	12 months	

SITE ADDRESS	NUMBER OF DWELLINGS	% AFFORDABLE	OUTLINE/IN PRINCIPLE PLANNING APPLICATION DETERMINATION DATE	DATE LAND SOLD	PURCHASER	RESERVED MATTERS DETERMINATION DATE	COMMENCEMENT OF DEVELOPMENT	TIMESCALE FROM INITIAL PLANNING PERMISSION TO SITE START	COMMENT
Boroughbridge Road, Knaresborough. Harrogate	170	40% (68NO)	9 July 2014	October 2014	David Wilson Homes	(submitted) November 2014	Expected March 2015	5 months	
North Road, Glossop. High Peak	150	30% (45NO)	12 June 2014	December 2014	Taylor Wimpey	(anticipate submission) February 2015)	Expected June 2015	12 months	
Sherborne Avenue, Chester	40	30% (12NO)		Conditional exchange December 2014	Stewart Milne Homes	Detailed planning application to be submitted 30 January 2015	Anticipated June 2015	Expected 2 months	Land is an allocation and a detailed planning application is to be submitted.
Hannay Road, Steventon (Phase II). Oxfordshire	65	40% (26NO)			David Wilson Homes	January 2015	Anticipated May 2015	Expected 4 months	Land is a second phase to an already approved scheme which we sold in September 2013. A detailed planning application has been submitted.
Abbeyfields, Sandbach. Cheshire	280 approved (154 being sold initially)	30% (46NO)	Original outline 17 October 2013. New permission 7 October 2014	Conditional exchange of contracts December 2014	Redrow Homes and Anwyl Homes	Reserved matters submission December 2014	Anticipated May 2015	From new planning permission 7 months	New application was resolved to approve in February 2014 but it took CEC 8 months to issue a new decision notice. GDL had to pay £10k for external solicitor's costs for the LPA just to get this resolved.
Nantwich Road, Tarporley. Cheshire	100	30% (30NO)	Original outline 29 August 2013. New permission 27 November 2014	Conditional exchange of contacts December 2014	David Wilson Homes	Reserved matters submission February 2015	Anticipated July 2015	From new planning permission 8 months	New application was resolved to approve in May 2014 but took CWaC 6 months to issue a new decision notice

Appendix 7: Utilities Appraisal

Gladman Developments Ltd.

**Land off Dukes Park
Woodbridge**

Utilities Statement

Sep 2015

Utilities Appraisal – Woodbridge

Electricity

Plans supplied by UK Power Networks indicate there is an existing overhead high voltage (HV) line crossing the site from a ground mounted transformer on the south eastern boundary to the western side of the site. This will need to be retained with access maintained or the cable diverted within the new infrastructure of the site; no excessive costs or engineering difficulties are anticipated for these works. There are also cables running along the southern boundary of the site feeding the Sluice Farm adjacent to the railway. The proposed development allows for the easement and access required and will be unaffected by the proposed development.

A budget connection quotation has been received from UK Power Networks (See Appendix A) which indicates the anticipated point of connection for this scheme would be off the existing HV cable crossing the site. A new on site secondary substation would be required to accommodate the new load but no engineering difficulties or excessive costs are anticipated for these works.

Gas

Information from National Grid indicates there are no existing mains within the site boundary. There is an existing low pressure (LP) main within Ipswich Rd near the proposed site entrance off Ipswich Rd and there is a LP main within Sandy Lane adjacent to the southern proposed site entrance. There is also high pressure (HP), medium pressure (MP) and LP mains within Top Street on the western boundary.

Given the proximity of the LP and MP networks the proposed site could be fed from the existing mains within the vicinity of the site entrances; a new LP main would be installed on site with associated service connections as required. There are no engineering difficulties or excessive costs anticipated for these works.

Water

The plans supplied by Anglian Water indicate there is an existing 300mm main crossing the site from north to south. Access and easement distances will need to be maintained for this main within the detailed design layout. There is also an existing main running along Top Street within the vicinity of the site entrance.

The Pre Development Report from Anglian Water (See Appendix B) confirms that capacity will be available from the existing 300mm AC water main near Dukes Park at National Grid Reference (NGR) TM2554847724; a new mains infrastructure would be laid on site to serve the new domestic properties. No engineering difficulties or excessive costs are anticipated for these works.

Telecoms

BT records indicate there is no existing plant within the site boundary. There is underground plant running along Ipswich Road to the north and Top Street to the west together with overhead plant along Sandy Lane to the south east; no major diversions are expected.

The proposed new site could be fed by extending this existing infrastructure. Broadband connections are available within this area but high speed fibre connections are yet to be installed.

Summary

Initial investigations have not highlighted any concerns or engineering difficulties with servicing the proposed development with new gas, water, electric or telecommunication connections.

New infrastructure and service connection costs are anticipated to be in line with those expected for a standard development of this scale.

It should be noted that all Utility Providers have a licence obligation to ensure that any connections to the system comply with all relevant regulations, legislation and Engineering Recommendations so therefore do not have an adverse effect to the supply and quantity of supply to existing customers.

Appendix A – UK Power Networks Budget Electric Quote

Mrs Sarah Kennard
Gladman Developments Ltd
Gladman House
Alexandria Way
Congleton
CW12 1LB

16th September 2015
Our Ref: 8500016437/QID3000003608

Dear Mrs Kennard

Site Address: Dukes Park, Martlesham, Woodbridge, IP12 4RB

Thank you for your recent enquiry regarding the above premises. I am writing to you on behalf of Eastern Power Networks PLC the licensed distributor of electricity for the above address trading as UK Power Networks.

I am pleased to be able to provide you with a budget estimate for the work. It is important to note that this budget estimate is intended as a guide only. It may have been prepared without carrying out a site visit or system studies. No enquiry has been made as to the availability of consents or the existence of any ground conditions that may affect the works. It is not an offer to provide the connection and nor does it reserve any capacity on UK Power Networks' electricity distribution system.

1. Budget estimate

The budget estimate for this work is:

£195,000.00 (exclusive of VAT) if the Point Of Connection (POC) is to our High Voltage network on site. This estimate includes for the installation of an on-site substation with ring main unit to be located centrally. Low voltage mains will be laid around the site for 215x gas heated houses. Low voltage cables will also need to be laid to the site boundary to the south and south west to maintain existing connections to allow for existing pole mounted transformers to be removed.

An additional sum of **£50,000.00** may be chargeable for the diversion of the existing high voltage circuit that runs through the site. This includes diverting the existing underground and overhead line, reconnecting an existing off site transformer to the new high voltage cable. There are existing pole mounted transformers to be removed, and low voltage cables will need to be laid from the new on-site substation to maintain existing off-site connections, this work will need to be completed before any existing network can be de-energised / diverted.

2. Budget estimate assumptions

This budget estimate is based on the following assumptions:

- The most appropriate Point of Connection (POC) is as described above.
- A viable cable route exists along the route we have assumed between the Point of Connection (POC) and your site.

- In cases where the Point of Connection (POC) is to be at High Voltage, that a substation can be located on your premises at or close to the position we have assumed.
- Where electric lines are to be installed in private land UK Power Networks will require an easement in perpetuity for its electric lines and in the case of electrical plant the freehold interest in the substation site, on UK Power Networks terms, without charge and before any work commences.
- You will carry out, at no charge to UK Power Networks, all the civil works within the site boundary, including substation bases, substation buildings where applicable and the excavation/reinstatement of cable trenches.
- Unless stated in your application, all loads are assumed to be of a resistive nature. Should you intend to install equipment that may cause disturbances on UK Power Networks' electricity distribution system (e.g. motors; welders; etc.) this may affect the estimate considerably.
- All UK Power Networks' work is to be carried out as a continuous programme of work that can be completed substantially within 12 months from the acceptance of the formal offer.

Please note that if any of the assumptions prove to be incorrect, this may have a significant impact on the price in any subsequent quotation. You should note also that UK Power Networks' formal connection offer may vary considerably from the budget estimate. If you place reliance upon the budget estimate for budgeting or other planning purposes, you do so at your own risk.

If you would like to proceed to a formal offer of connection then you should apply for a quotation, Please refer to our website http://www.ukpowernetworks.co.uk/internet/en/help-and-advice/documents/the_connection_process.pdf for '**The connection process**' which details our application process. To help us progress any future enquiry as quickly as possible please quote the UK Power Networks Reference Number from this letter on all correspondence.

If you have any questions about your budget estimate or need more information, please do not hesitate to contact me. The best time to call is between the hours of 9am and 4pm, Monday to Friday. If the person you need to speak to is unavailable or engaged on another call when you ring, you may like to leave a message or call back later.

Yours sincerely



Angela Freeman
Project Designer
Tel: 01279 824622
Email: PrelimsEPN@ukpowernetworks.co.uk

Appendix B – Anglian Water Pre Development Quote

Pre-Planning Assessment Report

Land Off Dukes Park, Martlesham

Section 1: Proposed Development

Thank you for submitting a pre-planning enquiry. This has been produced for Gladman Developments Ltd. Your reference number is **00008932**. If you have any questions upon receipt of this report, please contact Carl Lee on 01733 414690 or email planningliaison@anglianwater.co.uk.

The response within this report has been based on the following information which was submitted as part of your application:

List of Planned Developments	
Type of Development	No. Of Units
C3 Dwellings	215

The anticipated residential build rate is:

Year	2015	2016	2017	2018
Build Rate	50	100	50	15

- The grid reference for the site is TM2560047700.
- The site currently does not have planning permission and is located on a greenfield site.

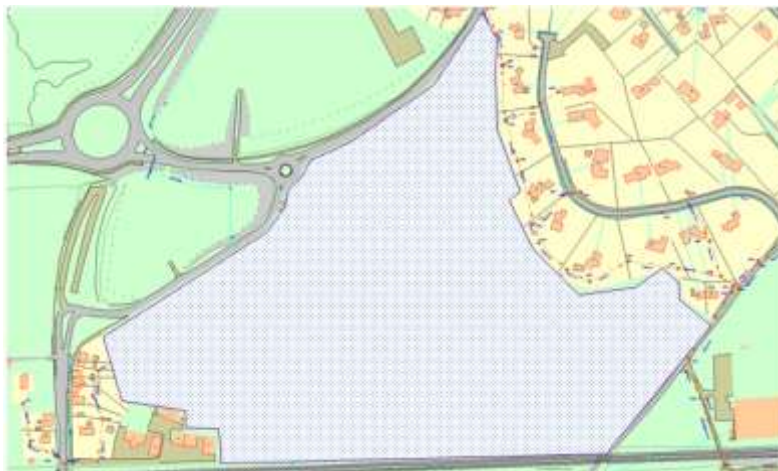


Figure 1: Location of proposed development.

The comments contained within this report relate to the public water mains and sewers indicated on our records. Your attention is drawn to the disclaimer in the useful information section of this report.

Section 2: Assets Affected

In addition to any private assets that may be located on your site, there are public assets, owned and maintained by Anglian Water, located next to your site. The statutory easement of these assets overlap into your development site. The following table confirms the easement that will need to be taken into consideration when designing your layout.

Water and Used Water Easement Information		
Asset Type	Pipe Size (mm)	Total Easement Required (m)
Water Mains	300	3.0 m either side of the centre line

If it is not possible to avoid our assets then the water main/sewer may need to be diverted in accordance with Section 185 of the Water Industry Act (1991). We have a duty to divert our sewerage infrastructure if requested to do so although this would be at your expense. You will need to make a formal application if you would like a diversion to be considered. A copy of the section 185 diversion application form can be found at www.anglianwater.co.uk/developers

Due to the private sewer transfer in October 2011 many newly adopted public used water assets and their history are not indicated on our records. You also need to be aware that your development site may contain private water mains, drains or other assets not shown on our records. These are private assets and not the responsibility of Anglian Water but that of the landowner.

Section 3: Water Supply

In examining the available capacity for your development site we assess the capacity and costs for two categories of water main. These are:

Strategic – these are the offsite potable water mains which deliver water within an area to a large number of development sites often across a number of towns. The strategic provision of these water mains enables us to provide of the cheapest solution across a large geographical area.

Local reinforcement – these are the offsite potable water mains that connect your site to the closest available public water main. Alternatively, reinforcement may be needed to protect existing houses against the loss of water or water pressure.

On most sites we also have two categories of water mains the **Spine Mains** and **Housing Estate Mains (HEMS)**. To support your budgeting arrangements we have also examined the estimated cost for delivering the onsite water mains needed for a site of your size.

Water Supply Network

The water supply to the proposed development site can be provided from the existing mains as listed below. The water main has adequate capacity for your development site. Anglian Water cannot reserve capacity and therefore you are recommended to formally apply for a connection at your earliest convenience. Please note that available capacity in our network can be reduced at any time due to increased requirements from existing businesses and houses as well as from new housing and new commercial developments.

The connection point for the site will be from the existing 300mm AC water main near Dukes Park at National Grid Reference (NGR) TM2554847724.

Water Budget Costs

The costs provided in this report are based on the current information available. These costs are provided as an indicative estimate to help inform you on a budget for supplying water to your site.

- The **strategic costs** are based on a proportion of the total strategic scheme cost. These costs are calculated based on the flow rate that your development requires as compared to the total flow rate that the strategic main has been designed against.
- The **local reinforcement** costs have been calculated based on the typical costs of providing a length of water main across a similar distance as required for this development site.

- The onsite **Spine mains** and **HEMS** costs are provided based on historic Anglian Water construction information.

Based on these estimated and predicted costs, the cost to provide water to your site:

Predicted costs for supplying water to your development	
Estimated Local reinforcement Mains	NONE
Estimated Onsite Water Mains	
Onsite water mains costs	£ 129,000.00
Total Cost for providing the water infrastructure	£ 129,000.00

The above table provides an estimated breakdown of the costs to supply the water infrastructure. A more detailed cost provision will be provided following a formal application for a new water mains or water connection.

Financing your water costs

You will be required to partly contribute towards the cost of supplying water to your site. The amount that you contribute is dependent on your preferred method of financing the site. The Water Industry Act enables you to finance the water mains via either the relevant deficit or discounted aggregate deficit. A full breakdown of these methods is provided on our website at www.anglianwater.co.uk/developers.

In essence, the two deficit options allow us to offset future revenue (from the end customer after they purchase your houses) from the scheme cost. The scheme cost is determined as a hypothetical fixed rate loan provided over 12 years. The two statutory options are:

1. **Relevant deficit.** This takes the actual annual revenue offset from the actual annual scheme cost repayment. The difference is paid every year over the first twelve years of your site or until the revenue exceeds the annual scheme cost.
2. **Discounted aggregate deficit.** This enables us to offset the estimated future revenue from the scheme cost. This is calculated over the first twelve years of your site and a commuted sum is calculated as an upfront net present value amount.

Your estimated contribution towards the construction costs are provided in the table below:

Scheme Title:	Land Off Dukes Park
Developer:	Gladman Development Ltd

Year	Annual Build Rate
1	0
2	50
3	100
4	50
5	15
6	0
7	0
8	0
Total	215

Estimated Construction costs	
Onsite water	£ 129,000.00
Offsite water	£ 0
Estimated Scheme Cost	£ 129,000.00

Your estimated contribution towards construction costs	
Relevant Deficit	£ 18,624.21
Discounted Aggregate Deficit	£ 17,727.46

In addition, you also have the ability to construct the onsite water mains under a self-lay agreement. In such cases, an Asset Payment is made by Anglian Water following commissioning and adoption of the assets. The Asset Payment is calculated as required in the Water Act 2003. For more information on the self-lay of water mains please see www.anglianwater.co.uk/developers/self-lay.

You will also need to budget for both infrastructure charges and connection costs. The 2015/16 charges are:

Infrastructure Charge	£351.00	per connection
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Please note that we offer alternative types of connections depending on your needs and these costs are available in our annual charges booklet, which can be downloaded from www.anglianwater.co.uk/developers/charges.

Section 4: Map of Proposed Connection Points

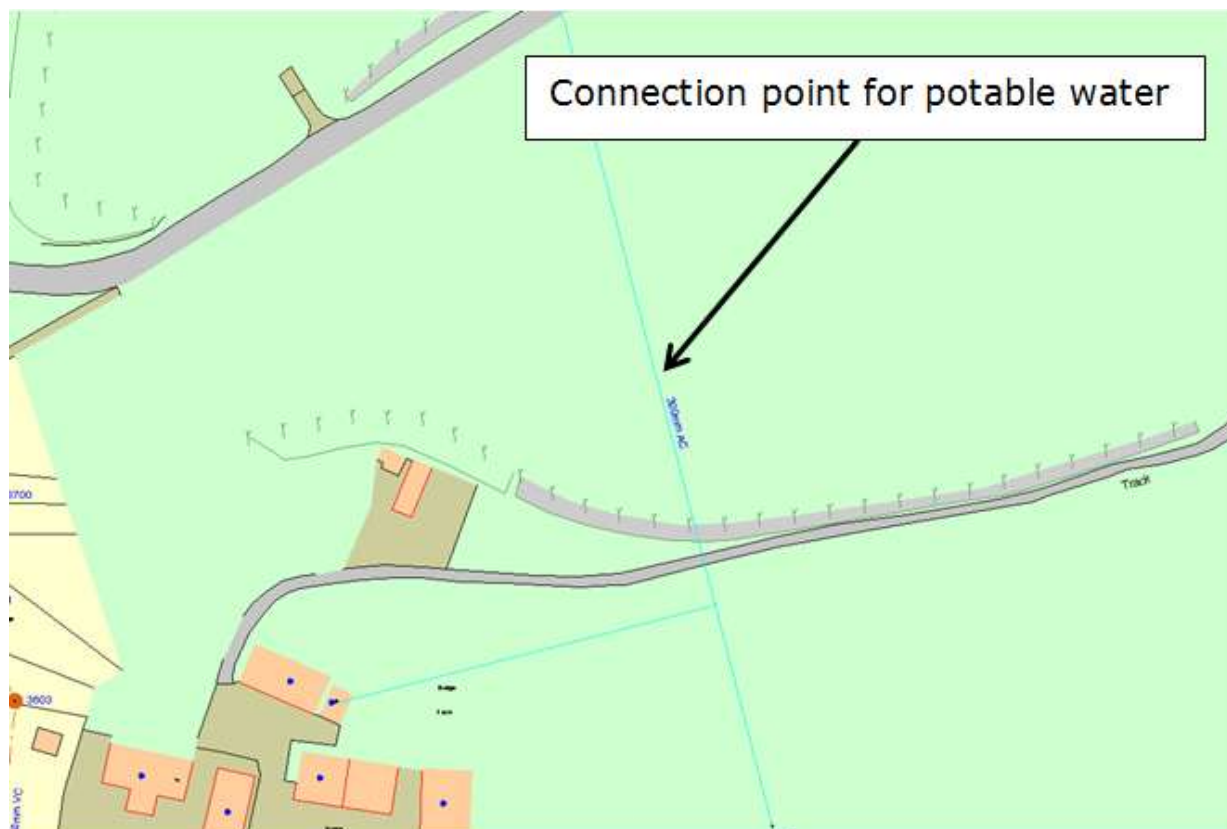


Figure 1: Showing your water point of connection at Land Off Dukes Park

Section 5: Useful Information

Water

Water Industry Act – Key Water Sections:

- **Section 41:** This provides you with the right to requisition a new water main for domestic purposes to connect your site to the public water network.
- **Section 45:** This provides you with the right to have a connection for domestic purposes from a building or part of a building to the public water main.
- **Section 51A:** This provides you with the right to provide the water main or service connection yourself and for us to vest them into our company.
- **Section 55:** This applies where you request a supply of water for non domestic premises.
- **Section 185:** This provides you with the right to make a reasonable request to have a public water main, sewer or public lateral drain removed or altered, at your expense. Details on how to make an application and the s185 form is available on our website at <http://www.anglianwater.co.uk20/developers> or via our Developer Services team on 08457 60 66 087.

Details on how you can make a formal application for a new water main, new connection or diversion are available on from our Developer Services team on 08457 60 66 087 or via our website at www.anglianwater.co.uk/developers

If you have any other queries on the rights to requisition or connect your housing to the public water and sewerage infrastructure then please contact our developer services team at: Developer Services, Anglian Water, PO Box 495, Huntingdon, PE29 6YY or Telephone: 0845 60 66 087 or Email: developerservices@anglianwater.co.uk

Water pressure and flow rate: The water pressure and consistency that we must meet for your site is laid out in the Water Industry Act (1991). This states that we must supply a flow rate of 9 litres per minute at a pressure of 10 metres of head to the external stop tap. If your water pressure requirements exceed this then you will need to provide and maintain any booster requirements to the development site.

Self Lay of Water Mains: A list of accredited Self Lay Organisations can be found at www.lloydsregister.co.uk/schemes/WIRS/providers-list.aspx.

Used Water

Water Industry Act – Key Used Water Sections:

- **Section 98:** This provides you with the right to requisition a new public sewer. The new public sewer can be constructed by Anglian Water on your behalf. Alternatively, you

can construct the sewer yourself under section 30 of the Anglian Water Authority Act 1977.

- **Section 102:** This provides you with the right to have an existing sewerage asset vested by us. It is your responsibility to bring the infrastructure to an adoptable condition ahead of the asset being vested.
- **Section 104:** This provides you with the right to have a design technically vetted and an agreement reached that will see us adopt your assets following their satisfactory construction and connection to the public sewer.
- **Section 106:** This provides you with the right to have your constructed sewer connected to the public sewer.
- **Section 185:** This provides you with the right to have a public sewerage asset diverted.

Details on how to make a formal application for a new sewer, new connection or diversion are available on our website at www.anglianwater.co.uk/developers or via our Developer Services team on 08457 60 66 087.

Sustainable Drainage Systems:

Many existing urban drainage systems can cause problems of flooding, pollution or damage to the environment and are not resilient to climate change in the long term. Therefore our preferred method of surface water disposal is through the use of Sustainable Drainage Systems (SuDS). SuDS are a range of techniques that aim to mimic the way surface water drains in natural systems within urban areas. For more information on SuDS, please visit our website at <http://www.anglianwater.co.uk/developers/suds.aspx>. We also recommend that you contact the Lead Local Flood Authority (LLFA) for the area to discuss your application.

Private Sewer Transfers: Sewers and lateral drains connected to the public sewer on the 1 July 2011 transferred into Water Company ownership on the 1 October 2011. This follows the implementation of the Floods and Water Management Act (FWMA). This included sewers and lateral drains that were subject to an existing Section 104 Adoption Agreement and those that were not. There were exemptions and the main non-transferable assets were as follows:

- Surface water sewers and lateral drains that did not discharge to the public sewer, e.g. those that discharged to a watercourse.
- Foul sewers and lateral drains that discharged to a privately owned sewage treatment/collection facility.
- Pumping stations and rising mains will transfer between 1 October 2011 and 1 October 2016.

The implementation of Section 42 of the FWMA will ensure that future private sewers will not be created. It is anticipated that all new sewer applications will need to have an approved section 104 application ahead of a section 106 connection.

Encroachment: Anglian Water operates a risk based approach to development encroaching close to our used water infrastructure. We assess the issue of encroachment if you are planning to build within 400 metres of a water recycling centre or, within 15 metres to 100 metres of a pumping station. We have more information available on our website at <http://anglianwater.co.uk/developers/encroachment.aspx>

Locating our assets: Maps detailing the location of our water and used water infrastructure including both underground assets and above ground assets such as pumping stations and recycling centres are available from www.digdat.co.uk. All requests from members of the public or non-statutory bodies for maps showing the location of our assets will be subject to an appropriate administrative charge. We have more information on our website at: www.anglianwater.co.uk/developers/our-assets/

Summary of charges: A summary of this year's water and used water connection and infrastructure charges can be found at <http://www.anglianwater.co.uk/developers/charges/>

Disclaimer: The information provided within this report is based on the best data currently recorded, recorded within the last 12 months or provided by a third party. The position must be regarded as approximate. If there is further development in the area or for other reasons the position may change.

The accuracy of this report is therefore not guaranteed and does not obviate the need to make additional appropriate searches, inspections and enquiries. You are advised therefore to renew your enquiry should there be a delay in submitting your application for water supply/sewer connection to re-confirm the situation.

Any cost calculations provided within the report are estimated only and may be subject to change.

The responses made in this report are based on the presumption that your proposed development obtains planning permission. Whilst this report has been prepared to help assess the viability of your proposal, it must not be considered in isolation. Anglian Water supports the plan led approach to sustainable development that is set out in the National Planning Policy Framework (NPPF). As a spatial planning statutory consultee, we assist planning authorities in the preparation of a sustainable local plan on the basis of capacity within our water and water recycling (formerly referred to as wastewater) infrastructure. Consequently, any infrastructure needs identified in this report must only be considered in

the context of up to date, adopted or emerging local plans. Where local plans are absent, silent or out of date these needs should be considered against the definition of sustainability set out in the NPPF as a whole.

No liability whatsoever including liability for negligence is accepted by Anglian Water Services Limited for any error or inaccuracy or omission including the failure to accurately record or record at all, the location of any water main, discharge pipe, sewer, or drain or disposal main or any item of apparatus.

Appendix 8: Gladman Housing Supply Assessment

Suffolk Coastal District Council - Five Year Housing Land Supply Assessment

This Assessment utilises information from SCDCs Five Year Housing Land Supply Assessment as at March 2015. Gladman has utilised the information within this document to review and reassess SCDCs five year supply.

Housing Requirement

The Council identifies the five year housing land requirement as set out below:

Table 1 – Identifying a 5-year + 5% housing requirement

a	SCDC Core Strategy requirements 2010-2027 (465 p.a)	7900
b	Actual net dwelling completions 2010-2015	1,452
b2	Estimated completions 2015/16 (340 +112)	452
c	Total completions 2010-2015 (b+b2)	1,904
d	Residual requirement 2016-2027 (a-c)	5,996
e	Revised Average annual rate 2016-2027 (d/11)	545
f	x5 to give 5-year supply target (ex5)	2,725
g	5% buffer (percentage of 2,725)	136
h	Total 5-year supply requirement (f+g)	2,861 (572 p.a)

(Figures rounded) Monitoring year – 1st April to 31st March the following year

Gladman believe that a 20% buffer should be applied, rather than the 5% buffer outline above. This spreads undersupply over the plan period, using the Liverpool approach. Gladman believe that SCDC should be using the Sedgfield approach, spreading the backlog over a five year period. This equates to an additional requirement of 886 dpa. This then follows:

a	SCDC Core Strategy Requirements 2010-27 (465dpa)	7,900
b	SCDC Five year Requirement (465x5)	2,790
c	Net completions 2010-15	1,452
c2	Estimated completions 2015/16 (430+112)	452
d2	Total Completions 2010-15 (c+c2)	1,904
e	Shortfall 2010-16 (b-d2)	886
f	Total five year Requirement (b+e)	3,676
g	20% buffer (percentage of 3,676)	735
h	Total 5- year supply requirement (f+g)	4,411 (882 dpa)

Housing Supply

SCDC outline the supply as follows:

Table 4 Summary table of sources of deliverable supply 2016 - 2021.

	2016/17	2017/18	2018/19	2019/20	2020/21
Remaining allocation	-	25	25	25	
Sites with planning permission 5 or more units	499	383	178	58	44
Sites where principle of development accepted	89	206	393	380	379
Sites with planning permission < 5 units	154	76	14	-	-
Sub Totals	742	690	610	463	423
TOTAL SUPPLY					2,928

The supply calculations include '*Sites where principle of development accepted*'. In this case, a number of these do not have planning permission, and as such are just sites that SCDC has included following an assessment through the SHLAA. In addition, a number of large scale applications included have unrealistic lead times, for example Adastral Park, which had a planning application submitted in 2009 and still awaits a decision. This site is also heavily reliant on large scale infrastructure. If these are removed from the supply, this removes 480 units (sites removed are highlighted in the following pages).

$$2,928 - 480 = 2,448$$

We can then include a 10% discount rate (which has not been applied by SCDC):

$$2,448 - 10\% = 2,203$$

Five Year Assessment

The Council claim the following:

Table 5 - Housing Land Supply Assessment 2016 - 2021

Housing requirement	No of units
5 year + 5% calculated requirement (see Table 1)	2,861
Annual requirement over 5 yr. period (2,861 / 5)	572
Estimated deliverable housing land supply 2015 – 2020 (Table 4)	2,928
Estimated over delivery (2,928 – 2,861)	67
Housing Land Supply Assessment 2015 – 2020 2,928 / 572)	5.12 years

Gladman calculate the five year requirement as follows:

5 Year Requirement plus 20% buffer	4,411
Annual Requirement over 5 year period	882
Estimated Deliverable Land Supply	2,203
Housing Land Supply 2015-2020 (2,203/882)	2.4 years

Appendix 9: Policy Compliance Table

Policy Conformity Table

Introduction

The tables within this appendix outline compliance with relevant detailed policy matters contained within the adopted Development Plan.

Suffolk Coastal Core Strategy & Development Management Policies

Policy	Comment	Compliance?
Strategic Policies SP1 – Sustainability Development	<p>Policy SP1 outlines the importance of the delivery of sustainable development, and the strategy which Suffolk Coastal will employ to ensure that the development that is delivered is sustainable.</p> <p>The proposed development is compliant with the strategy to development, as the development fulfils all three strands of sustainable development, as identified within the planning statement and the socio-economic report which supports the application.</p>	✓
Policy SP1A – Presumption in Favour of Sustainable development	<p>Policy SP1A states that the Council will proactively work with applicants to ensure the sustainability of development, and where appropriate apply the presumption of sustainable development in accordance with NPPF.</p> <p>The policy states that the development plan will always be the starting point for determining an application, however where there is not an appropriate policy, or the policy is out of date the impacts of the development will be balanced against the benefits in accordance with the NPPF.</p> <p>The Planning Statement outlines the accordance with the development plan policies, and assesses the benefits of the development against the impacts. The conclusion from the planning balance assessment has been that the benefits of the provision of housing clearly outweighs the harm.</p>	✓
Strategic Policy SP2 – Housing Numbers and Distribution	<p>Policy SP2 states that 7,900 new homes across the district between 2010 -2027, of which will be distributed in accordance with the settlement hierarchy (SP19). The provision of housing will be done by allocation of housing sites, and through windfalls. The policy states that an early review of the housing numbers and the Objectively Assessed Need will be published in an issues and options report by 2015.</p> <p>The development broadly complies with policy SP2, given that the site will deliver up to 215 dwelling in Woodbridge which has been allocated as a tier 2 settlement. Given that the housing figures are not based upon an up-to-date objectively assessed need, limited weight should be given to the policy.</p>	✓
Strategic Policy SP3 – New Homes	<p>Policy SP3 outlines the Council's strategy to increase the stock of housing and provide a mix of housing to enable younger people to remain within the district.</p>	✓

	The proposal will aim to provide up to 215 dwellings, within a sustainable location, which will provide a mix of housing.	
Strategic Policy SP9 – Retail Centres	<p>Policy SP9 states that there will be an emphasis on maintaining and enhancing the viability of town centres. Woodbridge has been identified as a Town Centre.</p> <p>The application proposes a 400 sqm convenience store, a sequential assessment has been undertaken in relation to the provision of the convenience store, the conclusion of which was there is no sequentially preferable sites on the edge of Woodbridge or within the Town Centre.</p>	
Strategic Policy SP10 – A14 & A12	<p>Policy SP10 outlines the importance of movement along the A14 and A12. The A12 is located to the north of the site. The policy states that developer contributions may be required to improve junctions of the A12.</p> <p>A transport assessment has been submitted with the application which undertakes a detailed assessment of the junctions which would have a potential impact. The adoption of the CIL accounts for any needed contributions towards highways improvements.</p>	✓
Strategic Policy SP11 – Accessibility	<p>Policy SP11 states outlines the Council's strategy to improve the public transport network, and reducing the reliance on the private car. The policy states that the developers must seek to maximise the opportunities for local journeys to be made by public transport.</p> <p>The proposal seeks to provide improvements to the footpaths which link to the bus stop on Ipswich Road. A Transport Assessment and Travel Plan has been submitted with the application which demonstrate the good links to the bus service and train station.</p>	✓
Strategic Policy SP12 – Climate Change	<p>SP12 states that the Council will seek to reduce the effects of new developments on Climate Change.</p> <p>The proposal is in accordance with this, however many of the aspect with the exception of flood risk will be detailed at reserved matters stage.</p>	✓
Strategic Policy SP14 – Biodiversity and Geodiversity	<p>Policy SP14 outlines that the Council will aim to protect and enhance the designated sites, and protected species.</p> <p>The ecology report submitted with the application outlines that there will be limited impact upon designated sites and species give mitigation. The application where possible seeks to enhance the habitats of protected species, and wildlife corridors.</p>	✓
Strategic Policy SP15 – Landscape and Townscape	<p>Policy SP15 outlines that the Council will aim to protect landscape character areas, and the historical and architectural value of the towns and villages.</p> <p>The application would does not have an impact upon any designated landscape character areas. The proposal has considered the impact upon designated heritage assets, and given the mitigation</p>	

	on site to reduce the impact on the Listed Building and the Heritage assessment submitted with the application concludes that there will be limited on Heritage Assets.	
Strategic Policy SP16 – Sport and Play	Policy SP16 states that appropriate provision of formal and informal sport and recreation facilities should be provided to support the community. Open space should be provided in accordance with national standards. The application seeks to provide 4.87ha of open space on site including a Children's play space.	✓
Strategic Policy SP17 – Green Space	Policy SP17 outlines that the Council will seek well managed Green Space to be provided as part of any new development. The development provides 4.87ha of open space on site.	✓
Strategic Policy SP18 – Infrastructure	Policy SP18 states that development which require infrastructure to deliver the new development, must be provided at the required stage of development. The recent adoption of the CIL accounts for the delivery of infrastructure, therefore the development is within accordance with the policy.	✓
Strategic Policy SP19 – Settlement Policy	Policy SP19 identifies Woodbridge, Melton and Martlesham as a Town (a tier 2 settlement), which has been identified to accommodate 19% of the overall housing growth. The application accords with the spatial strategy of the policy SP19.	✓
Strategic Policy SP26 – Woodbridge	Policy SP26 outlines the strategy for development in Woodbridge, it is acknowledged that Woodbridge is highly constrained and a balance upon the impacts of on the constraints is needed to ensure that Woodbridge maintains its role as a principal market town within the District. This is further discussed within the planning statement and within the planning balance the site is seen to have limited impact upon the constraints of Woodbridge and the benefits of the development would help to improve the viability of the Town and help maintain Woodbridge's role as a principal town.	✓
Development Management Policy DM2 – Affordable Housing on Residential Sites	Policy DM2 outlines that new residential development should provide 1 in 3 units to be affordable. The proposal accords with the policy and proposes to provide 33% affordable housing.	✓
Development Management Policy DM19 – Parking Standards	Policy DM19 outlines that new development should comply with the parking standards set out within the supplementary planning document. The parking standards have been considered, however the details of the parking will be agreed at reserved matters stage.	✓
Development Management Policy DM20 – Travel Plans	Policy DM20 states that new development that would have implications on transport, should be supported by a 'green travel plan'.	✓

	A Travel Plan has been submitted as part of the application.	
Development Management Policy DM27 – Biodiversity and Geodiversity	<p>Policy DM27 states that all developments should seek to protect biodiversity and geodiversity, maximise the opportunities to enhance connections of natural habitats, incorporate beneficial conservation features.</p> <p>The proposed development seeks to protect and enhance habitats onsite, the impact on designated sites have assess, and mitigation has been provided to reduce any potential impacts.</p>	✓
Development Management Policy DM28 – Flood Risk	<p>Policy DM28 states that housing developments outside the development limits will not be permitted if located within Flood Zone 2 and 3.</p> <p>The application site is wholly located within Flood Zone 1.</p>	✓

‘Saved Policies’ of the Suffolk Coastal Local Plan

Policy	Comment	Compliance?
AP28 – Areas Protected from Development	<p>Policy AP28 states that development will not be permitted within these areas, if development would materially detract from the character and appearance of the area.</p> <p>The site is designated as an area protected from development on the proposals map, to maintain the gap between Woodbridge and Martlesham.</p> <p>The application is contrary to this policy, given the proposed development. However, it is considered that the site does not function as the policy suggest given that the gap between Woodbridge and Martlesham is clearly defined by the train line.</p> <p>Further to this as given that Suffolk Coastal District Council cannot demonstrate a five year supply of housing the policy must be considered out-of-date as it restricts the delivery of housing.</p>	
AP56 – Town Centre	<p>Policy AP56 identified Woodbridge as a town centre. The policy outlines a number of uses which have a preferred location within the town centre, unless there is an over ridding material consideration.</p> <p>The application proposing a 400sqm convenience store within the site, this has been supported by a sequential test which addresses this policy.</p>	
AP212 – Ipswich Fringe – Open Character of land between	Policy AP212 states that the District Council will seek to maintain the open character between villages on the Ipswich Easter Fringe. This includes between Martlesham and Woodbridge.	

settlements	The proposal site does reduce the gap between Woodbridge and Martlesham however, the open character between the two settlements is only felt beyond the train line. The train line defines the character between Woodbridge and Martlesham.	
AP214 – Ipswich Road/ Sandy Lane, Martlesham	<p>Policy A214 identifies the land between Ipswich Road (A12) and Sandy lane as being an important component to the Fynn Valley, lying between the Special Landscape Area and the AONB. The District encourages enhancement of this area.</p> <p>The proposal is contrary to this policy given that the site is the land identified. However the policy should be given limited weight in line with paragraph 215 of the Framework, due to the policies consistency with the Framework.</p> <p>In addition, to the lack of a housing land supply the District has an identified need for housing. Given that Woodbridge is constraint by a number of National and International designations, this is, one of the only suitable housing sites not to be affected by a designations.</p>	
AP236 – Woodbridge and Melton: Restraint	<p>Policy A236 restricts the delivery of new housing to small scale developments, within the physical limits of Woodbridge as defined on the proposal maps.</p> <p>Given that the physical limits are based the structure plan, and therefore should be considered out of date. In addition, the LPA cannot demonstrate a five year supply of housing therefore the housing policy cannot be considered up to date.</p>	
AP240 – Woodbridge and Melton: Development to the West of A12	<p>Policy AP240 states that the A12 creates a physical boundary to Woodbridge and development will not be permitted to the West of the A12.</p> <p>The application is located to the east of the A12 and is within the A12 boundary. Given this the application site is compliant with this policy.</p>	✓

Appendix 10: Correspondence with Housing Officer

Megan Farmer

From: Julie Griffiths <Julie.Griffiths@eastsuffolk.gov.uk>
Sent: 09 July 2014 17:03
To: Megan Farmer
Cc: 'Martin Aust'; 'Jenny Mayne'
Subject: RE: proposed development at Woodbridge - Affordable housing research

Please see response below

Thanks
Julie

From: Megan Farmer [mailto:M.Farmer@gladman.co.uk]
Sent: 24 June 2014 16:45
To: Julie Griffiths
Subject: proposed development at Woodbridge - Affordable housing research



Dear Julie

Proposed development at Woodbridge, Suffolk Coastal District Council

I am writing to you as Gladman Developments Ltd are considering a new residential development on the land set out above.

At this stage the application is in its infancy, and as part of the background research for this proposal, I would be most grateful if you would provide the following information;

- How many household are in need of affordable housing across the district? **We have 2982 on our register however only 696 are in priority need categories**
- How many households are registered on the Council's register for affordable housing with a preference for Woodbridge? **389**
- How many of these households are in significant need? **82**
- How many of these households have a current local connection to the area (i.e are living within the parish)? **Potentially all – they have all ticked that they have a local connection to Woodbridge**

- How is the need for affordable housing spilt for different types tenures over the whole district? And how is the need spilt for different tenures in Woodbridge? **The Local Plan refers to 75% affordable rented and 25% intermediate tenure. This would be the same for Woodbridge. However, as things stand at present we would prefer all to be for affordable rent.**

Kind Regards

Megan Farmer

[Megan Farmer](#) - Graduate Planner | m.farmer@gladman.co.uk | DDI: 01260 288 867 | www.gladman.co.uk

Gladman Developments | Gladman House | Alexandria Way | Congleton | Cheshire |
T: 01260 288800 | F: 01260 288801
www.gladman.co.uk

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Appendix 11: Correspondence with Minerals Officer

Megan Farmer

From: Irina Davis <irina.davis@suffolk.gov.uk>
Sent: 20 October 2015 14:21
To: Helen Ball
Cc: James Cutting
Subject: RE: Land off Dukes Park, Woodbridge

Dear Helen,

After careful review of the proposals plan, site constraints and its viability for mineral extraction, the County Council can confirm that it is unlikely that any sand or gravel which may be present on site is unlikely to justify extraction as required in Policy 5 of the Minerals Plan. Therefore, having had a more detailed consideration of the site, the full assessment is not required in this specific case.

Kind regards,

Irina Davis
BSc (Hons) AEMA
Planning Officer (Sustainability Appraisal)
Resources Directorate
Strategic Development Division
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Tel: 01473 264208
Fax: 01473 216915
Email: irina.davis@suffolk.gov.uk

For more information about our Minerals and Waste Planning Service go to <http://www.suffolk.gov.uk/environment-and-transport/planning-and-buildings/>

From: Helen Ball [mailto:H.Ball@gladman.co.uk]
Sent: 20 October 2015 11:56
To: Irina Davis
Cc: Emma Tutton; Megan Farmer
Subject: Land off Dukes Park, Woodbridge



Dear Irina

As discussed, you previously responded to Suffolk Coastal District Council earlier last year in relation to a scoping request for the above site. I have attached a copy of your response specifically in relation to minerals.

You have suggested that the proposed site falls within a Mineral Consultation Zone and that further work to establish the economic value and viability of the mineral in this area needs to be undertaken.

We have taken a Look at the Minerals Core Strategy Proposals Map and it looks as though it is only the very southern tip of the proposed site that falls within this zone (see extract from the proposals plan below, with the site starred for ease of reference, and attached proposed development location plan).

Given that a very minimal proportion of the site is included within the consultation zone and the constraints that this part of the site would have, including the railway and existing business uses etc, it is unlikely that it would be both realistic or viable for mineral extraction. Furthermore, the majority of the proposed development would not sterilise or seriously hinder the extraction of mineral deposits of economic value which are capable of being worked.

Please could you confirm, or otherwise, whether we will be required to undertake a full assessment, as required in Policy 5 of the Minerals Plan, given the above points?

Kind regards

Helen



Helen Ball - Planning Manager | h.ball@gladman.co.uk | DDI: 01260 288 847 | M: 07507 662 230

Gladman Developments | Gladman House | Alexandria Way | Congleton | Cheshire | CW12 1LB

T: 01260 288 800 | F: 01260 288 801

www.gladman.co.uk/land

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Appendix 12: Correspondence with EAOW

Sarah Kennard
Utilities Consultant
Gladman House
Alexandria Way
Congleton
Business Park
Cheshire
CW12 1LB

24th July 2014

East Anglia ONE Offshore Windfarm

Dear Sarah,

Further to an email exchange with our agents, Savills, and our telephone conversation please find below a response to your general queries. Following receipt of this correspondence EAOL strongly recommend that we arrange a face to face meeting to discuss the interaction between your application and the East Anglia ONE Offshore Windfarm cable route.

Easement width and cable location

East Anglia ONE Limited (EAOL) has consent for a 37km cable route running from our landfall location in Bawdsey to a converter station site in Bramford. The consented cable corridor width is 75m wide with a permitted permanent width of 55m, a deviation of 20m has been retained in order to route the cable in the most appropriate way through the corridor.

As you have noted our Heads of Terms agreement with AM, TW & W Johnson and R Keen state a maximum width of 30m or less for the easement(s). The width of 160m that you have referenced from consultation boards will be from an earlier phase in the project prior to defining the final route. There are areas of the cable route where the width will extend to 160m but these are to address sensitive areas for horizontal direction drilling and would not apply to this section of the route.

At this stage we do not have an exact position of where the underground cable route will be located, however through consultation with Gladman we would envisage a mutually acceptable layout can be agreed. To date we have confirmed that the cable 'will be as near to the railway line as reasonably possible or along such other route as may be agreed between the parties.' EAOL believe the involvement of Gladman is a key element of the final routing in this area and will enable this by providing as much detail as is reasonably possible.

Future projects

For clarity, the project has consent to install underground cables for East Anglia ONE Limited and has also been provided consent to lay ducts for the future project East Anglia THREE and FOUR which will also connect to the electrical infrastructure at Bramford. The future projects will return to the route to undertake a 'pull through' process using the pre-installed ducts. I have attached a figure 'Diagram 2-5' to this correspondence that shows the indicative layout of the ducts with the East Anglia ONE cables.

East Anglia Offshore Wind Limited, 3rd Floor, 1 Tudor Street, London, EC4Y 0AH
Telephone 020 xxx xxx
www.eastangliawind.com

East Anglia Offshore Wind Limited

Registered Office: 3rd Floor, 1 Tudor Street, London, EC4Y 0AH.. Registered in England and Wales No. 06990367. VAT number GB 997 3408 67

Programme

The onshore construction works for East Anglia ONE would commence in 2017 and spread over a period of two years. At this stage we could not confirm when construction would take place at this part of the route, this information would be determined after appointment of a contractor to undertake the works.

Existing infrastructure

In relation to your queries about existing infrastructure in or around the site I refer to the relevant sections of the EAOL Development Consent Order where protective provisions with the relevant parties have been stipulated. The provisions would form the basis of an agreement with existing infrastructure on the site following discussions with the affected parties. These can be found under Schedule 9 of the Development Consent Order.

Best wishes

Victoria Smith

Assistant Project Manager

East Anglia Offshore Wind
Offshore Development
4th Floor Atlantic Quay
Glasgow
G2 8JB

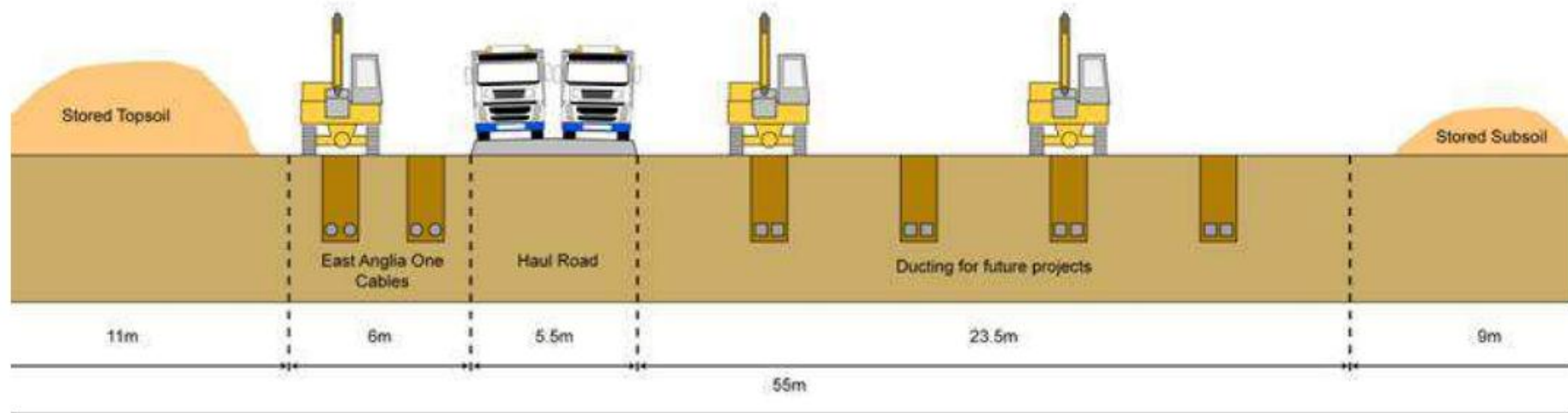


Diagram 2-5 Schematic Showing Activities within the Onshore Cable Route Working Width

Appendix 13: Sustainability Matrix

Gladman Sustainability Matrix – Land off Duke’s Park, Woodbridge

Sustainability Strand	Sustainability Criterion	Factor	Sustainability Outcome	Commentary	Document Reference
Social	1 Primary Check List	Will the site contribute to a shortfall in the 5-year housing land supply?	✓	The site will provide 215 dwellings within the five year supply.	See Committee Report
		the site is: Available	✓	Yes	See Planning Statement
		the site is: Suitable	✓	Yes	See Planning Statement
		the site is: Achievable	✓	Yes	See Planning Statement
		Does the scheme accord with delivery of the Council's Spatial Strategy?	✓	Woodbridge is defined as a tier 2 settlement. Which has been identified to delivery housing growth.	See Planning Statement
	2 Housing	Does the provision of Affordable Housing contribute to the local affordable housing shortfall	✓	The proposed development will provide up to 33% (a third) affordable housing on site.	See Affordable Housing Statement
		<i>Diversity of housing stock:</i> <ul style="list-style-type: none">flexibility within homes to enable home-workingLifetime Homes standard in social housing	✓	Proposal promotes the highest quality sustainable design, creating a 'place' which is both safe and attractive and which enhances quality of life, health and social well-being, supporting 'building for life' and 'lifetime homes'.	See Design & Access Statement
		Meet Local Housing needs, maintain land supply and reduce waiting lists by providing a range of types, sizes and tenures of market housing based on local socio-economic demographics.	✓	Proposal provides a choice of housing size and tenure in order to help create a mixed community, including provision of affordable housing.	See Affordable Housing Statement
	3 Quality of life, Education, Community	Facilitates safe routes to schools	✓	The development proposes to improve the footpath provision along Ipswich Road to ensure a safe pedestrian route to Primary School.	
		Creates a balanced community by increasing affordability and introducing a younger demographic of working age population.	✓	The development will provide up to 215 family homes.	
	4 Sustainable Settlement and Location	Is the site adjoining a recognised Sustainable Settlement or Location for Growth in LPA Policy?	✓	Woodbridge has been identified as a 'Town' in the Suffolk Coastal Core Strategy, which is a tier 2 settlement. Woodbridge contains a good level of services, within the town including shops, health care facilities and schools. Woodbridge also has good public transport links.	See Planning Statement
		<i>What makes this location sustainable?</i> Accessibility to 'local and neighbourhood' facilities within or just beyond the 800m walking distance.- maximum acceptable walking distance (IHT)		Amenity Area 1298m to Old Barack Road Early Years Care Provision 751m to Bridge Day Nursery Food shop 1298m to Coop Food. Primary school 1152m km to Kyson Primary School Bus Stop 543 m to Ashton House Bus stop Pub 584 m to The Duke of York Pub Sports Facility 939m to Woodbridge Town Football club Pharmacy 1619 m to Waterton Pharmacy Health Centre 1619m to Framfield House Surgery	See Design and Access Statement and Transport Assessment
		<i>What makes this location sustainable?</i> Accessibility to 'district' services within or just beyond the 2,000m walking distance - maximum distance commutable for walking (IHT)		Train Station 2160m to Woodbridge train station Dentist 2424 m to The Dental Surgery Secondary School 2966m to Farlingaye High School Leisure Centre 2049m m to Deben swimming pool Library 2371m to Woodbridge Library Supermarket 2824m to Tesco, Marylesham Employment Area 2818m to Adastral Park Industrial estate Bank 2181m to Lloyds Bank Small Park 2094m to Kingston Field Post Office 2170m to Woodbridge Post office Shopping hub (5+ shops) 2140m to Woodbridge High Street ATM 2181m to Lloyds bank ATM	See Design and Access Statement and Transport Assessment

Gladman Sustainability Matrix – Land off Duke’s Park, Woodbridge

Environmental		Means of additional capacity at existing education / medical facilities provided.	✓	Primary school has capacity to accommodate the children from the proposed development. The GP Surgery are currently accepting new patients.	Statement of Community Involvement
		Existing residents benefiting from increased sustainability by provision of new facilities on-site	✓	Provision of Children's play space, publically assessable open space. Improved footpaths along Ipswich Road.	
		Development restricted to flood zone 1:- able to contain rainfall from 1 in 100 year rain events	✓	The site is located within Flood Zone 1.	See FRA
		Areas of ecological and geological interest are unaffected / mitigated by the proposals	✓	The site provides mitigation for ecology and geology, by providing a reptile strategy to ensure the protection of common lizards on site. Green infrastructure will be provided on site to enhance the biodiversity onsite.	See Ecological Report
		Development will not lead to an avoidable loss of Best and Most Versatile (BMV) agricultural soils?	✓	The site is not located within BMV.	See Soils Resources Report
		Is the site outside Green Belt, National Park, AONB or other protected landscapes?	✓	The site is not located within any protected landscape.	See LVIA and comments of the Council's Landscape Officer
		The scheme does not affect a wildlife sensitive location – SSSI, SIN, LNR?	✓	The site is located within close proximity to the Deben Estuary SPA, SSSI and Ramsar site. The proposed development will not have a significant impact upon the Deben Estuary.	See Information for HRA
	5 Sustainable Transport	All homes within 5km of long distance public transport services (railway station/bus service)	✓	Woodbridge train station is located C. 2km from the development site.	See Transport Assessment
		Development site within 800m of hourly bus service	✓	A number of good bus services run from Ipswich Road C.450m from the site.	See Transport Assessment and Travel Plan
		Indicative scheme prioritises foot and cycle access to local facilities, public transport and green space.	✓	The indicative scheme provides pedestrian and cycle links throughout the development. Improvement to the bus stops are being proposed. The development provides 38% of green space on site.	See Design & Access Statement
		Travel Plan Co-ordinator to implement Travel Plan to reduce car-reliance and enable lift sharing.	✓	A travel pack is being provided to all new residents.	See Transport Assessment and Travel Plan
	6 Design and Integration with local environment	Quality street design regulates traffic & encourages shared-use, amenity, recreation and community	✓	A pedestrian friendly environment will be provided for, pavements and shared spaces will be used to help control traffic speeds.	See Design & Access Statement
		A high quality built environment with a network of connected streets with active frontages responsive to local vernacular as reference points for design	✓	Active frontages along open space have been considered in the Framework plan.	See Design & Access Statement
		Provide multi-functional green spaces on-site achieving Local Plan and / or NPFA standards for recreation and play space, incorporating <ul style="list-style-type: none">Local landscape features,Existing vegetation / native planting schemeSUDS: swales, open watercourse, reed-beds, ponds	✓	4.87 ha of greenspace is being provided onsite. The open space includes, children's play space, amenity greenspace and footpaths. Hedgerows and trees are being retained where possible.	See Design & Access Statement
Economic (& Social)	7 Economic Benefits	Does scheme promote Planning for Growth aims?	✓	The development seeks to promote the planning for growth aims.	See Planning Statement
		Benefits to LPA: - New Homes Bonus, Council Tax, s106 contributions; Job creation, Value of works.	✓	The Local authority will potentially receive £405,400 new homes bonus and £1.62 million Council Tax. In addition the development will provide a CIL payment which will contribute to infrastructure improvements within the local area. The development will potentially create 90 FTE jobs.	See Planning Statement
		Proposal that increases the viability and reinforces the sustainability of local businesses and facilities.	✓	The development will have a potential population of 516. The increase population will provide additional customers, and therefore increasing the viability of local businesses and facilities.	See Planning Statement
	8	"... approving development proposals that accord with the development plan without delay;"	✓	It has been demonstrated that the proposals are in broad compliance with the overall objectives of national planning policy.	Planning Statement

Gladman Sustainability Matrix – Land off Duke’s Park, Woodbridge

	NPPF: Para 14: “At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking... For decision-taking this means (unless material considerations indicate otherwise)...”	“and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:”	✓	The Core Strategy was adopted in 2013, subject to the housing numbers being reviewed in 2015. This review has not been completed and therefore to the housing policies should be considered out-of-date.	Planning Statement
		“ –any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;”	✓	There are a number of significant benefits associated with the development, including; public open space, increased affordable housing provision for the District.	Planning Statement
		“or specific policies in this Framework indicate development should be restricted (SSSI, Green Belt, AONB etc.).”	✓	This site is not intersected by any policies which indicate that development should be restricted.	Planning Statement

Appendix 14: Planning Balance Table

Woodbridge– Material Planning Benefits and Negative Factors

Purpose

The purpose of this supplementary document is to encapsulate the relevant material considerations, and demonstrate in the planning balance that the benefits demonstrably outweigh the negative factors of the proposal.

Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations. The document will show that the proposal strongly accords with the three dimensions of sustainable development; economic, social and environmental.

Economic

Material Consideration	Description	Positive benefit, Neutral, or Negative Factor
New Jobs	<p>The estimated build cost for the scheme is in the region of £25.1 million. This will support around 90 construction jobs (full time equivalent) during the construction period. In addition to 20 jobs in associated industries.</p> <p>The retail units will provide 15 jobs on-site within the convenience store.</p> <p>There are currently around 50 people in Suffolk Coastal District Council (September 2015) claiming Job Seekers Allowance and are seeking employment in construction and building trades. The proposed development would lessen the issues of unemployment in construction.</p>	Positive benefit
Labour Force/ demography	<p>The proposed development would accommodate around 516 residents, with a large number (around 380) likely to be of working age and around 290-330 residents likely to be in employment. The scheme will therefore directly contribute to ensuring the availability of a local labour force and would be of direct benefit to local businesses.</p> <p>The increase in population would also generate additional demand and support for local education and health services such as GPs, dentists, nurseries, schools and colleges. The increase in population will support jobs in a range of services in both the public and private sectors.</p>	Positive benefit
Resident Expenditure	<p>Residents of the proposed development would generate annual household expenditure of £0.7 million per annum in Woodbridge and £1.2 million in total across the district. This expenditure would support around 15 full-time equivalent jobs.</p> <p>Household moves generated by the development would bring some benefits to the local economy</p>	Positive benefit

	through expenditure with local firms on services such as estate agents and conveyancers, as well as on new fixtures and fittings.	
New Homes Bonus	Suffolk Coastal District Council would receive an estimated total of £405,400 in New Homes Bonus (NHB), with the last payment of the NHB monies occurring six years after completion and registration for Council Tax purposes of the final property.	Positive benefit
Vitality & Viability	The additional residents of 215 households will increase demand for, and use of local services and businesses within Woodbridge and the surrounding area. This increased demand and spending will help to maintain and enhance the services available and accessible within the village and increase their viability.	Positive benefit
Council Tax Revenues	The Council will also receive Council Tax payments of approximately £1.62 million over 6 years. This provides an important source of revenue funding for the local authority in delivering services as well as investing in the locality.	Positive benefit
Ageing Population	By providing a range of family housing, especially three and four bed homes, the proposed development is expected to attract families. This will help to respond to the challenges of an ageing population such as reduced local spend and increased pressure on local services and the labour market.	Positive benefit
Economic Recovery	Delivery of this site will assist economic recovery more quickly than Sustainable urban extensions.	Positive benefit

Social

Material Consideration	Description	Positive benefit, Neutral, or Negative Factor
Building Sustainable Communities	<p>The proposals will assist in building and maintaining a mixed and balanced community that will help sustain the vitality of community life in Woodbridge.</p> <p>Woodbridge is classified as a main town in the adopted Suffolk Coastal Core Strategy. The development of up to 215 new homes allows the settlement to play its part in delivering sustainable development in the area as proposed in National Planning Practice Guidance (Reference ID: 50-001-20140306).</p>	Positive benefit

Housing Need (Market & Affordable)	<p>The development of the proposed housing is a very efficient way of meeting existing housing need quickly. The site is easy to develop and has very few constraints, which will ensure that the site will rapidly contribute to increasing the supply of housing within the district.</p> <p>The proposals meet an identified Housing Need for people in both the market and affordable housing sectors which will “ensure choice and competition in the market for land” (NPPF Paragraph 47).</p> <p>New homes in Woodbridge will enable people to access the housing market locally rather than being forced to move away due to a lack of available housing. The proposals will assist in helping to maintain and enhance to vitality of the community (NPPF Paragraph 55).</p> <p>The mix of house types to attract the economically active and improve economic competitiveness, diversify local age structure and contribute to the “objective of creating mixed and balanced communities” (NPPF Paragraph 50).</p>	Positive benefit
Design & Access (Social Dimension)	<p>The planning permission would enable delivery of a mix of housing - up to 215 new dwellings, offering 1-5 bedroom properties, comprising a range of house types from linked townhouses to detached properties. This will add to the choice of high quality homes available in the district.</p> <p>The proposal sets a framework to enable the delivery of a high quality residential development. Existing and new residents of the settlement will benefit from the additional social infrastructure provision on-site, on land where there is currently no public access.</p> <p>Strategic areas of landscape and open space will include formal recreation, a children’s play area, and footpaths. The existing vegetation along the boundaries will be reinforced with new tree and hedgerow planting, which will benefit people and wildlife alike. The amount of Public Open Space exceeds the requisite amount as specified within district guidelines.</p>	Positive benefit

	<p>The scheme will ensure a well-designed pedestrian network that links with the existing settlement. New footpath linkages to existing facilities in Woodbridge will be established.</p>	
Transport Impact	<p>The location of the site provides the opportunity for residents to undertake journeys on foot and by cycle, for a variety of purposes, including school, recreation, leisure, local amenity shopping and employment.</p> <p>Off-site infrastructure improvement, including a new footpath will provide benefit to existing residents as well as new occupiers of the proposed development.</p> <p>The proposals provide funding to achieve improvement to enhance the highway network for all users in terms of ease of movement and improving safety. Pedestrian friendly linkages for new and existing residents will enhance safety and access.</p> <p>The proposals will support the sustainability of established bus services which serves Woodbridge.</p>	Positive Benefit
	<p>There is a modest increase in traffic flows in the area but the analysis in the Transport Assessment show the increase is not material. There is ample capacity available on the road network.</p>	Neutral Factor
Travel Plan	<p>The Travel Plan (TP) promotes sustainable travel awareness and encourages sustainable travel choices other than single occupancy vehicle journeys. This Framework TP is prepared taking account of currently available best practice guidance (DfT 2009) and complementary residential guidance (DfT 2005).</p> <p>The TP will be managed and operated by the Travel Plan Coordinator (TPC) to be appointed by the residential developer(s), and to be in post at least three months prior to first occupation of a house at the site.</p> <p>As this is a new development, sustainable travel habits can be encouraged from the outset of occupation. The early appointment of the TPC will maximise this opportunity to influence travel choices.</p>	Positive benefit

Archaeology and Heritage	No designated heritage assets are present on the application site. The Archaeological assessment, submitted as part of this application states that development on site will not have any significant impact on any heritage or archaeological impact.	Neutral Factor
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Environmental

Material Consideration	Description	Positive benefit, Neutral, or Negative Factor
Landscape & Visual Impact	The proposed development would be seen in context of the existing settlement of Woodbridge. The proposal has been had a well-considered approach to Landscape and the context of the site of which would not be unacceptable in landscape and visual effects. The overall anticipated landscape and visual effect is considered to be 'moderate adverse'. The LVIA submitted alongside this application demonstrates that this would be acceptable in the context of this site on the edge of Woodbridge.	Neutral Factor
	The site will be enriched by new tree planting, the creation of new wildlife habitats and protection and enhancement of existing wildlife corridors. New landscaping will soften landscape impact over time. The proposals respond well to the local landscape character of the site, recognising and responding to opportunities to retain views, extend local public open space and improve the existing urban edge.	Positive Benefit
Flood Risk Assessment (FRA)	The surface water drainage design will attenuate water run-off to less than the existing greenfield run-off rate and take account of future climate change in accordance with National Planning Policy Guidance. This is a material environmental benefit.	Positive benefit
Health and Well Being	Residents of the new housing will benefit from the new recreational and leisure infrastructure available within the settlement, which will integrate with the existing public rights of way network and other public open space and provides greater opportunities for access to existing residents.	Minor positive

Ecological Impact	<p>Hedgerows which form the sites' boundaries are a habitat of principal importance. Hedgerows will be retained and enhanced through gapping up, with the addition of new tree planting to provide a buffer and wildlife corridor around the site.</p> <p>A pond will be created to be compatible with the Sustainable Drainage System on site so to help naturally manage run-off and add biodiversity.</p> <p>The proposal aims to conserve and enhance biodiversity through:</p> <ul style="list-style-type: none"> • Provision of domestic gardens which provide an opportunity to improve biodiversity over and above agricultural use • Significant areas of planting to provide green infrastructure, ecology and wildlife benefits, including the protection of badger setts • Habitat creation measures to ensure biodiversity is retained with enhanced hedgerows and green corridors. <p>These measures will ensure a net biodiversity gain in accordance with requirements of Paragraphs 9 and 118 of the NPPF.</p>	Positive benefit
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Planning Balance

POSITIVE BENEFITS	NEGATIVE IMPACTS OF THE SCHEME
Ecological Impact	Heritage (neural impact)
Flood Risk Assessment (FRA)	Transport impact (neural impact)
Health and Well Being	Landscape and Visual (natural impact)
Building Sustainable Communities	
Housing Need (Market & Affordable)	
Design & Access (Social Dimension)	
Transport Impact (neural impact)	
Travel Plan	
Archaeology and Heritage (neural impact)	
Landscape and Visual (neural impact)	
New Jobs	

Labour Force/ demography	
Resident Expenditure	
New Homes Bonus	
Vitality & Viability	
Household Rates	
Ageing Population	
Economic Recovery	

