



## **AGENT**

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13<sup>th</sup> March 2017

## **Town and Country Planning Act 1990**

**Proposal:** Request for EIA Scoping Opinion: Application for 2000 residential homes and associated infrastructure.

**Address:** Land To The South And East Of, Aداstral Park, Martlesham Heath, Martlesham

**Date Valid:** 15th December 2016

**Case Officer:** Ben Woolnough

**File ref:** DC/16/5277/SCO

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## **Town and Country Planning (Environmental Impact Assessment) Regulations 2011 – Suffolk Coastal District Council Scoping Opinion**

### **Land to the South and East of Aداstral Park, Martlesham Heath, Martlesham**

This Scoping Opinion is provided by Suffolk Coastal District Council (SCDC) as the relevant Local Planning Authority (LPA) in accordance with Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) ('the Regulations') in relation to the development of Land to the South and East of Aداstral Park, Martlesham ('the Site').

This Scoping Opinion is provided in response to a request submitted by Code Development Planners ('the agent') on behalf of Commercial Estates Group (CEG) ('the applicant') and registered with the LPA on 15/12/16. This EIA scoping request follows is submitted in advance of and to inform, an outline planning application for the development of the site for:

The erection of 2000 homes and associated infrastructure

Prior to this written response all scoping consultation responses were sent to you by email on 23<sup>rd</sup> January 2017. This email also included the responses received from Martlesham and Waldringfield Parish Councils and Brightwell, Foxhall and Purdis Farm Parish Council. Those responses should be taken into consideration when preparing your Environmental Statement but they have not been directly reference in this response.

By way of summary the LPA considers the proposed development to give rise to potentially significant environmental effects including the following matters:

- Air Quality
- The Historic Environment
- Ecology
- Flood Risk and Drainage
- Ground conditions and contamination
- Landscape and Visual Impacts
- Noise
- Socio Economic effects
- Transport and Travel Planning

The remainder of this Scoping Opinion provides the LPA's reasoning for why these matters should be considered within the EIA and the methodology for the Assessment. This response is informed by the responses of Statutory and Non-Statutory Consultees. In some cases the comments received go beyond that which would be expected to be included within the Environmental Statement but they might be useful in developing your proposals. The Local Planning Authority considers that the Scoping Report would be appropriate as the basis for an Environmental Statement.

### **Proposed Development**

The LPA understands that any planning application as and when made will be submitted in outline form with only the points of access into the site submitted for approval. The scale, layout, landscaping, and appearance of the development will be reserved for later reserved matters approvals.

Where a scheme is proposed in outline form (such is the case here) it is important that the LPA is provided with sufficient information on the nature of the proposed development to allow for a robust assessment of the potential environmental effects to be carried out.

The location of land uses, density and heights of development within the site should be set by maximum or worst case scenario parameters within the Environmental Statement.

This scoping response addresses the relevant topics in the same order as the RSK Scoping Report (December 2016).

## Environmental Statement Topics

### AIR QUALITY

The scoping report refers to Ipswich Borough Council's Air Quality Management Areas (AQMAs) and states that the EHO's at IBC will be consulted further. As the site in fact lies within the Suffolk Coastal District Council boundary, it is of concern that no reference or consideration has been made to air quality in the Suffolk Coastal District and specifically the declared AQMA in Woodbridge which is approximately 5.5 km from the application site. The EHO's at Suffolk Coastal would expect to be consulted to confirm the scope of the assessment and the methodology that will be used within the EIA process prior to the submission of the application.

Air quality monitoring for nitrogen dioxide is undertaken by Suffolk Coastal District Council along the A12 in the vicinity of the application site and also at other nearby sites on relevant sections of the road network. This data is all available on our website at <http://www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/> and this should be referenced in the ES. This will need to be addressed in the detailed EIA and reference made to the to the EPUK/IAQM Guidance: Land-Use Planning & Development Control: Planning For Air Quality, in particular Chapter 6 which gives guidance on what should be included in an air quality assessment. Essentially, but not exclusively, we would expect to see the following:

- Air quality modelling predictions both with and without the development in place - should this indicate any areas predicted to be close to the AQ Objectives then additional detailed dispersion modelling would be required. The use of ADMS Roads (referenced in the EIA scoping report) would satisfy both requirements.
- Impact of traffic from the operational phase on local residential receptors –particularly in Woodbridge Town Centre and the A1214 through Kesgrave and particularly the junction with Bell Lane. We would expect to see reference to predicted impacts on the AQMA in Woodbridge in addition to the local road network.
- Suitability of the site for residential development - impact of local air quality on the new houses.
- Assessment of the air quality impacts from the demolition / construction phase on local receptors, together with control and mitigation.
- Reference to sustainability policies set out by Suffolk Coastal District Council (SCDC) and any other relevant policies set out by SCDC.
- Any mitigation options that could be introduced for the development in order to offset emissions – for example electric charging points (or the infrastructure to install them in the future), provision of public transport information to residents, low NOx boilers etc.

Natural England have responded to the scoping consultation with advice relating to the relationship of air quality with biodiversity. The state that 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](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## HISTORIC ENVIRONMENT

This section of the Scoping Report separates the historic environment into below ground and above ground archaeology. Concern has been raised by Historic England and SCDC's Principal Design and Conservation Officer regarding this approach. The site includes below ground archaeology, Scheduled Monuments and Non-Designated Heritage Assets. There are crossovers between the below and above ground archaeology where a coherent narrative would better assess the effects of development. Furthermore the Non-Designated Heritage Assets could not be described as above ground archaeology. A more comprehensive approach titled Historic Environment could avoid isolating the various heritage/archaeologic considerations.

### Principal Design and Conservation Officer

- Section 7 Above Ground Archaeology, p20 – the title of this section is surely erroneous as it encompasses historic buildings and the historic built environment, which I would never refer to as 'archaeology'. I suggest that this section is re-titled.
- Table 7.1, p21 omits reference to two key paragraphs of the NPPF: paragraph 135, which refers to Non Designated Heritage Assets; and paragraph 139, which refers to Non Designated Heritage Assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments - as may be the case here.
- Para. 7.2.5, p22 – Our adopted and published Criteria for the Identification of Non Designated Heritage Assets that are Buildings should be included on this list.
- Paras. 7.3.7-8, p23 – I need to ask how these Non Designated Heritage Assets were identified. It would be most helpful if our adopted criteria were employed here; if not, we will apply these to those heritage assets identified here, in due course.
- Para. 7.3.10, p24 – presumably what is meant here is that no other Non Designated Heritage Assets were identified other than those referred to above at paragraphs 7.3.7 and 7.3.8. Are they certain that there are no other NDHAs within the study area that could be identified using our criteria?
- Para. 7.4.2, p24 - At Ravenswood in Ipswich, a pillbox has been incorporated as an urban design feature into the layout.
  
- Para. 7.4.7, p25 – this does seem a rather sweeping statement to include here, presumably evidenced on extant analysis? If not, it would not be appropriate to include here. Also, the reference here should be only to 'heritage assets' rather than 'cultural heritage assets', which category I do not recognise.
- (First) Heritage Asset Map, following p26, key – under Non-designated Heritage Assets, the correct spelling is Nissen Hut (Nissan make cars).
- (Second) Heritage Asset Map – what is the purpose of this map? It appears to be very selective in its illustration of some designated heritage assets somewhere nearby outside the application site. Why and for what purpose? These two ME maps also need proper titling.
- Para. 11.2.3, p43 –the Suffolk Design Guide is a long-defunct and outdated document.
- Para. 11.3.6, p45 - the BT tower is called Pegasus tower and I judge it a significant local landmark.

## Historic England

This development area lies within a wider historic landscape containing a number of highly important designated and non-designated heritage assets. This consists of a number of Scheduled Monuments (SM), primarily prehistoric bowl barrows which form part of an important and extensive prehistoric landscape. This wider landscape also contains a number of listed buildings, which along with the barrows have been identified in the baseline survey for the RSK report. We are also aware of a potentially significant quantity of non-designated heritage assets within the area, including other prehistoric barrows and multi-period settlement evidence.

There is also a significant interest in the amount of WW II and post-war heritage across the site, and we understand that the development area would include at least part of the former RAF Martlesham, including the land that formed the runway. Other war time buildings and structures from the airfield have been located (as noted in chapter 7 of this report) as well as designated and un-designated defensive structures. The archaeological analysis for the Environmental Statement (ES), as well as considering the significance of individual heritage assets would also need to consider the landscape context of the designated and undesignated assets, in particular the prehistoric landscape of barrows and settlement, the medieval landscape of acid heath and dispersed settlement and the WWII and post-war military landscape, which also contributed to the development of the British Telecom research station.

We acknowledge that Archaeology is noted in the EIA Report (see chapters 6 and 7) and will be included in the scope of the assessment for further analysis. The report also provides reference to previous scoping reports which relate to previous planning activities the latest of which appears to have been in 2009. At this stage we are unclear as to what advice relates to which application and therefore it would in our view be appropriate to illustrate this through a Desk Based Assessment which would underpin the ES. Heritage assets, historic landscapes, quarrying and previous planning applications could all be illustrated. The Planning Authority and their archaeological advisors would need to be convinced that a thorough assessment of the historic environment has been undertaken in order to meet the requirement of paragraph 128 of the National Planning and Policy Framework. The DBA and the historic environment section of the ES therefore need to be fit for purpose, suitably detailed and completed by a suitably qualified historic environment specialist.

In relation to the production of the ES document, Historic England has consistently raised concerns about the generic approach to determining significance, magnitude of impacts and sensitivity in documents of this type. We are concerned that this formulaic approach does not always deliver a coherent and informed narrative of harm in relation to the policy tests established in the NPPF. This approach is again proposed in this application (see Tables 6.3, 6.4, and 6.5) and it is worth noting that whilst the standardised EIA matrices are a useful tool, we consider the analysis of impact, harm, significance and setting as a matter of qualitative and expert judgment which cannot be achieved solely by use of matrices or scoring systems. Historic England therefore recommends that the applicant does not rely upon this methodology alone, and that these tables should be seen primarily as supporting material. The applicant instead should seek to deliver a clearly expressed, iterative and non-technical narrative based approach to determining significance and harm, which is tailored to this specific scenario.

We would also want to see the integration of the historic environment sections with other relevant sections through the ES text as recommended in our guidance on the setting of heritage assets. This is most relevant to the Landscape and Visual Assessment (see chapter 11), where we consider that it would be critical to integrate the historic environment receptor in to the assessment process. We also recommend photomontages and/or wirescape images from heritage specific viewpoints are provided. These would need to be from the key designated heritage assets, but would also need to include wider views of assets, and those viewpoints that seek to illustrate cumulative impacts. It should be noted that any assessment should include analysis of the surrounding countryside and the

nature of this landscape. The assessment of 'setting' likewise should not be solely be restricted to visual impact, and would need to consider the impact from other environmental factors such as noise, traffic and lighting.

We are concerned by the apparent lack of understanding in relation to setting expressed in this report (see 7.4) and in particular take exception to the statement in 7.4.7. We would like it to be recognised that screening can in itself be harmful to the setting of a designated heritage asset where it detracts from assets significance. Inappropriate screening can cause harm to the significance of heritage assets and this has been tested and confirmed at a recent public enquiry. Instead of managing the assets with screening it is likely that the heritage assets will need to retain substantial elements and open space, with links and views through to the wider landscape to mitigate and offset the harm. The extent and nature of these 'buffers' (as expressed in chapter 7.4.6), would need to be fully illustrated and realised in the ES and at the masterplanning stage. Another issue that would also need to be fully addressed in the ES would be the proposals for interpretation as noted in the Scoping report (e.g. 7.4.6), as well as the likely extent of any s.106 funding that would be made available for heritage matters. The impacts on the heritage assets would also need to be assessed within the policy tests established by the National Planning Policy Framework. The applicant would need to provide sufficient information within the Environment Statement to understand these impacts. The EIA should explore the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them. We advise that all supporting technical information for example the Desk-Based Assessments are included as appendices. Where relevant, the cultural heritage section would need to be cross-referenced to other chapters or technical appendices; for example noise, light and traffic. In addition to established policy and guidance, Good Practice Advice notes 1, 2 and 3 have now been published. These supersede the PPS 5 Practice Guide, which has been withdrawn. Guidance on setting is incorporated into GPA 3 and this supersedes the advice previously published as The Setting of Heritage Assets. This guidance provides a thorough discussion of setting and methods for considering the impact of development on setting

#### Recommendations:

We consider that an ES would be required for this development, and that it is appropriate to consider the impact of the development on the significance of designated and non-designated heritage assets and their setting. We are concerned by the approach that is outlined in the scoping report for cultural heritage and consider that some changes would be necessary in order to deliver a fair assessment in line with the policies of the NPPF. Given the nature of the application and the implications for designated and non-designated heritage assets that survive within the development area we would recommend that the applicant engage in further pre-application discussions with Historic England and Suffolk County Council Archaeology Service at the earliest opportunity.

#### **Suffolk County Council Archaeological Service**

##### Potential Impact

The EIA Scoping Report outlines a commitment to preservation *in situ* of monuments and buildings that will be a theme in the EIA, and recognises a need to manage potential development impacts on physical structures and their settings. SCCAS supports the proposals (6.1.1) for the EIA to assess the significance of designated and non-designated assets, identify potential impacts, and present mitigation measures.

##### Baseline Information

The information in the Historic Environment Record shows that Scheduled Monuments on the site form part of a complex of prehistoric barrow monuments across Brightwell Heath and around Martlesham (some extant, some excavated, some identified as cropmarks). Given the potential of the area, the programme of trial trenched archaeological work carried out for application C/09/0555

targeted parts of the site that have not been previously quarried. Trenched archaeological evaluation has indicated that surviving deposits are relatively sparse and there have been impacts of 20th century military activities and cultivation. However, the work identified a Bronze Age pit which is indicative of activity relating to the broader landscape of prehistoric barrow burials recorded in the Historic Environment Record across and beyond the site. The archaeological work identified a more extensive area of largely rectilinear enclosures in the northern part of the site that may be part of extensive cropmark landscapes, largely undated but probably Iron Age or Roman, to the north and west of Martlesham. The remains are more diverse than simply Iron Age features to the east, as indicated in the EIA scoping. More broadly, there are also further remains relating to WW2 features beyond the trench shelter that is referred to (6.3.1).

A survey of twentieth century airfield structures was also carried out for submission with a previous planning application. This has been subject to critique by Historic England expert, Wayne Cocroft. The site was part of Martlesham Airfield, which first saw active service in 1917 and which played a role in the development of aviation technology: structures form part of the important 20th century heritage of the area. Scheduled monument SM21267 comprises a barrow with a pill box. Examples of other 20th century structures in the development area include a further pill box, an unusual octagonal structure, which formed the base of a tower and a brick building relating to the early airfield.

#### Methodology:

The Suffolk County Council Archaeological Service (SCCAS) agrees with the proposals in chapter 6 and 7 of the Scoping Report to consider and assess designated and non-designated heritage assets.

For clarity, and to avoid repetition, the applicant may wish to consider combining the 'below ground' archaeology and 'above ground' archaeology chapters (6 and 7) into a single 'Archaeology and Cultural Heritage' chapter, which would fall logically into 'prehistoric' and '20th century' cultural heritage sections. However, SCCAS recognises that assessment methodologies have set requirements.

The EIA should synthesise previous assessments but additionally, an updated Historic Environment Record search is needed to ensure that any more recent information is reflected in the synthesis of site investigation history (particularly in relation to any ongoing mineral extraction).

The EIA methodology should also ensure that the review of standing 20th century structures and proposals for them within the context of development fully captures further expert input from dialogue that has occurred since the Environmental Statement was written for the previous application.

#### In addition:

The EIA should include proposals to record and advance better understanding of the significance of heritage assets before they are damaged or destroyed. This could be through archaeological excavation, archaeological monitoring and/or further evaluation to define areas for investigation. Proposals should be discussed and agreed in principle with SCCAS.

For Scheduled Monuments, extant features and built heritage, approaches to conservation should be established in the EIA and will require agreement with Historic England. Development areas should be designed to minimise construction and operational impacts on monuments and should particularly protect or enhance the setting of the bowl barrows in Spratt's plantation (SM21268) and the scheduled barrow with later pillbox (SM 21267), which is a distinctive landscape feature. Impacts on setting, buffers to development, sight-lines, management during the construction phases of development, and longer term management (e.g. to avoid erosion) will require discussion and agreement with Historic England. Potential management options could include creation/maintenance of heathland. Section 7.4.3-5 considers design of development but strong

links to landscape and open space design should also be brought in to proposals to protect and enhance the setting of monuments, respecting their landscape context. Links between the Landscape assessment/proposals (Chapter 11, 11.4.5) and the setting of built heritage are welcome. The EIA should make suggestions for the setting of monuments in both chapters. Links with biodiversity, habitat and green space should also be made. Broadly, the consideration of monuments in the wider vicinity and beyond the development site, as set out in the EIA Scoping Report, is a good approach.

The scoping report indicates protection of 20th century structures. There is a presumption that there will be a commitment to retention of buildings and conservation of significant 20<sup>th</sup> century heritage. Chapter 7 of the EIA scoping makes a preliminary identification of structures: The Environmental Statement should include a complete catalogue of historic buildings on the site and proposals for them and their settings (section 7.5 of the Scoping Report).

The EIA should include proposals for outreach and enhanced public understanding, and reference to this in the Scoping Report is welcome.

## **ECOLOGY**

**Adastral Park is situated c.1.7km from the Deben Estuary SSSI, SPA and Ramsar site. The Deben Estuary SPA supports nationally important numbers of avocet over winter and internationally important populations of wintering brent geese. The Deben Estuary Ramsar is also designated for wintering populations of brent geese, with noteworthy fauna also including redshank and avocet. Adastral Park is also situated c. 4.9km from the Sandlings Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA). The Sandlings comprise heathland and forest habitat and is designated for its breeding populations of European importance of nightjar and woodlark.**

**Natural England are the statutory consultee in this respect though the scale of the proposal and its sensitive location mean that it is of significant interest to Suffolk Wildlife Trust, the RSPB and the Environment Agency. Suffolk County Council have also provided commentary within their comprehensive response.**

### **Natural England**

Case law<sup>1</sup> and guidance<sup>2</sup> 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.

This development represents a key element of the Suffolk Coastal District Core Strategy Site Allocations. There is potential for recreational disturbance impacts to birds on designated sites as a result of these allocations, and for this reason the Environmental Impact Assessment should take full account of the recreational disturbance mitigation and avoidance measures detailed in the Core Strategy Appropriate Assessment (Landscape Partnership 2011, 2013) and the Statement of Common Ground (September 2012). In relation to the Deben Estuary, further useful information on Birds and Disturbance may be found in the Deben Birds & Disturbance Report (Deben Estuary partnership, 2014). We would also expect the EIA to consider the developing district-wide recreational disturbance mitigation and monitoring strategy.



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.

## 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 (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA 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 close to the Deben Estuary Special Protection Area and Ramsar Site, the Stour & Orwell Estuaries SPA/R, and the Sandlings SPA.

- Further information on these SSSI and their special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within this site 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 <http://publications.naturalengland.org.uk/category/6490068894089216>

In this case the proposal is not directly connected with, or necessary to, the management of a European site. In our view it is likely that it will have a significant effect on internationally designated sites and therefore will require assessment under the Habitats Regulations. We recommend that there should be a separate section of the Environmental Statement to address impacts upon European and Ramsar sites entitled 'Information for Habitats Regulations Assessment', including;

- Recreational disturbance impacts
- The potential for direct hydrological impacts on the Deben Estuary.

## 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 ([www.geosuffolk.co.uk](http://www.geosuffolk.co.uk)) 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 here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

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).

### **RSPB**

We have the following comments on the Ecology chapter of the scoping report.

Overall, this section lacks detail in comparison with chapters discussing other impacts. Very little detail has been given regarding the current biodiversity interest of the site. We note that the text indicates that some ecological surveys have already been carried out. In order to inform the scoping of potential impacts, the results of these surveys should be summarised to provide an overview of species and habitats likely to be present on the site and potentially affected by the development.

Whilst we agree with the general points made about the potential impacts of the development, very little detail is given regarding potential impact pathways and specific receptors and no indication is given of impact significance. Our key concerns based on the information provided here would be habitat loss affecting the existing biodiversity on site (priority or protected species and habitats) during construction and impacts on nearby designated nature conservation sites (water quality and recreational disturbance) during both construction and operation. We would also expect to see an outline approach to mitigation set out here (as in the archaeology sections, for example).

Although the need for Habitats Regulations Assessment is acknowledged, only very limited reference is made to potential effects on the Deben Estuary European sites in the description of potential environmental impacts. We agree that the potential for increased recreational disturbance pressure on European sites (particularly the Deben Estuary SPA and Ramsar site and the Sandlings SPA) could be significant and will require further investigation. We also consider that the potential for any impacts of increased water abstraction and discharge arising from the proposed development upon the Deben Estuary SPA and Ramsar site should be assessed.

The final Environmental Statement should also contain details of proposed biodiversity enhancement measures capable of delivering benefits to species of conservation concern present in the locality, including creation and management of habitats that will meet key ecological needs of such species. Paragraph 109 of the National Planning Policy Framework states;

*“The planning system should contribute to and enhance the natural and local environment by:.....minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Governments’ commitment to halt the overall decline in biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.”*

### **Suffolk Wildlife Trust**

We have read the ecology section of the EIA Scoping report (RSK, Dec 2016) and we note the proposed scope of the ecological impact assessment part of the EIA. In addition to the ecological surveys and assessments identified in the scoping report, we recommend that the following receptors are also considered:

- Hibernating bats (a record, available from Suffolk Biodiversity Information Service, exists for the

site);

- Statutory and non-statutory designated sites (several statutory and non-statutory nature conservation sites are located within close proximity of the development site);
- Otter and Water Vole (water bodies are present on and adjacent to the site and there are records for both species within 2km of the site).

In addition to the above, it should be ensured that the proposed Shadow Habitats Regulations Assessment (HRA) includes assessment of recreational disturbance impacts on the Deben Estuary Special Protection Area (SPA)/Deben Estuary Ramsar site and on other European designated sites within the zone of influence (in particular the Sandlings SPA).

### **Environment Agency**

A standard 2km radius environmental data search should be carried out to determine if any protected species have been recorded within the last 10 years. <http://www.suffolkbis.org.uk/> Water voles may also be present.

The British Standards Biodiversity Code of practice for planning and development, BS42020:2013, provides direction to assist those concerned with ecological issues as they arise through all stages of the planning process. The standard should be followed to integrate biodiversity into all stages of the assessment, planning, design and development process.

The ES should show the site has been surveyed for invasive flora and if found a detailed method statement for removing or the long-term management or control of the same should be described. The method statement shall include measures that will be used to prevent their spread of during any operations e.g. mowing, strimming or soil movement. It shall also describe measures to ensure that any soils brought to the site are free of the seeds / root / stem of any invasive plant listed under the Wildlife and Countryside Act 1981, as amended.

### **Suffolk County Council**

The scoping report seems very focused on on-site impacts and there is not enough emphasis on the construction and operation impacts on the Deben Special Protection Area (SPA), within 1km to the east.

Recreational impacts are a key consideration. The disturbance to wildlife from a greater level of human-related activity is likely to be identified by Natural England. Table 8.1 makes no mention of the Deben SPA features (e.g. overwintering Avocet) nor the features of the Deben SSSI (overwintering wildfowl and waders).

This issue is an important theme covered in the Deben Estuary Plan (see [www.debenestuarypartnership.co.uk](http://www.debenestuarypartnership.co.uk) ).

Furthermore, the Martlesham Soakaway Acid Grassland County Wildlife site, which sits directly adjacent to the site boundary, isn't identified nor does the scoping report address the avoidance of impacts either during construction or operation of the site.

Priority species and habitats and protected species appear to be adequately covered. Skylarks are a particular consideration given the arable nature of much of the site

## **FLOOD RISK AND DRAINAGE**

**The Environment Agency and Lead Local Flood Authority (Suffolk County Council) have contributed with responses in this respect.**

### **Environment Agency**

#### The water environment

This site is located above Secondary A and Principal Aquifers, a Water Framework Directive groundwater body, and a WFD drinking water protected area and is relatively near to a watercourse. The site is considered to be of high sensitivity. Parts of the site include a historic landfill and a permitted landfill. Investigation and risk assessment into the pollution potential of the landfills should be provided. The applicant should also be aware of the potential for ground gas and stability issues associated with the landfills.

We welcome the acknowledgement of the need of a surface water drainage scheme and for a Phase I report. We note the potential for shallow groundwater at the site and the suitability of infiltration SuDS will need to be carefully considered. We have included some advice as an appendix that should be considered when assessing the options for surface water drainage.

#### Surface water

The Anglian river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

The scope of the assessment should proportionate to the scale and potential ramifications of the activity being undertaken. For small-scale, low-risk activities the assessment will involve the collation of data relating to the affected waterbodies available via the Catchment Data Explorer <http://environment.data.gov.uk/catchment-planning> and a desk-based evaluation of the likely consequences, making simple links between the activity and any receptors (e.g. fish) that could be affected. For large-scale, high-risk activities the assessment is likely to be a bespoke document that includes empirically gathered data and first-hand expert opinion.

All the local watercourses are small and the development must not result in any adverse impact due to poor water quality or excessive flows. There is a sensitive receptor downstream (Moon & Sixpence) which needs to be protected.

The soils in the area are sandy & free draining. The ES should describe additional protection measures that may have to be employed to eliminate any spills or damage that may affect groundwater or surface waters including risky activities such as refuelling and overnight parking of plant.

Foul and surface water systems should be designed to minimise the risk of surcharging.

#### Foul water

The most obvious place to connect this development into the foul sewer network is the catchment of Woodbridge Water Recycling Centre. Our figures indicate that there is sufficient space within the permitted capacity here to accept this development. The ES should demonstrate consultation with Anglian Water regarding capacity and potential pinch-points in the local network and how they may be overcome.

#### Potable water:

Published information from Anglian Water suggests there is sufficient capacity in the local clean water system to supply this development. The ES should demonstrate consultation with Anglian Water to confirm the supply situation and describe possible local pinch-points and how they may be overcome.

### **Suffolk County Council – As Lead Local Flood Authority**

This part of east Suffolk suffers from lack of water resources (both over licenced and over abstracted). The impact of this development on water resources (quality aspects are covered by not quantity) could impact both water-sensitive environments and more significantly, the local irrigated farming economy. The development is likely to have been incorporated into the assumptions that inform Anglian Water's Water Resource Management Plan, for which separate assessments are required. The water resources team at the Environment Agency can provide more details.

The scoping report for the EIA contains a section which relates to how the proposal will impact on the water environment in general. The site is in Flood Zone 1 and above a minor aquifer but is classed as a high area of groundwater vulnerability. SCC would expect to see a section on the existing hydrology, flood risk and hydrogeology for the site and assess whether the proposed development could potentially increase contamination and runoff due to the built development. A flood risk assessment is usually required by the EA.

The Environmental Statement should assess the impacts of the proposed development upon controlled waters with particular emphasis on both the quantity and quality of surface water. ES should recommend mitigation methods to control or reduce the potential impacts of the new impervious surfaces. This may include sustainable drainage systems – SuDS should be suited to the local hydrology and hydrogeology.

No mention has been made to the Suffolk Flood Risk Management Strategy in the policy section. Of particular note should be Appendix A - SuDS Guidance, Standards and Information.

Please note that any application that proposes SuDS would have to deliver a strategic SuDS strategy or masterplan that adheres to SCC protocol and guidance on SuDS systems, as well as national standards.

- We would welcome pre-application discussions with the developer and agents regarding SuDS.
- As above we require a geotechnical investigation to accompany the strategy, with soakage rates submitted in the report to assess the use of infiltration and groundwater levels.

## **GROUND CONDITIONS AND CONTAMINATION**

**The site has areas of landfill Suffolk Coastal District Council's Environmental Protection Officers and the Environment Agency and have contributed with responses in this respect.**

### **Suffolk Coastal District Council - Environmental Protection**

The scoping report makes comment in relation to the contaminated land investigation. For completeness, please find below further guidance:

#### Site characterisation

Unless otherwise agreed in writing by the Local Planning Authority (LPA), a written report(s) assessing and fully characterising contamination (including ground gas) at the site (whether or not it originates from the site) must be submitted to and approved in writing by the LPA prior to the commencement of any development (including any construction, demolition, site clearance, removal of underground tanks and relic structures). The activities and report(s) characterising contamination at the site must be conducted in accordance with prevailing guidance and good practice (including BS10175:2014 and CLR:11) and must include, but are not limited to:

#### Phase 1 desk study

- A desk study, including a site reconnaissance, which must include at least:
- a detailed appraisal of the site's history;
- an inspection and assessment of the current condition of the site;
- an assessment of the potential types, quantities and locations of hazardous materials and contaminants considered to potentially exist on site;
- a conceptual site model; and
- a preliminary assessment of the risks from contamination at the site to the relevant receptors defined within the prevailing edition of the Environmental Protection Act 1990:Part 2A Contaminated Land Statutory Guidance including human health, ground waters, surface waters, ecological systems and property (both existing and proposed). And where potential contamination is identified by the phase 1; Phase 2 Intrusive site investigation

#### An intrusive investigation which must include at least:

- details of the locations and types of sampling points and justification for the sampling strategy;
- sampling point logs including subjective descriptions of the ground encountered;
- explanation and justification for the selection of analytes;
- results from the laboratory analysis of soil and water samples;
- a revised conceptual site model; and
- an updated assessment of the risks from contamination at the site to the relevant receptors defined within the prevailing edition of the Environmental Protection Act 1990:Part 2A Contaminated Land Statutory Guidance including human health, ground waters, surface waters, ecological systems and property (both existing and proposed).

The intrusive investigation of a potentially contaminated site is an iterative process which may need to be repeated several times before the site can be considered to have been fully investigated and characterised. This condition will not be discharged until the LPA is satisfied that contamination at the development site has been fully characterised.

#### Site remediation

Unless otherwise agreed in writing by the Local Planning Authority (LPA) a detailed remediation method statement (RMS) must be submitted to and approved in writing by the LPA prior to the commencement of any development (including any construction, demolition, site clearance,



removal of underground tanks and relic structures). The RMS must be written in accordance with prevailing guidance and good practice (including CLR:11) and must include, but is not limited to:

- an explanation, including justification, for the selection of the detailed remediation methodology;
- detailed information for all works to be undertaken including drawings and plans, materials, specifications and site management procedures;
- proposed remediation objectives and remediation criteria;
- proposals for validating the remediation and, where appropriate, for future monitoring.
- As a minimum the RMS must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

#### Implementation of remediation

Unless otherwise agreed in writing by the Local Planning Authority (LPA) prior to any occupation or use of the approved development the approved Remediation Method Statement must be completed in its entirety. The LPA must be given written notification two weeks prior to the commencement of the remedial works.

#### Validation

Unless otherwise agreed in writing by the Local Planning Authority (LPA) a validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:

- evidence that the approved Remediation Method Statement has been carried out competently and effectively in its entirety; and
- evidence that the remediation has been effective and that the site is now suitable for the approved development.

### **Environment Agency**

Environmental Permitting Regulations 2010 – landfill

The following information should be considered in the assessment:

- The landfill area itself is divided into two separate permitted sites; *Waldringfield South* and *Waldringfield* – both are adjacent to one another and come under the same operator
- Both sites were / are licensed to accept inert waste
- Waldringfield South has gone through the closure and restoration process and we would expect the operator to request a surrender of this permit in the near future.
- The Waldringfield site has essentially been mothballed whilst the operator looks to agree closure / restoration with us, the discussions are ongoing and requires some work
- Waldringfield South consists of 5 phases; 1-5
- Waldringfield consists of 4 phases; 6-9 with 8 and 9 only being partially tipped to date
- The operator submits both landfill gas and groundwater monitoring data from across the entire area (both sites) on a quarterly basis

#### Landfill Gas

- Monitoring data is collected from 4 compliance points; 2 in-waste in the North / West section of the site and 2 along the South / East perimeter adjacent to Brightwell Heath
- Over the last reporting year, methane levels have been 0% at all compliance points
- There is an on-going history of minor breaches of the carbon dioxide limit (1.5%) at the perimeter compliance points adjacent to Brightwell Heath

#### Groundwater

- Monitoring data is collected for 2 compliance points, both of which are down the hydraulic gradient of the site, to the South East next to Brightwell Heath

- There are no recent history of any non-compliance with groundwater quality controls

There is also an historic landfill associated with the site known as The Swale which ceased to accept waste at the end of 1996. On the 22nd of June 2007 we sent the local authority a CD containing historic landfill data which has all the information we hold on the historic landfill sites within 250m of this development proposal.

## **LANDSCAPE AND VISUAL IMPACT**

**As the development site is within/adjacent to Suffolk Coast and Heaths Area of Outstanding Natural 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 Suffolk Coast and Heaths.**

**The District Council's Arboricultural and Landscape Manager has reviewed both the original scoping report and this subsequent additional LVIA specific scoping material and is content that it forms a suitable basis for carrying out the required LVIA.**

### **The Suffolk Coasts and Heaths AONB Team**

Viewpoints and visual receptors (as agreed by the LPA) should include potential views in and out of the designated landscape. Photomontages of selected viewpoints will be helpful in representing the likely scale and impact of the development from certain viewpoints and it is understood that these are proposed.

Reference has been made in the Scoping Report to the AONB Management Plan, the AONB Partnership Position Statement regarding development within the setting of the AONB as well as published information regarding the Landscape Character. Further detail regarding the Natural Beauty & Special Qualities of the AONB can be found on the AONB website - the submitted documentation should also consider how the development will impact on the features which make up the natural beauty and special quality of the AONB.

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. The use of Landscape Character Assessment (LCA) is encouraged, 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.

### **Suffolk County Council Landscape Team (non-statutory consultee)**

#### Baseline Information

Set out in the scoping report the baseline should include the Suffolk Landscape Character Assessment 2008/11 [www.suffolklandscape.org.uk](http://www.suffolklandscape.org.uk) . I suggest that subject to agreement with the LPA this should be used in preference to the Regional Landscape Assessment as proposed in the in the scoping report provided.

It should also be noted that the current management plan covers the period 2013 – 2018, not to 2008-2013 as set out in the scoping report – this information can be found at <http://www.suffolkcoastandheaths.org/about-us/aonb-management-plan/>

Furthermore the Special Qualities of the AONB have been set out in detail and published; <http://www.suffolkcoastandheaths.org/assets/About-Us/V1.8Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf>

#### 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 or its updates.

All viewpoints and any photo-montage locations, as well as the extent of the Study Area, should be agreed with the SCDC, in writing before this work is carried out.

A detailed methodology for the LVIA should also be finalised and agreed with the LPA prior to the work being carried out

The LVIA should clearly assess the proposal, identifying residual impacts in *both* visual and landscape terms.

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 HE guidelines, <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/> within a Heritage Assessment.

## **NOISE**

The development has the potential to create construction noise, though this would be set against the baseline of existing quarrying noise on the site and surrounding residential uses are protected by an earth bund which may remain within earlier phases of development. The future occupants have the potential to be affected by existing and increased A12 road noise. Road noise on the A12 to adjacent existing dwellings will alter as a result of highway works and physical changes to the development site. The Environmental Protection Officer at SCDC has been consulted and is happy with the proposed approach to noise assessment and noise mitigation in the scoping report and will comment further when the assessment is received.

## **SOCIO ECONOMICS**

The proposed development will significantly increase the population of the area which will in turn materially alter its socio-demographic characteristics. The likely increase in economic spend, job requirements and social and community needs (beyond primary education requirements) have not been considered by the applicant. These socio-economic impacts have the potential to be significant in terms of their magnitude, duration and their geographical extent.

It is recommended that an assessment of socio demographic and population impacts be carried out within the EIA to establish the potential impacts upon a number of baseline socio demographic indicators including:

- Population and demographic profiles
- Economic activity
- Education and Skills
- Deprivation and Poverty
- Crime and Community

The impact of the proposed development should be assessed in terms of the change in population and demographics of the area, the employment requirements of the new population and their education requirements and the impact of the population and the layout of the development on community cohesion and crime.

Baseline information can also be obtained from East Suffolk Business Plan 2015-2023 and Suffolk Growth Strategy.

Regarding Economic Activity and Employment (para. 13.3.3), more detail regarding 'Northern Quadrant' would be useful such as when will land come forward and associated cumulative impacts.

For potential social economic impacts (para. 13.4.1 and 13.4.4), it is important to know the scale of the accommodation that is being planned, the mitigation on existing companies in the area, and what is the time horizon for the employment phase.

The study area (para. 13.5.2) of 3km does not appear to be sufficient to properly assess impacts locally.

## **PUBLIC HEALTH**

Health impacts are commonly part of Integrated Impact Assessments that combine an Environmental Impact Assessment (EIA) and a Health Impact Assessment (HIA). There is an interaction between human health and the natural and physical environment as well as transportation and environmental quality, such as air quality that should be reviewed in the ES. Health impacts are also linked to access to community facilities such as schools. Residents within large developments who moved sooner had higher than average mental health problems, which were attributed to a lack of facilities in the new community.

The baseline health conditions can be obtained from the Joint Strategic Needs Assessment and reference should also be made to the linkage to the Health and Wellbeing Strategy. Improvements to pedestrian and cycle routes and the access to open space can have positive benefits to existing populations if incorporated into an assessment.

***It is understood that the application will not include an HIA though this will be addressed through other supporting documents/statements.***

## **TRANSPORT AND TRAVEL PLANNING**

**The development will require substantial changes to the A12 which comes under the responsibility of Suffolk County Council and the Local Highway Authority. The development may require improvements to the Seven Hill Roundabout at the A12 and A14 junction and the A14 is Trunk Road which comes under the responsibility of Highways England.**

### **Local Highway Authority**

#### Traffic

The transport section of the EIA Scoping Report references the Transport Assessment (TA), the results of which will need to be incorporated into the EIA (e.g. air quality and noise). The EIA Scoping Report includes additional assessment topics related to the pedestrian experience, which is welcomed, in addition it would be useful to include other sustainable modes such as cycling and buses in this assessment. Some of the distances to key local services are likely to be longer than comfortably assessable on foot, therefore cycling and buses may be more appropriate for achieving a good share of these journeys by sustainable means.

#### Travel Plans

Travel Planning will be part of the TA. The promotion of active travel is likely to have associated and positive health impacts.

## Highways England

14.1.2: It is clear that the TA will go into much more detail than its parent EIA. Consequently this report is very light on detail. However, the report recognises the need for more detailed discussions with Suffolk CC and ourselves, as referred to in para 14.5.12.

14.2.1: The list of guidance and policy documents needs to include DfT Circular 02/2013 “The strategic road network and the delivery of sustainable development”

14.5.2: Generally speaking, the 30%/10% thresholds outlined here, albeit appropriate for the broader purposes of the EIA, are unlikely to be appropriate for the TA. 14.5.4 and 14.5.7 partly alludes to this in relation to locations at or close to capacity. In practice there is no threshold for this – a very small increase of traffic at an already congested junction could be very significant but negligible elsewhere. A much more pragmatic approach is therefore required.

14.5.7: for the strategic road network the extent of stationary queuing is as significant as degree of saturation. In particular, stationary queues on exit slip roads that extend back onto main line carriageways are likely to be particularly critical, and will also be a key factor for safety covered in 14.5.11.

Something that is not referred to in the report is green travel planning. I appreciate it is likely either that the TA will address this or a standalone framework travel plan will be produced but it would be sensible for the EIA to consider the extent to which a well designed and adequately funded travel plan for the development could address some of its environmental challenges.

***Pedestrian and Cycle accessibility and routes fall within this topic section and in these respects the following responses have been received.***

### **Suffolk County Council Public Rights of Way Team**

The development will create additional demand for recreation and open space within the wider area and use of the rights of way network. The provision of safe means of access, such as crossing the A12, must be a component of the transport assessment and can be integrated into the EIA.

The impact on popular destinations such as Waldringfield and the Deben estuary. This issue is linked to the ecological impact but the mitigation, such as the creation or improvement of existing high quality road walking and cycling routes, is likely to have positive health impacts to existing and future residents.

### **Natural England**

#### 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. Consideration should also be given to the potential impacts on the adjacent/nearby [Click here to enter text](#). National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. 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.

## CUMULATIVE IMPACTS

**In considering the potential for significant environmental effects, regard must also be given to the combined effects of the proposed development with other committed schemes (including existing Development Plan allocations and extant planning permissions). The applicant has already sought to confirm a range of committed schemes (including outstanding appeals) with SCDC before proceeding with the necessary environmental assessments.**

### Natural England

#### 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

## **ENVIRONMENTAL MANAGEMENT**

**This topic section has been added as a result of feedback from Suffolk County Council. Whilst this is not within the scope of the ES these matters should be addressed elsewhere within the submission.**

### **Suffolk County Council - Waste**

#### Transfer Stations

Suffolk Coastal District Council currently deliver the waste they collect to the Waste Transfer Station on Foxhall Road. This is a constrained facility with no scope for expansion. This site will cease in the near future and it has been necessary to identify a new site at Ransomes Europark. The current estimated cost for provision of a new Transfer Station is £5m.

The total tonnages currently processed via the Foxhall Waste Transfer Station is approximately 40,000 per annum. This transfer station is currently at full capacity. An additional 2000 households would produce a further 1,000 tonnes per annum.

#### Household Waste and Recycling Centres

SCC also provides a network of 11 Household Recycling Centres (HWRCs) where residents and small businesses may take a wide variety of items for recycling, reuse and disposal. Each HWRC serves an average of 29,550 households.

The HWRC which would service the 2000 new households on Adastral Park would be the current site at Foxhall Road.

Currently a total of 12,200 tonnes per annum are processed through this site with approximately 271,400 vehicles accessing the site per annum. Provision for a further 2000 households would require the site to be extended, developed and reorganised in order to cope with additional traffic and the 820 additional tonnes of waste per annum.

This HWRC is currently running at full capacity and at some points during the week demand exceeds capacity. At these points there is consequent impact on the traffic management on site and sometimes queuing occurs on the highway.

Recent modifications have been made to the site to better manage the increase in site usage but further modifications on this site to accommodate more households are not possible without significant investment.



## CONCLUSION

The proposed development is Schedule 2 development as defined by the Regulations.

The substantial scale of the proposed development and the sensitivity of the location has the potential to give rise to significant independent and cumulative effects on:

- Air Quality
- The Historic Environment
- Ecology
- Flood Risk and Drainage
- Ground conditions and contamination
- Landscape and Visual Impacts
- Noise
- Socio Economic effects
- Transport and Travel Planning

As such, the proposed development is considered by the LPA to be EIA development as defined by the Regulations that requires the assessment of the above technical matters within an Environmental Statement.

The general methodology to be taken to the assessment of environmental effects should be outlined within a specific chapter of the ES.

Specifically the criteria to be used for the assessment of significance should be outlined and should be based upon conclusions over the sensitivity of receptors and the magnitude of any impact. The significance of any effect should be clarified as Severe, High, Moderate or Low.