

# **Appendix B3**

## **Scoping Responses and Actions**

Consultees Comments	Discipline	Response/Action Taken
<b>WPC Response</b>		
An explanation of precisely what land the 161ha covers would be helpful.	All	This is contained with the ES.
There is an AQMA near the Melton Hill/Lime Kiln Quay Rd junction in Woodbridge. See: <a href="http://www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/woodbridge-junctionaqma/">http://www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/woodbridge-junctionaqma/</a>	AQ	The AQ assessment has proven a negligible impact upon this AQMA.
Why would IC (see comment above) monitor pollution concentrations adjacent to the A12, when it is in SCDC's area? There are in fact 3 NOx detectors in back gardens backing onto the A12 at the north, middle and south ends of Martlesham Heath.	AQ	The three detectors within Martlesham Heath were assessed. The impacts at these receptors have been minor, with concentrations remaining within allowable tolerance.
(Both Heritage Assets Maps, between p26 & p27). The '1km' scale indicators are incorrect, they appear to indicate roughly 150m (1st map) and 300m (2nd map).	Above ground heritage	The distances marked on the radii are correct. It is not possible to add a scale to promap.
(2 <sup>nd</sup> Heritage Assets Map, between p26 & p27) All Saints' Church, Waldringfield is Grade II* listed, and is about the same distance from the site as Church of St Mary, Martlesham, so for consistency should be included.	Above ground heritage	Noted, and have included for consistency.
Nowhere in this section is there a list of designated sites that would potentially be impacted by the development. Surely a scoping document should state which sites need to be assessed for environmental impacts and which do not. The following can be found within about 1 mile of the Adastral Park site: <ul style="list-style-type: none"> <li>• 1 Ramsar site (Deben Estuary)</li> <li>• 1 SPA (Deben Estuary)</li> <li>• 5 SSSIs (Deben Estuary, Ipswich Heaths, Sinks Valley Kesgrave, Newbourne Springs and Waldringfield Pit)</li> <li>• 9 CWSs</li> </ul>	Ecology	The following sites have been assessed: Deben Estuary SPA/Ramsar/SSSI Sandlings SPA Stour and Orwell Estuaries SPA/Ramsar Ipswich Heaths SSSI Newbourn Springs SSSI Deben Estuary SSSI Sinks Valley, Kesgrave SSSI Nacton Meadows SSSI Riverside House Meadow Hasketon SSSI Sutton and Hollesley Heaths SSSI Bixley Heath SSSI Sandlings Forest SSSI Crag Pit, Sutton SSSI Mill Stream LNR Sandlings LNR Bixley Heath LNR In addition a total of fourteen CWS (Martlesham Soakaway Acid Grassland; Martlesham Heath Wood; Old Rotary Camping Ground; Brightwell Grazing Meadows; The Mill River; Martlesham Common; Valley Farm Meadow; Martlesham Plantation Acid Grassland; Lumber Wood; Kyson Meadows, Sluice Wood and Martlesham Creek Reed; Bloomfields Farm Meadow; Osier Bed and Martlesham Plantation; Kesgrave Woods/Sinks Valley; and Newbourne Springs Meadows)
The Deben Estuary also qualifies as a SPA because it supports nationally important numbers of avocet and internationally important numbers of dark-bellied Brent geese. In addition it supports nationally important numbers of the following migratory waterfowl: shelduck, grey plover, black-tailed godwit and redshank.	Ecology	sHRA and bird surveys on the proposed development site (and also at the estuary) will assess impacts/mitigation required
The Deben Estuary also qualifies as a SSSI because it supports approximately 40% of Suffolk's area of saltmarsh, and three nationally scarce plant species: Marsh Mallow <i>Althaea officinalis</i> , Shrubby Seablite <i>Suaeda fruticosa</i> and Small Cord-grass <i>Spartina maritima</i> . The nationally rare Mollusc <i>Vertigo augustior</i> and nationally scarce <i>V. Pusilla</i> have also been recorded.	Ecology	sHRA will assess impacts/mitigation required
The 'Existing Baseline' appears to only cover Adastral Park. It should also include the nearby environmentally sensitive sites, e.g. the Deben Estuary SSSI/SPA/Ramsar, which should be listed	Ecology	Bird surveys and visitor surveys being undertaken at Deben Estuary.
It is not clear how changes to visitor numbers resulting from the increase in the number of residents will be estimated (especially given that the baseline figures aren't known - see comments on §8.3.1 above). And it is not clear how the impact of the changes to visitor numbers on wildlife will be estimated.	Ecology	As above
It is not clear how the need for mitigation will be assessed, or how different potential types of mitigation will be compared and assessed.	Ecology	This is dealt with within the sHRA.
We suggest that other bodies such as the Suffolk Wildlife Trust, the Deben Estuary Partnership and the RSPB are also consulted.	Ecology	Meetings with SWT undertaken.

The potential of SuDS (Sustainable Drainage Systems) to prevent the problems listed in §9.4.3 is not mentioned. The EIA should consider how incorporating the principles of SuDS into the design of the buildings and infrastructure could lower flow rates, thus increasing water storage capacity and reducing the transport of pollution to the water environment.	Flood Risk and Drainage	The Flood Risk Assessment evidences that all storm water generated by the development will be managed on site through SuDS. The measures include swales, soakaway drainage and infiltration basins. A minimum two-tier treatment train will be provided to improve water quality.
“All potential impacts can be reduced by suitable mitigation ...” The first option should be to prevent the impacts by incorporating the principles of SuDS into the design of the buildings and infrastructure. Only after prevention measures have been exhausted should mitigation be considered.	Flood Risk and Drainage	As response above.
Although light pollution is mentioned in several places (§8.2.2, §11.2.12 and §11.4.12), no indication is given as to how it will be measured, or what its likely impacts would be if it cannot be reduced to negligible levels	Ecology <u>Note:</u> Within the remit of the LVIA. A lighting assessment will be required to consider lighting impacts in detail.	The LVIA ES Chapter includes night time photographs from key locations, including to the southeast of the site on the edge of the AONB.  The assessment gives consideration as to how the proposals may impact upon the night time landscape and visual context, as well as identifying mitigation measures employed in order to minimise light pollution.  Whilst reference will be made to the lighting assessment within the LVIA, the assessment of night time landscape and visual effects will comprise an overall judgement.  We will propose a ‘sensitive lighting strategy’ within our ES chapter to reduce impacts from lighting.
The site boundary contains mature tree belts and woodland to the east and southern boundaries.” There aren’t any tree belts on the eastern boundary that are within the site. There are some wooded areas, but these are all outside the site, mostly in the grounds of the Moon and Sixpence. The south-east boundary is mostly open fields.	Ecology	It is acknowledged that the tree belts and woodland to the northern / north-eastern site boundaries are situated outside the red line. The woodland within the grounds of the Moon and Sixpence combine with woodland and tree belt within the local landscape to contain the site in views from the wider landscape to the north and south.  The proposals include for the creation of a soft transitional edge to the east, with hedgerows and trees reflecting field boundaries and low density development set beyond areas of informal open space and tree planting providing a characteristic rural settlement edge that is sensitive to the views towards and from within the AONB.  There may be some discrepancy with respect to the northeast boundary and which fence denotes the boundary of the site as noted during the workshop walkover. However this does not affect/constrain our assessment with respect to ecology
“The temporary increase in traffic due to construction is likely to be indiscernible from daily variations in traffic flow.” This is debatable, and is in conflict with the statement in §14.4.1. The impact of construction traffic noise would also depend on which access point to the site is being used. If an access point on Ipswich Rd is used the increased noise will be significant. In any case surely the purpose of the EIA is to assess the temporary increase in traffic noise due to construction, decide if it is indiscernible from daily variations in traffic flow noise, and if not propose avoidance or mitigation measures.	Transport	A full appraisal of temporary traffic has been discussed within the Transport Chapter, with suitable mitigation through the adoption of a Construction Environmental Management Plan proposed.
Waldringfield Primary School is also close to the site (~1.2km to the south-east)		Noted.
Another potential negative impact is the risk of increased crime and disorder due to the population increase, and the resultant increased pressure on police resources.	Socio-Ec	This is addressed in the mitigation section of the socio-economic assessment, CEG are committing to Secured by Design.
It is not clear what the scope of the Transport Assessment will be. Given the scale of housing allocations in the Felixstowe and East of Ipswich Area the traffic and transport assessment should include the Orwell Bridge, the A14, the Foxhall Rd, the A1214, and the minor roads such as Newbourne Rd (Waldringfield Heath crossroads to the Martlesham Red Lion) and the Ipswich Rd (Waldringfield Heath crossroads to Waldringfield)	Transport	The TA scope was prepared and agreed with Suffolk County Council in advance of the technical modelling work. A copy of the scoping note will be provided within the Appendix of the Transport Assessment.
Access to the development site from Ipswich Rd should be avoided as this would direct traffic towards the AONB and the Deben Estuary SPA. It would also encourage commuter ‘rat runs’ through the development when trying to avoid congestion on the A12. It would be more appropriate to have a circular route from 2 access points on the A12, similar to Eagle Way on the Martlesham Heath residential development.	Transport	The TA provides evidence to the requirement for access from Ipswich Road for technical, safety and viability reasons. The principle of access from Ipswich Road has also been formally agreed by Suffolk County Council.
“An appraisal will be undertaken of potential cumulative impacts, which will include a check for other planning applications in the vicinity”. What does “in the vicinity” mean? Will it cover the developments mentioned in our comment on §15.2.1, above? (the north Ipswich ‘garden suburb’, and the Sizewell C)	Cumulative	These have been considered within the ES.  Tyler Grange considered the North Ipswich Garden Suburb allocation and whether this has the potential to result in significant landscape and visual effects.

It would be useful to include other sustainable modes such as cycling and busses in this assessment, as 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.	Transport	A comprehensive Travel Plan will be included within the Transport Assessment which outlines all proposals for modal shift and sustainable travel.
We will request details of all sustainable transport modes as part of the Transport Assessment	Transport	
<b>Suffolk County Council Flood and Water</b>		
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	Flood Risk and Drainage	Pre app consultation has taken place with Suffolk County Council drainage officers. Their scope of assessment within both the ES Chapter and Flood Risk Assessment has been fully adhered to.
A flood risk assessment is usually required by the EA.	Flood Risk and Drainage	
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.	Flood Risk and Drainage	
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.	Flood Risk and Drainage	
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.	Flood Risk and Drainage	
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.	Flood Risk and Drainage	
We would welcome pre-application discussions with the developer and agents regarding SuDS	Flood Risk and Drainage	
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/Flood Risk and Drainage	Both a Phase I and Phase II Site Investigation has been provided in the planning application.
<b>Suffolk Wildlife Trust</b>		
We recommend that the following receptors are also considered: <ul style="list-style-type: none"> <li>Hibernating bats (a record, available from Suffolk Biodiversity Information Service, exists for the site);</li> <li>Statutory and non-statutory designated sites (several statutory and non-statutory nature conservation sites are located within close proximity of the development site);</li> <li>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).</li> </ul>	Ecology	Hibernation surveys completed. sHRA considers European designated sites, Effects on UK designated sites and non-statutory sites are also considered within the ES chapter. Otter and water vole surveys undertaken in June and October 2017.
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).	Ecology	The sHRA covers this.
<b>The Environment Agency</b>		
The applicant should also be aware of the potential for ground gas and stability issues associated with the landfills.	Ground Conditions	This is known and addressed in the Phase I and Phase II Site Investigations.
We note the potential for shallow groundwater at the site and the suitability of infiltration SuDS will need to be carefully considered – (see appendix for advice)	Flood Risk and Drainage	This is fully captured and commented on within the Flood Risk Assessment.
The ES should demonstrate consultation with Anglian Water regarding capacity and potential pinch-points in the local network and how they may be overcome.	Flood Risk and Drainage	Anglian Water have confirmed their connection and improvement regime. This will be commented on within the Flood Risk Assessment.
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.	Flood Risk and Drainage	
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. <a href="http://www.suffolkbis.org.uk/">http://www.suffolkbis.org.uk/</a> Water voles may also be present.	Ecology	Complete.
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.	Ecology	We are complying with this.
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.	Ecology	Survey complete. Japanese knotweed present. I understand the responsibility of eradication has been left to Bretts. We shall seek confirmation of their methods and/or provide a method statement within our documents.
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	Ecology	As above.

free of the seeds / root / stem of any invasive plant listed under the Wildlife and Countryside Act 1981, as amended.		
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 <a href="http://environment.data.gov.uk/catchment-planning">http://environment.data.gov.uk/catchment-planning</a> 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 firsthand expert opinion.	Ecology	Water bodies on site currently poor for aquatic biodiversity and as such no significant impacts predicted. Fishing lake to be retained.
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.	Ecology/Flood Risk and Drainage	The Flood Risk Assessment evidences that all storm water generated by the development will be managed on site through SuDS. The measures include swales, soakaway drainage and infiltration basins. A minimum two-tier treatment train will be provided to improve water quality.
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.	Flood Risk and Drainage/ Ground Conditions	The ES discusses groundwater contamination with mitigation proposed through measures employed through the Construction Environmental Management Plan.
Foul and surface water systems should be designed to minimise the risk of surcharging.	Flood Risk and Drainage	This is addressed within the Flood Risk Assessment.
The following information should be considered in the assessment: <u>Landfill</u> <ul style="list-style-type: none"> <li>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</li> <li>Both sites were / are licensed to accept inert waste</li> <li>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</li> <li>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</li> <li>Waldringfield South consists of 5 phases; 1-5</li> <li>Waldringfield consists of 4 phases; 6-9 with 8 and 9 only being partially tipped to date</li> <li>The operator submits both landfill gas and groundwater monitoring data from across the entire area (both sites) on a quarterly basis</li> </ul> <u>Landfill Gas</u> <ul style="list-style-type: none"> <li>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</li> <li>Over the last reporting year, methane levels have been 0% at all compliance points</li> <li>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</li> </ul> <u>Groundwater</u> <ul style="list-style-type: none"> <li>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</li> <li>There are no recent history of any non-compliance with groundwater quality controls</li> </ul>	Flood Risk and Drainage/ Ground Conditions	Landfill, gas, and groundwater are extensively covered in both the Phase I and Phase II site investigations. Their sensitivity of risk is assessed and all required mitigation is outlined to achieve a nil detriment impact.
Environment management This chapter seems to have not considered the management of demolition and construction waste.	Environmental Management	This is covered within the Environmental management section.
<b>Environmental Protection</b>		
I am concerned, as the site in fact lies within the Suffolk Coastal District Council boundary, 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 assessment process.	AQ	The AQ assessment has proven a negligible impact upon this AQMA.
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 <a href="http://www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/">http://www.eastsuffolk.gov.uk/environment/environmental-protection/air-quality/</a> and we would expect this to be referenced in the EIA.	AQ	Noted. All necessary monitoring points and historical data readings were incorporated into the AQ assessment.
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:	AQ	All scoping criteria have been incorporated into the AQ assessment.



<ul style="list-style-type: none"> <li>• 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.</li> <li>• Impact of traffic from the operational phase on local residential receptors – particularly in Woodbridge Town Centre and the A1214 through Kesgrave [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.</li> <li>• Suitability of the site for residential development - impact of local air quality on the new houses.</li> <li>• Assessment of the air quality impacts from the demolition / construction phase on local receptors, together with control and mitigation.</li> <li>• Reference to sustainability policies set out by Suffolk Coastal District Council (SCDC) and any other relevant policies set out by SCDC.</li> <li>• 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.</li> </ul>		
<p>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.</p> <p>This should include:</p> <ul style="list-style-type: none"> <li>• Phase 1 desk study</li> <li>• Phase 2 intrusive site investigation</li> </ul>	Ground Conditions	Both a Phase I and Phase II site investigation are provided within the planning application.
<p>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.</p> <p>This should include:</p> <ul style="list-style-type: none"> <li>• an explanation, including justification, for the selection of the detailed remediation methodology;</li> <li>• detailed information for all works to be undertaken including drawings and plans, materials, specifications and site management procedures;</li> <li>• proposed remediation objectives and remediation criteria;</li> <li>• Proposals for validating the remediation and, where appropriate, for future monitoring.</li> </ul>	Ground Conditions	A remediation method statement will be supplied through Reserved Matters and is not a requirement for outline planning stage. A suitable planning condition could be imposed on the consent to ensure future delivery of this statement.
<p>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.</p>	Ground Conditions	Noted.
<p>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:</p> <ul style="list-style-type: none"> <li>• evidence that the approved Remediation Method Statement has been carried out competently and effectively in its entirety; and</li> <li>• evidence that the remediation has been effective and that the site is now suitable for the approved development.</li> </ul>	Ground Conditions	Noted.
<b>RSPB</b>		
<p>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.</p>	Ecology	This is covered within the ES chapter and technical appendices.
<p>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).</p>	Ecology	As above.
<p>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.</p>	Ecology	SHRA assesses this.
<p>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.</p>	Ecology	This is covered within the ES chapter.
<b>Anglian Water</b>		

The use of sustainable drainage systems (SuDS) for the development is encouraged.	Flood Risk and Drainage	Agreed. The Flood Risk Assessment provides evidence that the entire site is managed with SuDS.
We would recommend that the Environmental Statement should include reference to the existing foul sewerage networks and sewage treatment.	Flood Risk and Drainage	This has been incorporated.
In addition to post construction it is unclear at this stage what the requirement for potable water and wastewater services will be during the construction phases. Discussion with Anglian Water should take place to ensure this issue is considered at an early stage.	Flood Risk and Drainage	Anglian Water have provided advice on both foul and potable water connections.
It would be helpful if the Environmental Statement includes reference to Anglian Water's Water Resource Management Plan (WRMP) which was published in 2015.	Flood Risk and Drainage	This is covered within the Flood Risk Assessment.
<b>Matlesham Parish Council – Planning comments</b>		
The Parish Council is very disappointed that a later response date was not specified to allow for the holiday season. It would like to emphasise the need for a robust EIA, which includes monitoring of the effects of the development, which could lead to modifying the development as it progresses. The Council welcomes the proposed assessment of cumulative impacts and notes that as stated under 15.2.1 "The most likely cumulative impacts from a development of this type relate to traffic from other planned development in the vicinity....." Development in the area is not just potential housing development but also the expansion of the Martlesham retail area should be taken into account; traffic movements for Sizewell C and the East Anglia Offshore Windfarm projects will also have an impact on the A12.	Transport/ Cumulative	The scope of road network for assessment was formally agreed with Suffolk County Council. A copy of this scoping note is included within the Transport Assessment.
<b>Historic England</b>		
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.	Above/below ground heritage	Noted. The final chapters have been combined to provide a chapter on Archaeology and Built Heritage.
We are confused by the apparent separation in the report of the below and above ground archaeology and would like to see these two items combined to form a coherent narrative.	Above/below ground heritage	Noted. The final chapters have been combined to provide a chapter on Archaeology and Built Heritage.
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.	Above/below ground heritage	Noted. Archaeological DBA has been produced which underpins the non-designated archaeological asset assessment
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.	Above/below ground heritage	Noted -see comment immediately above
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.	Above/below ground heritage	We have made clear in the chapter that analysis is discursive, professional judgment.
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.	Above/below ground heritage	We have made clear in the chapter that analysis is discursive, professional judgment.
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	Above/below ground heritage	Where appropriate, we have referred to the LVIA in the Chapter.
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.	Above/below ground heritage	ME reviewed the viewpoints from the previous (2009) ES, and recommended the inclusion of two of these in the LVIA, as noted in the Scoping report.
The assessment of 'setting' likewise should not be solely restricted to visual impact, and would need to consider the impact from other environmental factors such as noise, traffic and lighting.	Above/below ground heritage	Noted.
We are also looking to ensure that the analysis of the significance and the setting of the heritage assets are used to inform the development of the masterplan. An expression of the assets setting would need to be incorporated into the masterplan to ensure that any designated assets that would survive within the development area or around its margins retain a sufficient element of its setting to ensure their significance can continue to be recognised and understood.	Above/below ground heritage	An analysis of the significance and setting of the heritage assets has been used in the development of the masterplan through an iterative design process.
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.	Above/below ground heritage	The reference in the paragraph was to existing screening by interposing development and vegetation, rather than proposed screening.
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	Above/below ground heritage	The heritage assets within the Site are to be retained within an area of open space, which is discussed in the chapter.

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.	Above/below ground heritage	We suggested that this is a planning matter, rather than relating to the environmental impact assessment, however, we have identified heritage works and mitigation that could be funded by s106.
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.	Above/below ground heritage	Agreed, we have addressed policy compliance.
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.	Above/below ground heritage	Agreed, we have addressed policy compliance.
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.	Above/below ground heritage	Noted. The archaeological DBA has been included as an appendix of the ES and there are cross-references to other subject matters where appropriate.
<b>Suffolk Coastal District Council – Design and Conservation officer</b>		
Section 6 Below Ground Archaeology – para. 6.5.9, p19 – I suggest that consultation includes with SCC Archaeology and Historic England in respect of the Scheduled Monuments and their settings; and also non-designated heritage assets that have archaeological significance. I suggest that direct reference is made here to engaging with Historic England's own pre-application process as early as possible, given the archaeological significance of the application site (in areas).	Above/below ground heritage	Noted. Consultation with SCC and HE has been undertaken.
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.	Above/below ground heritage	Noted. The Archaeology and Heritage chapters have been combined to provide a single, coherent chapter.
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.	Above/below ground heritage	Noted, and included in the final chapter.
Para. 7.2.5, p22 – should our adopted and published Criteria for the Identification of Non Designated Heritage Assets that are Buildings be included in this list? I think so, myself.	Above/below ground heritage	Noted, and included in the final chapter.
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.	Above/below ground heritage	Heritage assets were identified using professional judgment following desktop and site surveys. This is clarified in the chapter, and criteria in Suffolk Coastal Guidance on non-designated heritage assets were applied.
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?	Above/below ground heritage	As above.
Para. 7.4.2, p24 - At Ravenswood in Ipswich we incorporated a pillbox as an urban design feature into the layout	Above/below ground heritage	Noted.
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.	Above/below ground heritage	Agreed, and deleted from Scoping chapter.
(First) Heritage Asset Map, following p26, key – under Non-designated Heritage Assets, the correct spelling is Nissen Hut (Nissan make cars).	Above/below ground heritage	Noted.
(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.	Above/below ground heritage	These assets were identified in the English Heritage response to a previous 2009 ES produced for the Site as having the potential to experience a change to their setting as a result of development on the Site, and therefore are included and considered here for completeness- will make clear in chapter.
Para. 11.2.3, p43 – oh dear, it really is about time we killed off the long-defunct Suffolk Design Guide.	Above/below ground heritage	Noted. We have not included reference to the Suffolk Design Guide in the chapter.
Para. 11.3.6, p45 - the BT tower is called Pegasus tower and I judge it a significant local landmark.	Above/below ground heritage	Noted, and referred to as such in the chapter.
<b>Brightwell, Foxhall and Purdis Farm Parish Council</b>		
The Parish Council request that a full EIA report is undertaken to assess the cumulative and social impact on the local area.		This has been completed.
<b>Natural England</b>		
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	ALL	See above in relation to "WPC Cumulative Response"



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.		
The potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment.	Ecology	This is covered within the ES chapter.
EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.	Ecology	As above.
The ES should thoroughly assess the potential for the proposal to affect designated sites.	Ecology	As above through the sHRA.
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.	Ecology	sHRA shows no LSE and therefore no appropriate assessment will be required.
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; <ul style="list-style-type: none"> <li>• Recreational disturbance impacts</li> <li>• The potential for direct hydrological impacts on the Deben Estuary.</li> </ul>	Ecology	Not covered in separate chapter but sHRA summarised within Ecology chapter of the ES.
The EIA will need to consider any impacts upon local wildlife and geological sites.	Ecology	Geo SSSI is not covered within ES chapter. This has been discussed with Natural England and will be retained under the current masterplan.
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.	Ecology	As above.
The ES should assess the impact of all phases of the proposal on protected species.	Ecology	This is covered within the ES chapter.
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.	Ecology	As above.
Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants.	Ecology	As above.
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.	Ecology	As above.
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.	Ecology	As above.
Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site.	Ecology	Complete.
In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year.	Ecology	Complete .
The Environmental Statement should include details of: <ul style="list-style-type: none"> <li>• Any historical data for the site affected by the proposal (eg from previous surveys);</li> <li>• Additional surveys carried out as part of this proposal;</li> <li>• The habitats and species present;</li> <li>• The status of these habitats and species (eg whether priority species or habitat);</li> <li>• The direct and indirect effects of the development upon those habitats and species;</li> <li>• Full details of any mitigation or compensation that might be required.</li> </ul>	Ecology	This is provided within the ES chapter.
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.	Ecology	As above.
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.	Landscape	The LVIA evaluates the existing landscape character and visual receptors in the wider landscape with photo views and photomontages produced to demonstrate the likely impact that the proposed development within the site will have on the landscape and visual amenity.

		The LVIA has considered the landscape character within the AONB and that of the site, this assessment has allowed for a judgement to be made against the quality of both the existing landscape and the development proposals.
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.	Landscape	<p>The LVIA includes a site-specific landscape character assessment that identifies Local Landscape Character Areas (LLCAs) within and adjacent to the site. The assessment has been undertaken in accordance with guidance contained in Natural England's publication 'An Approach to Landscape Character Assessment', October 214, with key characteristics, features and factors identified and assessed for each of the LLCAs.</p> <p>The LVIA also considers published landscape character assessments (both the National Character Areas and Suffolk Landscape Character Assessments) and the AONB Management Plan and associated strategies and policies.</p>
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.	Landscape	<p>The LVIA includes an assessment of both landscape and visual effects, including consideration of physical effects relating to changes in topography, land use and vegetation / landscape features.</p> <p>The proposed viewpoints to be used within the assessment have been agreed with SCDC (as set-out in the letter to Ben Woolnough of 10th January 2017 (ref. 10317_R02_RH_HM). _HM</p>
The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies.	Landscape	<p>Using the landscape character assessment and baseline (see detailed above in relation to local character areas), the LVIA undertakes an assessment of the potential impacts of the development proposals upon the landscape character and features.</p> <p>This will use recognised methodologies, with the LVIA having been undertaken in accordance with guidance contained in Guidelines for Landscape and Visual Impact Assessment, Third Edition published by the LI and IEMA (GLVIA3).</p> <p>The assessment takes account of the value of the landscape and its susceptibility to the proposed changes when identifying sensitivity. The magnitude of change and resulting significance of effects have been assessed using recognised methodologies and the EIA process.</p>
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.	Landscape	<p>The proposals incorporate substantial areas of open space, including the retention of boundary planting and the provision of landscape buffers providing a soft transition with adjacent countryside.</p> <p>To the east, where the site affronts the adjacent AONB and open countryside, the scale, density, layout and character of development will reflect the character of surrounding villages, providing a rural settlement edge. The boundary treatment will incorporate native hedgerows and trees to reflect the typical field boundaries, softening the settlement edge and providing glimpsed views of housing beyond. Outward views towards the AONB from PRow's will also be retained from within areas of informal public open space at the transition with the open countryside.</p> <p>To the west of the application site, the proposals have been designed to reflect the higher density, urban edges and larger scale buildings formed by Adastral Park and the A12 corridor.</p>
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.	Landscape	See points above r.e. character and distinctiveness.
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.	Cumulative	See above in relation to "WPC Cumulative Response".
The assessment should refer to the relevant <a href="#">National Character Areas</a>	Landscape	All published landscape character assessments within the local area are included within the Landscape chapter, including the National Character Areas.

		As set-out above, this complies with guidance contained in the GLVIA3.
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.		Noted.
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.	Socio-ec	Green Infrastructure Policy was reviewed as part of the socio-economic assessment. The Proposed Development will retain existing footpaths and create new rights of way to improve connectivity both within the Site and to the north and west to existing communities and other green and open spaces.
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 National Trail.	Socio-ec	Effects on access land are considered in the ecological assessment. Public open land, Public Rights of Way, the England Coast Path, National and Regional Trails have been described in the baseline section of the assessment and likely effects assessed. A Footpath/Cycleway/Bridleway Statement has also been prepared to accompany the application
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.	Socio-ec	The Footpath/Cycleway/Bridleway Statement for the Proposed Development includes reference to the ROWIP and has been referred to in the socio-economic assessment as appropriate.
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.	All	Noted.
The assessment should take account of the risks of air pollution and how these can be managed or reduced.	AQ	A full commentary on baseline assessments, impact and mitigation is provided within the ES.
The <a href="#">England Biodiversity Strategy</a> 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.	Ecology	Covered in ES chapter.
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.	Ecology	Covered in ES chapter.
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.	Cumulative	All aspects of the proposed development to include associated infrastructure improvements are included in the LVIA.
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, i.e. 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.	ALL	See above in relation to "WPC Cumulative Response".
<b>Suffolk County Council</b>		
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.	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.
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.	Archaeology	Noted.
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.	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.
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).	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.

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.	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.
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.	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.
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.	Archaeology	Discussion took place with Historic England as part of pre-application consultation. In response to Historic England's comments, Broadway Malyan prepared revisions to the illustrative framework plan, and the heritage park layout. As discussed in the chapter, mitigation measures to be employed include the erection of hoardings to protect the Scheduled Monument to the west of the site during construction, and creation of buffer zones around the scheduled monuments and non-designated heritage receptors at operational stage. Additionally, it is anticipated that there will be a site-wide landscape management strategy/ plan with areas, such as the proposed heritage park and central lake and heath, having detailed sections to ensure delivery of a high standard of design for these areas.
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).	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.
The EIA should include proposals for outreach and enhanced public understanding, and reference to this in the Scoping Report is welcome.	Archaeology	Noted & actioned in the archaeological DBA and Archaeology and Cultural Heritage ES chapter.
Whilst the principle of the development has been allowed for, any viable mineral resource that is not to be extracted would need to be sourced elsewhere to meet demand and this should be reflected in the EIA.	Minerals Resources	Brett Aggregates are to remain on the site for a time to continue to extract all viable minerals.
The scope for mitigation of this impact could be the potential for mineral resources to be used on site during construction. Furthermore, the functioning of any sustainable urban drainage systems may be linked to the need for the mineral resources to remain in situ.	Minerals Resources	Onsite construction and drainage will utilise the existing mineral resources where applicable. Detailed engineering through reserved matters will determine the optimal solution.
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.	Transport	All existing pedestrian, cyclist and equestrian crossing points both within and external to the site are discussed within the Transport Assessment. Further, proposals for enhancement or new pathways/crossing facilities are also set out in this report.
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.	Recreation, Open Space, Rights of way	All existing pedestrian, cyclist and equestrian crossing points both within and external to the site are discussed within the Transport Assessment. Further, proposals for enhancement or new pathways/crossing facilities are also set out in this report.
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.	Socio-Ec	Health and wellbeing including access to green space, community facilities, activity and healthcare facilities, is addressed in the socio-economic assessment. Health effects due to air quality are also considered in the air quality chapter.
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.	Socio-Ec	The Joint Strategic Needs Assessment and the Health and Wellbeing Strategy documents have been reviewed as part of the socio-economic assessment and relevant information included where appropriate. The Proposed Development provides improvements to pedestrian and cycle routes and creates significant new areas of accessible green space.
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.	Water	Anglian Water have confirmed that potable water supply is viable to the site. Anglian Water have also confirmed a nearby point of connection and moderate improvements to the existing sewer network to accommodate foul water.  The Flood Risk Assessment also provides evidence on how water quality will be improved via the use of site wide SuDS.



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).	Transport	Noted. Transport, Air Quality and Noise are all assessed within the ES.
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.	Transport	The Transport Assessment contains sections dedicated to the delivery of sustainable transport modes.
Travel Planning will be part of the TA. The promotion of active travel is likely to have associated and positive health impacts.	Transport	Agreed. A Travel Plan is included within the Transport Assessment.
As set out in the scoping report the baseline should include the Suffolk Landscape Character Assessment 2008/11 <a href="http://www.suffolklandscape.org.uk">www.suffolklandscape.org.uk</a> . 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.	LVIA	The Suffolk LCA has been included within the baseline for the LVIA and, where relevant key characteristics, features, sensitivities and guidelines / strategies are considered within the assessment.
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 <a href="http://www.suffolkcoastandheaths.org/about-us/aonb-management-plan/">http://www.suffolkcoastandheaths.org/about-us/aonb-management-plan/</a>	LVIA	Noted. The current plan is referenced within the LVIA.
Furthermore the Special Qualities of the AONB have been set out in detail and published; <a href="http://www.suffolkcoastandheaths.org/assets/About-Us/V1.8Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf">http://www.suffolkcoastandheaths.org/assets/About-Us/V1.8Natural-Beauty-and-Special-Qualities-of-the-Suffolk-Coast-and-Heath....pdf</a>	LVIA	The LDA Special Qualities document is referenced within the LVIA where relevant to the local landscape context, setting of the AONB and the proposals.
Any Photo-montages should be prepared in accordance with Landscape Institute Advice Note11/01 or its updates.	LVIA	Verified photomontages have been prepared to support the application, as agreed with SCDC (see attached letter to SCDC).
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.	LVIA	The LVIA Study Area, viewpoints and photomontage locations have been agreed with SCDC.
A detailed methodology for the LVIA should also be finalised and agreed with the LPA prior to the work being carried out.	LVIA	The LVIA methodology and approach, as set-out in the Scoping Report and subsequent letter has been agreed with the LPA.
The LVIA should clearly assess the proposal, identifying residual impacts in <i>both</i> visual and landscape terms.	LVIA	THE LVIA gives full consideration to both landscape and visual impacts.
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, <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf</a> within a Heritage Assessment.	LVIA	Noted and agreed.
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.	Ecology	Covered under the sHRA.
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 <sup>1</sup> (e.g. overwintering Avocet) nor the features of the Deben SSSI <sup>2</sup> (overwintering wildfowl and waders). This issue is an important theme covered in the Deben Estuary Plan (see <a href="http://www.debenestuarypartnership.co.uk">www.debenestuarypartnership.co.uk</a> ).	Ecology	As above.
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.	Ecology	CWS is covered within the ES chapter.
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.	Ecology	As above.
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.	Waste	The solution of waste management will be discussed and agreed through the application process. A Section 106 Contribution for the management of waste may be required; any measures to be delivered are subject to request of the Local Authorities.
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. 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. Recent modifications have been made to the site to better manage the increase in site usage but further modifications	Waste	The solution of waste management will be discussed and agreed through the application process. A Section 106 Contribution for the management of waste may be required; any measures to be delivered are subject to request of the Local Authorities.

<sup>1</sup> See <http://jncc.defra.gov.uk/default.aspx?page=2023>

<sup>2</sup> <https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1006262.pdf>

on this site to accommodate more households are not possible without significant investment.		
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.	Socio-economic	The Northern Quadrant has been considered as one of the developments in the cumulative assessment.
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.	Socio-economic	The scale of the accommodation is provided in the Project Description. Mitigation for existing businesses is provided through the CEMP and Community Engagement Plan. The year of 2032 has been taken as the year of assessment for the completed operational development, however, the school would be constructed in the first phase of development so jobs associated with this employment use would be available earlier.
The study area (para. 13.5.2) of 3km does not appear to be sufficient to properly assess impacts locally.	Socio-economic	The study area has been expanded to an area of 5km radius around the site to make sure Kesgrave and Woodbridge were also included. Information for the wider district and county areas was also considered where appropriate.
Suffolk Fire & Rescue Service (SFRS) has considered the proposal and do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change.	Services	Noted.
As always SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but in incorporated into the design/build stage it is extremely cost effective/efficient.	Services	Noted.
SFRS will not have any objection regarding access, if access is in accordance with building regulation guidance. There will need to be adequate water supplies and hardstanding for firefighting, specific information as to the number and location can be obtained from the SFRS.	Services	Noted.

## Appendix: Sustainable Drainage Systems (SuDS)

1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
  2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination.
  3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hardstanding, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
  4. The maximum acceptable depth for infiltration SuDS is 2.0m below ground level, with a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
  5. Deep bore and other deep soakaway systems are not appropriate in areas where Groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
  6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C69, 2007), the Susdrain website (<http://www.susdrain.org/>) and draft National Standards for SuDS (Defra, 2011)
- For further information on our requirements with regard to SuDS see our Groundwater Protection: Principles and Practice (GP3 v.1.1, 2013) document Position Statements G1 and G9 – G13 available at: <https://www.gov.uk/government/publications/groundwater-protection-principlesand-practice-gp3>