



Phase 2

Planning Statement

(including Affordable Housing Statement and s016 Heads of Terms)

Land North-East of Humber Doucy Lane, Ipswich

On Behalf of

Barratt David Wilson and Hopkins Homes

February 2024

Our Ref: 23109

Phase 2 PLANNING & DEVELOPMENT LIMITED

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Quality Assurance

Site Name: Land north-east of Humber Doucy Lane, Ipswich

Client Name: Barratt David Wilson Homes and Hopkins Homes

Type of Report: Planning Statement

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Appendix 1 – Assessment of the Proposals Against Development Management Policies

1. Introduction

- 1.1 This Planning Statement has been prepared by Phase 2 Planning and Development Ltd on behalf of the applicants, Barratt David Wilson and Hopkins Homes, in support of an Outline Planning Application for residential development and associated infrastructure/non-residential floorspace on land to the north-east of Humber Doucy Lane, Ipswich.
- 1.2 The applicants have come together as joint landowners to produce a comprehensive masterplan for this Site. Barratt is the nation's leading housebuilder and two of their brands, Barratt Homes and David Wilson Homes, will be providing homes at the site alongside Hopkins Homes, the largest privately owned housebuilder in East Anglia.
- 1.3 The Application Site straddles the local planning authority boundaries of Ipswich Borough Council and East Suffolk Council and is allocated in both the adopted Ipswich Local Plan and the Suffolk Coastal Local Plan as a cross boundary allocation to meet local housing needs on the edge of the Ipswich urban area. This application is submitted to ensure that this cross-boundary allocation can be planned and comprehensively delivered in a timely manner, making a positive contribution towards local housing need.
- 1.4 The full description of development is set out in Section 3 of this Statement, but in brief, the proposal includes up to 660 new homes alongside the provision of associated non-residential uses, open space and other relevant infrastructure.

Purpose and Structure of this Report

- 1.5 The purpose of this report is to draw together the main planning issues in the consideration of this proposal.

Planning Application Plans and Documents

- 1.6 A full schedule of the drawings and documentation being submitted as part of this application is set out on the separate covering letter prepared by Phase 2 Planning.
- 1.7 As the application is in Outline it does not contain details of the layout of the development, or details of buildings. The scope of the application is however set out by a series of "Parameter Plans" which covers matters such as the overall disposition of development parcels and open space, the principles for access and movement, and the overall scale and density of the development. In addition, full details have been provided for the means of vehicular, cycle and pedestrian access into and out of the site (but not details of access arrangements within the site). Section 3 of this Statement provides further details.

Planning History

- 1.8 The site has not previously been subject to any major planning applications. Part of the site, adjacent to Ipswich Rugby Club, has been the subject of a series of temporary permissions for use for playing field purposes, but the most recent of these expired several years ago (we discuss this matter further in Section 5 of this Statement). There are therefore no lawful uses on any part of the site at the moment, other than agriculture.
- 1.9 Westerfield House, which adjoins the site, has been the subject of a number of permissions in recent years, most notable for the erection of a care village (reference 18/00526/OUT) including up to 147 assisted living/extra care units and two staff/director dwellings. This permission is in the process of being implemented.
- 1.10 Ipswich Garden Suburb (Formerly known as the Northern Fringe) is the largest strategic allocation in Ipswich Borough and comprises three neighbourhoods. It is set to provide around 3,500 dwellings, a district centre and two neighbourhood centres, a country park, a secondary school and three primary schools along with primary road infrastructure. The Henley Gate neighbourhood is currently in the process of being constructed, consent is in place for the Fonnereau Neighbourhood, and there is a pending application for the Red House Park Neighbourhood.
- 1.11 Where relevant, the documentation submitted in support of this application takes into account the cumulative impact of these other known developments.

Pre-Application Engagement and Public Consultation

- 1.12 The proposals have been the subject of pre-application discussions with Ipswich Borough Council, East Suffolk County and Suffolk County Council in the form of topic workshops and pre-application meetings. These discussions have helped to shape the proposals for the site. This Statement addresses the matters raised during these pre-application discussions and identifies how they have been addressed within the application.
- 1.13 The proposed development has also been the subject of public consultation, and engagement with local bodies such as Rushmere St Andrew Parish Council. The separate Statement of Community Involvement prepared by Concilio summarises the feedback that has been received, and how the proposals have responded.

2. Site and Surroundings

- 2.1 The area of land the subject of this planning application relates to three parcels of land adjacent to the existing built-up area, around 3 km to the north-east of the town centre. The parcels are all situated off Humber Doucy Lane and total 31.52ha. The extent of the Application Site is as shown by the land edged red on the Site Location Plan submitted in support of this application, an extract of which is shown in Figure 2.1 below.



Figure 2.1: Planning Application Site Boundaries

- 2.2 The main area comprises a single large field that fronts onto Humber Doucy Lane, and a separate smaller field on the north side, which fronts on to Tuddenham Road, the two being divided by a tree lined public right of way (which also provides access to Lacey's Farm and Allen's Farm, to the east). This parcel falls partly within Ipswich Borough and partly within East Suffolk, but there is no physical boundary on the ground. The smaller field on the northern side (sometimes referred to as the Strawberry field from a previous 'pick your own' use) is broadly triangular in shape and bordered to the north by the railway line.
- 2.3 The second largest parcel lies to the south-east of the main parcel, and also has a frontage to Humber Doucy Lane. It is bounded to the east by Seven Cottages Lane, which leads to Tuddenham Lane and Lambert's Lane. This parcel is partly in agricultural use, and partly in use

as additional playing pitches for the adjoining Ipswich Rugby Club (albeit as noted previously, consent for playing pitch use has actually expired). The access to the Rugby Club separates the main parcel from the south-eastern parcel.

- 2.4 The third and smallest parcel is located on the western side of Humber Doucy Lane, to the south of the junction with Tuddenham Road. This parcel forms part of the application site in case there is any requirement to undertake highway improvements at the Humber Doucy Lane/Tuddenham Road junction. In the event that no highway works are required, this parcel would remain unchanged.
- 2.5 It is relevant to note that the application site covers the majority of the cross-boundary allocation, with the exception of a rectangular parcel of land fronting onto the south side of Humber Doucy Lane, which is not within the control of the applicants.
- 2.6 The characteristics of the site in terms of landform and vegetation are described in more detail in the separate Landscape and Visual Impact Assessment and Arboricultural Assessment, and so are not repeated here.
- 2.7 Similarly, the ecological characteristics of the site are set out in more detail in the separate ecological assessment and in the baseline Biodiversity Net Gain assessment in terms of existing habitats, and so is not repeated here.
- 2.8 The site is well-located in terms of access to existing bus services and local facilities, with local schools and services within walking and cycling distance, as set out more fully within the separate Transport Assessment.

3. The Proposed Development

- 3.1 This planning application seeks outline Planning Permission for up to 660 homes with associated non-residential floorspace, open space, and relevant infrastructure, as described in more detail below.

Format of the application

- 3.2 The Outline application is submitted on the basis of all matters of detail (defined as Access, Appearance, Landscaping, Layout and Scale) being reserved for subsequent approval.
- 3.3 The partial exception to this is the means of vehicular, pedestrian and cycle access between the site and surrounding areas, for which full details have been provided. Because the application does not provide any details for access within the site, however, "Access" is still technically a Reserved Matter, as only partial details are provided with the application.

Description of Development

- 3.4 Based on the above, the description of development reads as follows:

"Hybrid Application - Full Planning Permission for the means of external access/egress to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works."

Parameter Plans

- 3.5 In addition to the formal description of the development, which sets the upper limit for the quantum of development, the proposed development is further defined by a series of Parameter Plans, which help to provide further definition and clarity on the proposed form of development. There are eight Parameter Plans, covering Land Use, Density, Building Heights, Pedestrian Movement, Cycling Movement, Public Transport, Access and Vehicular Movement, and Green Infrastructure.
- 3.6 Together, these Parameter Plans define:
- (a) The location of development within the overall application site boundary;
 - (b) The location for non-residential development and the location for residential development;

- (c) The height and density of development;
- (d) The overall extent of land to be used for open space, landscaping, surface water attenuation and other 'green infrastructure';
- (e) The principal routes of movement for vehicular and non-vehicular traffic (which overlap the areas designated for development and green infrastructure).

3.7 The Parameter Plans are submitted as application plans for approval. Once approved, and subject to the limitations expressed on the plans, they form the framework within which subsequent applications for detailed development are prepared and considered.

Detailed Highway Plans

3.8 The detailed plans submitted in respect of vehicular, pedestrian and cycle access cover all of the exterior links between the Site and the surrounding area. There are several reasons why this aspect of the proposed scheme is being treated in detail rather than Outline, with key considerations being:

- As a result of pre-application public consultation, the means of access to the site was regularly raised as a matter of chief interest, and therefore it is considered that providing detailed designs would assist in providing maximum clarity on what is being proposed;
- The means of vehicular access to the site was also a major topic of discussion with the relevant Local Planning Authorities and Highway Authority at pre-application stage, during which a number of options were considered. Since accessibility for public transport, walking and cycling (as well as other vehicles) is a key component of successful place making, providing full details was again considered helpful to the assessment of the proposal;
- By fixing the points of access at this stage, it will make the process of producing detailed designs for Reserved Matters smoother, as one of the key variables to design will have been fixed;
- As noted by East Suffolk in particular at pre-application stage, defining the means of pedestrian access to the wider network of footpath links beyond the site helps to ensure that the importance of these connections is not overlooked at the Outline stage.

3.9 The detailed plans for the various external connections are shown in a series of drawings produced by the Applicant's engineering consultant, RSK. The plan referenced 890695-RSK-ZZ-XX-DR-C-0001-P02 with the file name "Proposed Access Strategy Sheet 1" provides an

overview of the locations for access, and gives the reference of the relevant plan to view for full details for each location (Sheets 2 to 6).

- 3.10 In the interests of clarity, all vehicular access is proposed to be taken from Humber Doucy Lane or Tuddenham Road (the latter for the northern field only). There will be no vehicular access from Tuddenham Lane or Seven Cottages Lane.

The key components of the development

- 3.11 An explanation of each of the key elements of the proposed development is set out below.

The Residential Development

- 3.12 The application seeks consent for up to 660 new homes, which will comprise a combination of market homes for sale and affordable housing.
- 3.13 Excluding the mixed-use area, the development parcels shown on the Land Use Parameter Plan total 18.86 ha (which is 60% of the overall site area). At an average of 35 dwellings per hectare (the minimum density prescribed in the adopted Ipswich Local Plan), this would provide the 660 new homes applied for.
- 3.14 In fact, the capacity of the site is considered to be slightly higher than 660, as the Density Parameter Plan shows the central area of the site adjacent to the central open space and mixed-use area as being suitable for an average of 40 dwellings per hectare, and in addition, it is considered that a further 15 or so homes could be provided on upper floors within the mixed-use area, above any retail/community floorspace.
- 3.15 The overall capacity of the site is therefore considered to be in the order of 690 homes. However, not every parcel would necessarily be developed to its maximum capacity, and therefore a more conservative approach has been taken, with the maximum number of homes set at up to 660.
- 3.16 We are aware of course that the two Local Plan allocations suggest a scale of development of circa 600 homes. Policy ISPA4.1 of the Ipswich Local Plan states that 60% of the site area is allocated for development, and 40% for secondary uses. With an overall site size of 23.28 hectares within the Ipswich area, this would equate to 14 ha of housing land, which at an average density of 35 dwellings per hectare, results in 490 dwellings within the Ipswich area, not the 449 referred to in the Policy. In addition to the circa 150 homes in the associated East Suffolk policy, therefore, the combined total of the two Policies is actually circa 640 homes rather than 600. With the ISPA 4.1 figure properly corrected, the proposed scale of development in this application at 660 units is very close to the policy level of circa 640.
- 3.17 The affordable housing requirement within Ipswich Borough is 30%, and within East Suffolk, 33%. At this stage, in the absence of a detailed layout for the site, the split between the number of properties that will be subject to 30% provision and the number subject to 33%

provision is not known, and therefore the definitive number of affordable housing units is not fixed.

- 3.18 However, assuming an average of around 31% affordable housing across the whole site (because more of the homes will be within Ipswich than within East Suffolk), the number of affordable homes to be provided would be of the order of 200.
- 3.19 The tenure of the affordable housing is also not fixed at this stage, and is a matter that we would expect to be discussed and agreed as part of the s106 Agreement in the event that planning permission is granted. Typically the affordable housing would comprise a mixture of rented and 'intermediate'/home ownership tenures.
- 3.20 Again, because the application is in Outline, the size of properties is not being set as part of this application, and would be a matter for detailed design in due course. However, it is expected that the development would comprise predominantly of 2, 3 and 4 bedroom properties of varying size and design, with a much smaller proportion of 1 and 5 bedroom properties.

Non-Residential Development

- 3.21 The non-residential element of the scheme is proposed to be located within the area labelled as 'mixed-use' area on the Land Use Parameter Plan, close to the centre of the site and adjacent to the central open space.
- 3.22 The non-residential elements comprise two main components. Firstly, the proposal includes for the provision of an Early Years Nursery. The scheme would be likely to generate an additional 57 pre-school age children. A new on-site building would be provided within the mixed-use area, and we understand that this would require a site of 0.22 ha to accommodate the facility.
- 3.23 The second element of non-residential built floorspace would comprise uses within Class E and/or F2(b) (e.g. potentially a small-scale retail use, café, service use and/or community use). The proposed floorspace of up to 400 sq m net is intended to provide sufficient space for a small-scale retail use alongside space for other 'local centre' or community uses, at a scale that would not compete or undermine the vitality of the Selkirk Road local centre.
- 3.24 If the Council were to decide that only part of the proposed 400 sq m should be used for retail purposes, then it would be open to it to limit the size of the retail element by condition.
- 3.25 The two elements of non-residential use are purposely co-located, and set in the centre of the site next to the central open space, to form a clear 'heart' to the development, to provide a focal point for community activity, and to maximise the opportunity for walking and cycling to local facilities for residents.

Access

- 3.26 The principal location for vehicular access to the development will be Humber Doucy Lane. This accords with the wording in Policy SCLP12.24, which specifically refers to the primary access being from that road. A second means of vehicular access, serving the northern field only, is proposed from Tuddenham Road. No vehicular access to the development is proposed from Tuddenham Lane or Seven Cottages Lane.
- 3.27 To facilitate access and manoeuvring for busses, in addition to the main vehicular access to the site, a second access for busses only is proposed. The main vehicular access is located opposite Inverness Road, the bus-only access is located opposite Sidegate Lane. In both cases the location of the junctions avoids any disruption to crossovers serving existing properties, and avoids any adverse impact on existing mature trees along Humber Doucy Lane.
- 3.28 Pedestrian and cycle access would also be available via Humber Doucy Lane. In order to avoid conflict with traffic (whilst protecting the existing hedgerow on Humber Doucy Lane), a segregated cycle and pedestrian route is proposed within the site, running parallel to Humber Doucy Lane. Crossing points to Humber Doucy Lane are to be provided at both the main access and the bus access, to help with safe onward journeys for non-vehicular modes of travel.

Green Infrastructure and Open Space

- 3.29 As shown on the Open Space Typology Plan and explained further in the Design and Access Statement, the proposed development provides a range of different types of 'green infrastructure', designed to cater for a variety of different recreational activities.
- 3.30 The Open Space Assessment identifies a surplus of space in the local area for allotments and playing fields, but a shortfall in terms of play space, youth space and parks/gardens. The proposed Open Space typology therefore ensures that the provision of play space and youth space meets (and indeed exceeds in terms of youth) the relevant open space standards for a development of this scale. As explained in the Design and Access Statement, the shortfall in Parks/Gardens space is substantially exceeded by the significant surplus in amenity and semi-natural greenspace, which it is considered is a more appropriate typology for this 'edge-of-town' location.
- 3.31 The overall quantum of green infrastructure/open space is over double the standard policy requirement.

Drainage and Utilities

- 3.32 The separate Flood Risk Assessment/Drainage Strategy sets out the means by which surface water is to be managed. Conveyance of water across the site will be undertaken primarily via swales, and surface water will be attenuated in designated areas before discharging to the ground through shallow infiltration.

- 3.33 The principal changes in terms of utilities will be the installation of additional on-site substations, and the provision of a foul pumping station to transfer flows to the off-site foul drain in Humber Doucy Road.

4. Planning Policy

Introduction

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 The currently adopted relevant statutory development plan document for the part of the site falling within Ipswich is the Core Strategy and Policies Development Plan Document Review 2018-2036 (Adopted in March 2022) and the associated Policies Map. The adopted Local Plan covering the part of the site that falls within East Suffolk District is the Suffolk Coastal Local Plan which covers the period up to 2036 (Adopted in September 2020). In addition, the site partially lies within the Rushmere St Andrew Neighbourhood Plan area, which is covered by a Neighbourhood Plan (Made in June 2023).
- 4.3 Both adopted Local Plans recognise the need for new housing to meet the needs of the Ipswich Housing Market Area, which has been identified as 35,445 dwellings during the period 2018-2036. The Plans identify the Application Site as a suitable location for development.

National Planning Policy

- 4.4 The National Planning Policy Framework was most recently updated in December 2023 and sets out the Government's planning policies for England and how they should be applied. Key themes relevant to the proposals include, but are not limited to, achieving sustainable development, effective cooperation, delivering a sufficient supply of homes, making effective use of land, good design, promoting healthy and safe communities and sustainable transport.
- 4.5 Paragraph 11 identifies that plans and decisions should apply a presumption in favour of sustainable development which for decision-taking means *"approving development proposals that accord with an up-to-date development plan without delay..."*

Site Specific Development Plan Policies

- 4.6 The Policies Map for Ipswich shows the site as all falling within Policy ISPA4.1, which is covered under Policy ISP4A: Cross Boundary Working to Deliver Sites. The part of the Site falling within East Suffolk is allocated under Suffolk Coastal Local Plan Policy SCLP12: Land at Humber Doucy Lane. In addition, Policy RSA 2 of the Rushmere Neighbourhood Plan relates specifically to this Site.
- 4.7 These policies require development to comply with a number of criteria. Table 5.1 below provides a summary of the proposals against the criteria contained within these three site specific policies:

SITE SPECIFIC POLICY REQUIREMENT – ISPA4	RESPONSE
60% to be allocated for housing, 40% for secondary uses.	Although the policy refers to this split being achieved within the Ipswich area, pre-app discussion with IBC/ESC confirmed that for Masterplanning purposes, the site should be treated as a single entity. The 18.86 ha of housing land shown on the Land Use Plan comprises 60% of the site area, the remaining 40% of the site area is therefore available for secondary uses (this includes the non-residential floorspace).
Development to be planned and comprehensively delivered.	The site is being planned comprehensively (with the exception of the small independent parcel of land on the west side of Westerfield House) and will be delivered comprehensively by the joint Applicants. Pre-application has been jointly carried out with IBC and ESC.
Criterion (a) - High quality design with a mix of housing to be determined	Details in relation to housing mix and design will be determined at reserved matters stage, however it is anticipated that the development will provide a wide mix of house types of different sizes, aided by the fact that the applicants represent 3 different house builders (Hopkins/Barratts/David Wilson). The main design principles are set out in the Design and Access Statement.
Criterion (b) - Settlement separation	Separation between Ipswich and surrounding settlements is ensured by the 'green edge' to the development, which incorporates the Green Trail, drainage, and other areas of open space and landscaping.
Criterion (c) – Preservation of the setting of listed buildings and non-designated heritage assets	The Heritage Impact Assessment explains how the disposition of open space, buffers and form of development provides for the preservation of the setting of nearby listed and non-listed heritage assets.
Criterion (c) - Archaeological assessment required.	An archaeological assessment is provided.
Criterion (d) - Site specific Flood Risk Assessment required.	A site-specific FRA is provided.
Criterion (e) - Preservation of TPO trees along unless overriding reasons for removal	The TPO trees are not affected by the application, with a suitable green buffer to Westerfield House provided.
Criterion (f) (i) - Provision for primary school places and an early years setting to meet need created by development (early years setting identified as 0.1ha in SCLP)	The application includes provision for a 60 place early years setting. A contribution will be provided in order to meet the requirement for additional primary school places generated by the development.
Criterion (f) (ii) - Replacement sports facilities, if required, and other open space	The Open Space Assessment submitted with the application identifies a significant surplus of sports pitches in the local area. It also explains that there is no lawful use of the site for playing fields, the existing consent having expired, and in any event, usage was heavily restricted (just 2.5 hours per week). The quantum of 'other open space' is over twice the required policy standard.
Criterion (f) (III) - Project level Habitat Regulations Assessment and Suitable Alternative Natural Greenspace (SANGs)	A Shadow HRA report is provided, which explains how recreational pressure can be mitigated through three main strands of mitigation, being (1) on-site open space and walking routes (2) connections to a wide local network of alternative green space on adjoining land and (3) facilitating existing residents accessing greenspace for recreational walking via the new connections provided within the site.
Criterion (f) (iv) - Take account of Ipswich Wildlife Audit (2019) recommendations and positive enhancements of strategic infrastructure on and off site, 10% biodiversity net gain and a soft edge	The ecological assessments submitted with the application explain how ecological enhancement can be provided within the application site boundary. The 10% net gain requirement is now statutory under the Environment Act, and again, the

to the urban area where it meets the countryside, contribution towards creation of 'green trail'	information provided with the application explains how this can be met overall (by a combination of on and off-site provision).
Criterion (f) (v) – Transport measures including junction improvements for Humber Doucy Lane and Tuddenham Road, walking and cycling infrastructure, public transport, and transport mitigation.	Highway matters are covered in the separate Transport Assessment. The application site includes land for revisions to the HDL/Tuddenham Road junction, if required, it includes walking and cycling infrastructure and appropriate points of connection to the existing network, and provides for bus access into the development. Any off-site mitigation will be a matter for discussion and agreement through the s106 process, once the findings of the TA have been assessed.
Criteria (f) (vi) and (vii) - Phased and delivered in co-ordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity.	It has subsequently become apparent that there is a surplus of primary school places in the local area, so much so that SCC have recently decided to reduce capacity of Rushmere Hall School as there were insufficient pupils.
Criterion (f) (viii) – Opportunity for convenience retail on site.	The proposals for the site include for up to 400 sq m of Class E/F2(b) floorspace, which would be suitable for a small scale retail operator. At this scale, and given the only other facility in the local area is the Co-Op at Selkirk Road, the scale of the development would not impact on the viability of existing facilities (as set out in the separate retail assessment).
Criterion (f) (ix) - Financial contribution to off-site healthcare facilities	This would be delivered through the s106 agreement (see Heads of Terms section in this Statement).

Table 5.1: Assessment of the Proposals Against ISPA4 Site Specific Policy Requirements

SITE SPECIFIC POLICY REQUIREMENT – SCLP12.24	RESPONSE
A masterplanned approach in combination with land in the Ipswich area required.	The site is being planned comprehensively (with the exception of the small independent parcel of land on the west side of Westerfield House) and will be delivered comprehensively by the joint Applicants. Pre-application has been jointly carried out with IBC and ESC.
Criterion (a) - High quality design with a mix of housing to be determined	Details in relation to housing mix and design will be determined at reserved matters stage, however it is anticipated that the development will provide a wide mix of house types of different sizes, aided by the fact that the applicants represent 3 different house builders (Hopkins/Barratts/David Wilson). The main design principles are set out in the Design and Access Statement.
Criterion (b) - Site specific Flood Risk Assessment required.	A site-specific FRA is provided.
Criterion (c) - 0.1ha of land for an early years setting if needed	A combined site for 2 early years settings is provided.
Criterion (d) - Contribution to the creation of a 'green trail' around Ipswich and provision of on-site open space	The proposals incorporate the Green Trail, and other areas of open space and landscaping. See the Open Space Strategy within the DAS for details.
Criterion (e) - Sufficient primary school places	A financial contribution will be provided (see Heads of Terms in this Statement).
Criterion (f) – creation of a 'soft edge' through the provision of significant landscaping.	A 'soft edge' to the development is to be created through incorporation of the Green Trail, drainage, and other areas of open space and landscaping around the periphery.
Criterion (g) - Promotion of the use of sustainable modes of transport	The scheme incorporates a network of quality walking and cycling routes and makes provision for bus access into the site. A Travel Plan will be provided (see Heads of Terms section).

Criterion (h) An archaeological assessment will be required	An archaeological assessment is provided.
Criterion (i) – Preservation of the setting of listed buildings and non-designated heritage assets	The Heritage Impact Assessment explains how the disposition of open space, buffers and form of development provides for the preservation of the setting of nearby listed and non-listed heritage assets.
Criterion (j) - Project level Habitat Regulations Assessment required.	A Shadow HRA report is provided, which explains how recreational pressure can be mitigated through three main strands of mitigation, being (1) on-site open space and walking routes (2) connections to a wide local network of alternative green space on adjoining land and (3) facilitating existing residents accessing greenspace for recreational walking via the new connections provided within the site.
Development to be accessed by Humber Doucy Lane	The primary means of vehicular access is to be from Humber Doucy Lane.
Transport Assessment required, to identify improvements for Humber Doucy Lane and Tuddenham Road.	Highway matters are covered in the separate Transport Assessment. The application site includes land for revisions to the HDL/Tuddenham Road junction, if required.

Table 5.2: Assessment of the Proposals Against SCLP12.24 Site Specific Policy Requirements

Strategic Local Plan Policies – Ipswich and East Suffolk

- 4.8 **Strategic Infrastructure Priorities** are set out by both local planning authorities in Policies ISPA2 and SCLP2.2 (the priorities are the same in both). The proposed development will make appropriate contributions to strategic infrastructure priorities (e.g. education, health, walking and cycling etc) where such contributions meet CIL requirements (or in the case of East Suffolk, through the normal CIL contribution).
- 4.9 **Cross boundary mitigation of effects on Protected Habitats** is covered by ISPA3 and SCLP2.3, which commit to addressing the requirements of the Recreational Disturbance Avoidance and Mitigation Strategy and the implementation of mitigation measures for the benefit of the European protected sites around the Strategic Planning Area. The means by which the proposals address recreational disturbance is set out in the Shadow Habitats Regulations Assessment prepared by CSa.
- 4.10 **Affordable Housing** requirements for Ipswich Borough are set out under policy CS12, with ISPA4 identifying that the provision on this site should be at least 30%. SCLP5.10 states that one in three of the dwellings should be affordable. These policies go on to provide details in terms of tenure split. The application proposes a policy compliant level of affordable housing, with details in terms of numbers of units and tenures to be subject to agreement with the Councils in due course (see Section 6 of this Statement for further information).
- 4.11 **Open Space/Provision for Green Infrastructure Sport and Recreation** is covered by Policies CS16 and Appendix 3 of the Ipswich Local Plan and SCLP8.2 of the Suffolk Coastal Plan. These Policies seek to encourage the provision of new facilities and safeguard and protect the loss of existing facilities. Further consideration of the proposals against these policies and standards is set out within the Open Space Assessment that is submitted with the Application, and within the Open Space Strategy that forms part of the Design and Access Statement.

- 4.12 **Infrastructure Delivery** is covered under Policies CS17 and SCLP3.5. These policies require developments to meet the on and off-site infrastructure requirements needed to support developments and mitigated the impact of the development. SCLP3.5 recognises that off-site infrastructure will be generally funded by CIL, whilst the absence of CIL in Ipswich means that such contributions will be required to be provided via the Section 106 Agreement for Ipswich. The broad categories of contributions identified by CS17 are set out in Section 6 of this report.

Neighbourhood Plan Policy

- 4.13 The Rushmere St Andrew Neighbourhood Plan was ‘made’ in June 2023, with the designated area including a part of the site within the East Suffolk Authority area (the other part of the land within East Suffolk is in Tuddenham St Martin parish).
- 4.14 Policy RSA2 relates specifically to the Site, and requires “significant reinforcement of existing planting and additional native tree planting” to the boundary of the site adjoining Tuddenham Lane and neighbouring residential uses. The policy seeks to ensure separation between new development and the countryside beyond. The proposed development seek to achieve both objectives through the provision of open space and new planting within the ‘Green Trail’ area that forms the eastern boundary of the Site.
- 4.15 Policy RSA2 also provides that access from Tuddenham Lane and Seven Cottages Lane should be for pedestrians and cyclists only. The Parameter Plans and detailed access plans ensure that this would be the case.
- 4.16 Policies RSA3 and 4 relate to the protection of landscape character and retention of trees and hedgerows. The separate Landscape/Visual Impact Assessment and Arboricultural reports submitted with the application explain how the design of the scheme has responded to the local landscape and how trees and hedgerows are to be retained wherever possible (and supplemented with new planting).
- 4.17 The requirements of Policy RSA9 in respect of design will be more applicable at the detailed design stages.

Development Management Policies

- 4.18 As the proposed development is at this stage in Outline, many of the standard development management policies from both Councils are not yet fully applicable, as there are no details against which development management standards can be applied. However, there are policies, such as those on residential density and sustainable construction, that will be relevant in the determination of this application, whether because they are applicable to the form of development applied for, or whether because they relate to matters that would need to be conditioned or form part of any s106 agreement.
- 4.19 Consideration of the proposals against these policies is summarised in the table at Appendix 1, which presents a list of combined Ipswich and East Suffolk policies by topic area.

Supplementary Planning Documents

4.13 The following Supplementary Planning Documents have been taken into account during the preparation of this application:

- **Development and Flood Risk SPD (Ipswich)** – The FRA that accompanies the application provides an appropriate level of information for the site and circumstances.
- **Low Emissions SPD (Ipswich)** – A completed air quality cost calculation has been prepared by AQ Consultants as part of the Air Quality Assessment. The results indicate that the value of the proposed mitigation significantly exceeds the projected impact.
- **Suffolk Coast RAMS SPD (Ipswich and East Suffolk)** – This issue is covered in the Shadow Habitats Regulations Assessment.
- **Development and Archaeology SPD (Ipswich)** – This document does not appear to still be available, but the archaeological assessment prepared for the application has been undertaken following consultation with the Council's specialist advisors.
- **Public Open Spaces SPD (Ipswich)** – This document was used to inform the preparation of the Open Space Assessment that has been submitted with the application. At pre-application stage, a meeting was held with the Council's leisure services team who confirmed that the information contained in the SPD remains the most recent analysis of provision.
- **Cycling Strategy SPD (Ipswich)** – The principles of the cycling strategy have informed the proposals for the site. Any specific enhancements required would be matters to be considered in the s106 agreement.
- **Ipswich Urban Character Studies SPD (Ipswich)** – This document has been used to help inform the Design and Access Statement.
- **Local List (Buildings of Townscape Interest) SPD (Ipswich)** – Locally listed buildings and non-designated heritage assets generally have been taken into account in preparing the Heritage Impact Assessment.
- **Reptile Strategy SPD (Ipswich)** – Protected species surveys have been undertaken in accordance with appropriate practice. The guidance in this document will however be helpful going forward in terms of practical mitigation steps.
- **Affordable Housing (East Suffolk)** – This document will be used to inform the tenure and mix of affordable housing as part of the s106 agreement.

- **Sustainable Construction (East Suffolk)** – This document was used to inform the Energy and Sustainability Statement submitted with the application, as noted at paragraph 2.2.2 of that document.

5. Consideration of the Main Issues

5.1 This section of the report comments briefly on the main issues likely to be relevant to the determination of this Application. These are summarised as follows:

- i) The Principle of Development
- ii) Other Matters:
 - Highway access – vehicular and non-vehicular modes, including public transport
 - Highway impact
 - Air Quality
 - Open space and recreation
 - Drainage
 - Ecology and biodiversity
 - Heritage
 - Arboriculture
 - Landscape and visual impact
 - Noise and vibration
 - Archaeology
 - Impact on local services
 - Sustainable Construction
 - Construction Management

The Principle of Development

- 5.2 The application site is allocated for residential development in the relevant Local Plans. The principle of residential development is therefore established.
- 5.3 The quantum of residential development proposed is slightly higher, at 660 homes, compared to the figures quoted in the adopted policies, but that is primarily because the figure given in ISPA4 within the Ipswich Plan did not accurately reflect the yield that arises from having a minimum of 35 dwellings per hectare on 60% of the site area. In any event, making best use of development land is a key principle of National Planning Policy, and therefore irrespective of the calculations, it is appropriate that the number of homes delivered from the site should be the optimum compatible with local infrastructure, the environment, and the context.
- 5.4 The inclusion of Early Years accommodation on the site accords with both the Ipswich and East Suffolk policies. The provision of additional non-residential use is in accordance, in principle, with the Ipswich site specific policy, which encourages an element of on-site retail floorspace to help meet daily needs without the need for car travel.
- 5.5 In accordance with the Ipswich site-specific policy, the site provides 60% of the land area for housing development, and 40% for secondary uses. In accordance with the East Suffolk site-specific policy (and Ipswich policy), the proposals provide a 'soft edge' to the urban area, and a transition between the built development and the countryside beyond.

- 5.6 Section 4 of this Statement provides a fuller list of the policy requirements, but for the reasons above (and as set out in Section 4), the proposed development meets the terms of the site-specific allocations. As per Paragraph 11 of National Planning Policy, therefore, the starting point for determination is that planning permission should be approved, as expeditiously as possible.

Other Matters

Highway Access – vehicular and non-vehicular modes, including public transport.

- 5.7 As explained previously in this Statement, the means of connectivity between the site and the surrounding area is being applied for in detail. The details submitted show all of the means of vehicular access, and the means of pedestrian and cycle access.
- 5.8 Policy SCLP12.24 is clear that the development should be accessed from Humber Doucy Lane. As a result of pre-application discussion, consideration was given to access from Tuddenham Road, but this would not only have been contrary to the thrust of the policy, it also proved unachievable in any form other than providing access to the northern field only, for a limited scale of development. The scheme incorporates this limited access from Tuddenham Road, because it allows the northern field to be accessed without impacting on the tree lined public right of way which crosses the site.
- 5.9 In terms of access from Humber Doucy Lane, there are a number of constraints to the location of the vehicle access points, as set out in the separate Transport Assessment. The proposed location opposite Inverness Road avoids impacting on crossovers serving existing properties, avoids impact on the mature line of trees, avoids an access directly opposite an existing residential property, and, through the traffic light design, minimise impact on the existing frontage hedgerow for visibility.
- 5.10 A second point of access, for busses only, is also proposed for Humber Doucy Lane, opposite Sidegate Lane, where similar considerations apply (but the extent of visibility required is less). As shown on the Public Transport Parameter Plan, the bus access point leads into a bus route that loops through the site, thereby ensuring that all residents would have easy access to public transport. The principal of the route shown has been subject to pre-application consultation and we understand is considered appropriate.
- 5.11 Highway safety on Humber Doucy Lane was raised in pre-application consultation. The combination of a segregated route for cyclists and pedestrians within the site, coupled with the introduction of the crossing points at the two junctions, would assist in slowing traffic and providing safe routes for cyclists and pedestrians.
- 5.12 The south-eastern parcel is similarly served from Humber Doucy Lane, with segregated pedestrian and cycle connectivity provided within the site, and a single point of vehicular access from Humber Doucy Lane, provided at the bend of the road where visibility is maximised and impact on the existing hedge is minimised.

- 5.13 There is a network of cycle and pedestrian routes permeating the countryside to the north and east of the site. There are several points of connection between the site and these routes, some of which are existing (as rights of way already connect through both development parcels), and some of which are new connections, as shown on the Pedestrian Movement Parameter Plan.

Highway impact

- 5.14 The assessment of the proposed development on the highway network is set out in the separate Transport Assessment, and is not repeated here. The assessment shows however that the proposed development can be satisfactorily accommodated on the highway network. Measures to promote sustainable travel modes will help to reduce impacts.
- 5.15 The selection of the location and format for vehicular access to the site has been carefully considered, including in terms of having regard to minimising impacts on existing hedgerows (in particular to Humber Doucy Lane), maintaining the 'green corridor' character of Tuddenham Road, and ensuring safe and efficient access for residents.

Air Quality

- 5.16 An Air Quality Assessment has been undertaken in accordance with the EPUK/IAQM guidance 'Land-Use Planning and Development Control: Planning for Air Quality'. The assessment includes consideration of impacts at construction stage and relevant mitigation, it assesses the cumulative impacts of traffic from the development and other committed proposals, it assesses the air quality of the site in terms of suitability for future residents, and it undertakes an assessment of mitigation in accordance with Ipswich Council's supplementary planning document.
- 5.17 The assessment shows that there would be no material impact on air quality, that the site is suitable for residential use, and that appropriate mitigation measures are being included within the scheme to address air quality.

Open space and recreation

- 5.18 The application is accompanied by two documents which together explain the proposals for open space and recreation provision. The Open Space Assessment provides a review of the extent of existing facilities in the local area, based on the different typologies of open space defined by the Councils. It forms part of the evidence base which then underpins the proposed Open Space Strategy, which is included within the Design and Access Statement, and which shows how the various elements of 'green infrastructure' on the site can provide a range of open spaces, designed to meet the areas of greatest need.
- 5.19 The Open Space Assessment identifies a surplus of playing pitches and allotments within the local area. The priorities for provision on site are therefore for Parks space, children's play, and youth provision, where there are local shortfalls.

- 5.20 The open space analysis shows that, overall, compared to a total policy requirement of 5.12 hectares of open space (for 660 homes), the proposals provide 11.63 ha of open space. The surplus is made up predominantly of Natural and Semi-Natural Greenspace.
- 5.21 As explained in the Open Space Assessment, although the proposals will result in the loss of an area of land currently used by the Rugby Club, that land has only ever had a very limited use, and in fact no longer had planning permission for use. There is moreover a significant surplus of playing fields. It is not therefore proposed to be replaced on a like for like basis, but rather, the development will provide a different range of open spaces that will offer greater usage for a wider range of people. Alternative space for active sport will be in the form of the Multi-use games area, provided within the proposed development.

Drainage

- 5.22 The drainage strategy for the site has been the subject of pre-application discussion with the Lead Local Flood Authority, and is based on the sustainable principles of conveyance primarily be swales, on-site attenuation, and infiltration.
- 5.23 The dual use of open space (particularly natural and semi-natural open space as is primarily the case in this instance) for recreation and water management is very much supported in policy and guidance.

Ecology and Biodiversity

- 5.24 The separate Ecology reports explain how the proposed development seeks to manage the impact of the development at both the construction and operational stages (see for Table 3 of the Ecological Impact Assessment), and how, in addition to the wider benefit of 10% Biodiversity Net Gain, the proposals will be able to deliver a range of on-site ecological enhancement measures (see in particular the measures set out at paragraph 5.66 of the Ecological Impact Assessment).
- 5.25 Through a combination of impact management and on-site/off-site ecological enhancement, the proposed development can provide an overall benefit in terms of ecology and biodiversity.

Heritage

- 5.26 The separate heritage assessment explains how the layout of the site has been informed by heritage constraints, and designed to minimise the impact on the setting of both designated and non-designated heritage assets. The assessment concludes that impact on heritage assets is at the lower end of less than substantial harm.

Arboriculture

- 5.27 An assessment of the impacts of the development on existing vegetation is set out in the Arboricultural Impact Assessment. The development parcels shown on the Land Use Plan can be seen to have no impact on vegetation retention, whilst the means of access and movement into and around the site has been designed to minimise impact. For example, the traffic light controlled junction onto Humber Doucy Lane combined with the priority junction on Tuddenham Road has the least impact on the existing hedgerows of all of the options considered for access, whilst disturbance to vegetation elsewhere has been minimised to only that required for pedestrian and cycle connectivity.

Landscape and Visual Impact

- 5.28 The Landscape and Visual Impact Assessment prepared by CSA provides an appraisal of the impact of the proposed development on the surrounding area. Overall, that assessment notes that site is visually well contained by existing vegetation and built form, with views limited to “near distance receptors” (i.e. close views) where gaps in boundary vegetation allow. The retention of the majority of the existing boundary vegetation, alongside new planting, will assist in integrating the new development into the landscape, and would the layout of the scheme, with new housing set back from the boundaries and set within generous areas of open space.
- 5.29 The assessment concludes that the site is well related to the existing built-up area, that new housing would not be out of character, and whilst the new housing would be visible from near distance views from the north and east, it will generally be seen in the context of the existing built up area of Ipswich. Retained and enhanced vegetation will provide a robust boundary to the development edge, and will increasingly screen the new houses, as it matures.

Noise and Vibration

- 5.30 The Noise and Vibration report by 24 Acoustics demonstrates that site is suitable for residential development and not subject to any significant constraints from either road or rail noise (or vibration). Acoustic glazing and alternative ventilation may be required in some instances, but only to a limited number of properties, and such measures are standard.
- 5.31 The report also provides an assessment of the change in noise levels in the adjoining area by reason of additional traffic (including cumulative impact with other developments), and finds that the magnitude of change to fall within the “negligible” range when assessed against the relevant standards.

Archaeology

- 5.32 The archaeological assessment produced by RPS and submitted with the application has been informed by both desk-based analysis and the results of a geophysical survey. Based on these sources, the report concludes the potential for Late Prehistoric and/or Roman activity within

the site is high, whilst the potential for any other significant (i.e. non-agricultural remains) within the site is assessed to be low/negligible.

- 5.33 There is no suggestion that the site contains remains of archaeological interest that would be a constraint to development. However, it is expected that further archaeological investigation will be required, starting with trial trenching, and it is assumed that additional work would be subject to further agreement on the scope and timing.

Impact on local services

- 5.34 As the proposed development will lead to an increase in people living in the local area, it has the potential to impact on local services. Whilst recent decisions from the Education Authority have shown that there is currently a surplus of primary school places (hence the decision to reduce the capacity of Rushmere Hall), it is expected that the proposed development will make appropriate financial contributions towards any additional classroom space required, at primary, secondary and sixth form levels. The planned construction of three new primary schools and a new secondary school within the nearby Ipswich Garden Suburb shows helps to confirm that there will be sufficient opportunities across the north-eastern side of the town for school places.
- 5.35 In terms of health provision, the NHS typically seek a financial contribution to create additional capacity alongside major new housing development, and a financial contribution is anticipated in this instance.
- 5.36 An increase in population also means additional expenditure in local shops, and therefore it would also be expected that retailers and service providers in the local area would benefit from increase expenditure.

Sustainable Design and Construction

- 5.37 The report by JS Lewis provided as part of the application documentation explains that the compliance with the 2021 Building Regulations will ensure that the development exceeds the Local Plan policy target of 19% CO2 savings, set by Ipswich Borough Council. It explains that the renewable energy targets of 15% in the Ipswich Local Plan and 20% in the East Suffolk Local Plan can be met through the provision of heat pumps, with solar PV also likely to play a role.
- 5.38 Aside from building construction, the JS Lewis report identifies the various means by which the proposals contribute to wider sustainability objectives, including in respect of measures to reduce travel by car, sustainable drainage solutions, water efficiency measures, waste and recycling provisions, incorporation of green infrastructure, and biodiversity enhancement.

Construction Management

- 5.39 In the event of planning permission being approved, a Construction Management Plan would be produced and submitted for approval. The purpose of a Construction Management Plan is

to minimise the impact of construction activity on local residents, protect the local environment, and provide for appropriate health and safety measures.

- 5.40 Construction Management Plans may be prepared for different stages of the construction process, or be overarching for the whole process. Whilst not produced at this stage of the planning process (because they relate to matters of detailed operation), Construction Management Plans are an important component of successfully delivering new housing, and is a matter that we would expect to be conditioned for subsequent approval.

6. Heads of Terms and Affordable Housing Delivery Statement

S106 Heads of Terms

- 6.1 As with any major planning application, the development has the potential to create impacts on the environment and local services and infrastructure which, if not addressed, could have adverse impacts. The mitigation to avoid negative impacts can take many forms, for example the payment of financial contributions to other parties for increased service capacity, the direct provision of works off-site by a developer, or the provision of facilities on-site.
- 6.2 As identified in section 5 of this report, off-site infrastructure will be generally funded by CIL within East Suffolk, whilst the absence of CIL in Ipswich means that such contributions will be required to be provided via a Section 106 Agreement.
- 6.3 Ipswich Local Plan Policy sets out broad categories of infrastructure to be secured or financed from new development:
- i) Highways and transport, including measures to achieve modal shift;
 - ii) Childcare, early years and education;
 - iii) Healthcare including acute care and emergency services;
 - iv) Environment and conservation;
 - v) Community and cultural facilities including heritage and archaeology;
 - vi) Sport and recreation;
 - vii) Economic development; and
 - viii) Utilities.
- 6.4 The site-specific Local Plan policies also set out requirements, which can be summarised as follows:
- Provision of primary school places and an early years setting;
 - Replacement sports facilities (if required);
 - Provision of Suitable Alternative Natural Greenspace;
 - Transport measures:
 - Highway and junction improvements on Humber Doucy Lane and Tuddenham road;
 - Walking and cycling infrastructure to link the site to key destinations;
 - Public transport enhancements;
 - Appropriate transport mitigation measures that arise from demand created by the development;
 - Contribution towards off-site healthcare facilities; and
 - Affordable housing.
- 6.5 The above forms the starting point for discussions in relation to likely Section 106 provisions, which will be subject to refinement during the course of the planning application process. Any obligation sought is required to meet the tests set out in the Community Infrastructure Levy Regulations. Based upon the above and pre-application discussions, and taking into account

the material supplied with this application, it is envisaged at this stage that the Heads of Terms for any s106 agreement¹ would be likely to include:

- On-site Affordable Housing.
- Off-site contributions to additional school capacity – primary, secondary, and sixth form.
- On-site provision of Early Years.
- Off-site health contribution.
- Off-site libraries contribution.
- Public Transport Contribution.
- Off-site highway mitigation.
- Travel Plan.
- Off-site Recreational Avoidance Mitigation contribution.
- On-site open space management arrangements.
- On-site drainage management arrangements.
- Monitoring fees.

Affordable Housing Statement

- 6.6 With regard to affordable housing, the application proposes a level of provision in accordance with the respective Local Plan policies. As noted previously in this Statement, the exact number of units cannot be determined at this stage, as it is not known how many properties will fall within the East Suffolk part of the site (33% affordable housing requirement) and how many will fall within Ipswich (30% requirement). An estimate based on an aggregate of 31% across the site would be circa 200 affordable homes.
- 6.7 In terms of tenure mix, we would expect this to be informed through further discussion. Within East Suffolk, the Council's Affordable Housing SPD provides a starting point for considering an appropriate mix of tenures. At this stage, though, it is not possible to set a firm mix, as it is likely that the tenure types will need to reflect the requirements of both authorities.
- 6.8 In terms of sizes, as the application is being made in Outline with all matters reserved, the mix of properties in terms of number of bedrooms is not yet set. We would expect the affordable housing mix to reflect locally arising need in terms of accommodation sizes.
- 6.9 Similarly it is not possible to provide floorspace sizes and detailed plans for the affordable units, as no properties have as yet been designed. It is expected that the location of affordable housing units will be 'pepper-potted' within the scheme, with groups of a scale appropriate for efficient management. No Registered Provider has as yet been selected.

¹ NB some of these matters may be suitable for dealing with by Condition rather than as s106 obligations.

- 6.10 Delivery would be phased in accordance with set triggers, alongside the provision of market homes.
- 6.11 Overall, the provision of affordable housing is intended to be in line with policy requirements, phased throughout the scheme, and in line with local housing need.

7. Summary and Conclusions

- 8.1 This Planning Application seeks permission for an extension to the existing urban area of Ipswich on the northern side of Humber Doucy Lane, in accordance with the cross-boundary allocation, covered by the Ipswich and East Suffolk Local Plans.
- 8.2 As this is an Outline Application with matters of detail reserved for future approval (with the exception of details of access into and out of the site), the first main issue to be considered is the principle of developing up to 660 homes on the site, alongside the non-residential uses, open space, and other relevant infrastructure.
- 8.3 Alongside the issue of the principle of the proposed development is the identification of the necessary physical and social infrastructure needed to support that scale of development. This includes any infrastructure required to be provided on-site (for example the Early Years facility), any infrastructure required to be delivered by the developers off-site (such as any highway works or traffic management measures), and contributions that are required to be paid to other infrastructure providers (such as the Education Authority). A combination of planning conditions, s106 obligations, and payments under the Community Infrastructure Levy (in East Suffolk) are the normal means by which such infrastructure is secured.
- 8.4 As the proposed development also includes details of the means of access into and out of the site, those access arrangements constitute an additional key issue for consideration as part of this application. The access arrangements have been informed by pre-application discussions with the relevant authorities and the feedback from community consultation regarding impacts on Humber Doucy Lane.
- 8.5 Finally, although matters of detailed design are reserved for future consideration and approval, it is relevant to consider whether or not the proposed development sets an appropriate framework within which detailed design proposals can be brought forward. The Design and Access Statement is the principal document that explains the overall vision for the development and how a quality scheme can be achieved.
- 8.6 On behalf of the applicants, it is submitted that the proposed development accords with the relevant policies of the Development Plan, can deliver the requisite infrastructure, provides effective means of access for all modes of travel, and sets an appropriate framework for future detailed design. Accordingly, it is submitted that Outline planning permission should be granted.

APPENDIX 1

Assessment of the Proposals Against Relevant Development Management Policies

POLICY	ASSESSMENT OF THE PROPOSALS AGAINST POLICY
CLIMATE CHANGE AND THE NATURAL ENVIRONMENT	
DM1 & SCLP9.2 – Sustainable Construction Requirement of 19% and 20% respectively for reduction in CO2 emissions below the target rate set out in Building Regulations. Water efficiency of 110litres/person/day SCLP9.2 encourages locally sourced, reused and recycled materials along with on-site renewable energy generation and waste minimisation. DM1 requires surface water to be managed as close to its source as possible.	See Energy and Sustainability Statement by JS Lewis Ltd.
DM2 & SCLP9.1 – Renewable and Low Carbon Energy DM2 requires at least 15% of energy requirements from decentralised and renewable or low-carbon sources, subject to being feasible/viable.	See Energy and Sustainability Statement by JS Lewis Ltd.
DM3 & SCLP10.3 – Air Quality/Environmental Quality Impact on air quality to be mitigated and AQA required where proposals are likely to expose residents to unacceptable levels of air pollution. SCLP10.3 states proposals will also be considered in relation to impacts on soils and agricultural land, land contamination, water quality, light pollution and noise pollution.	Site is not within an AQMA and there are no air quality issues arising for future residents – see AQ Statement by AQ Consultants. Air quality during construction stage to be controlled through appropriate techniques in Construction Management Plan.
DM4 & SCLP9.5 9.6 and 9.7 – Flood Risk, Drainage and Water Management No increase in the overall risk of all forms of flooding through mitigation and use of SuDS. Adequate sewage treatment capacity and foul drainage. Inclusion of water efficiency measures. Run-off restricted to green field rates wherever possible. Provision of FRA.	Drainage Strategy has been prepared in consultation with the LLFA at pre-application stage to effectively manage surface water. FRA includes advice from Anglian Water on the adequacy of the foul drainage network. Water efficiency – see 4.1.2 of the JS Lewis Energy and Sustainability Statement.
DM8 & SCLP10.1 – The Natural Environment/Biodiversity and Geodiversity Incorporate measures to provide net gains/positively contributes towards biodiversity. Contributions to mitigate impacts on Sites of International and National Importance through the RAMS. Developments to include enhancements for protected and priority species.	The separate ecology reports explain how the proposed development can include for on-site enhancements for protected species, and deliver 10% net gain by a combination of on-site and off-site measures. Mitigation of international habitats is dealt with in the separate Habitats Regulations Assessment report.
SCLP10.4 – Landscape Character -	See Landscape and Visual Impact Assessment for explanation of landscape character and the means by which the development has been designed to respect that character.
SCLP10.5 – Settlement Coalescence	The 'green trail' and green edge to the development helps to maintain settlement separation.
DM9 – Protection of Trees and Hedgerows	See Arboricultural Impact Assessment – the proposals have sought to minimise impacts on existing vegetation as described in Section 5 of this Statement.
DM10 - Green and Blue Corridors	See Green Infrastructure Parameter Plan and Design and Access Statement.
BUILT AND HISTORIC ENVIRONMENT	
DM12 & SCLP11.1 – Design and Character/Quality Requirement for developments to be locally distinctive, well designed and sustainable. Support for inclusive design.	Primarily a matter for detailed design, but see Design and Access Statement for general explanation on design, including in respect of inclusive design.
DM13, SCLP11.3, 11.4, & 11.6 – Built Heritage and Conservation	See Heritage Impact Assessment.

Consider impacts on designated and non-designated heritage assets.	
DM14 & SCLP11.7 – Archaeology Requirement for assessment of archaeological significance of the site proportionate to the significance of the site.	See Archaeological Assessment.
DM18 & SCLP11.2 – Residential Amenity Requirement to consider the impact of development on residential amenity.	No impacts expected in terms of built form, due to separation. External impacts arising from traffic in terms of noise and air quality are considered in the respective reports. Construction activity to be subject to Construction Management Plan.
DM23 – The Density of Residential Development Ipswich policy requirement for at least 35dph unless a different approach can be justified.	As explained in this Statement, the proposals will achieve a minimum of 35 dph across the site as a whole.
TRANSPORT	
DM21 & SCLP7.1 – Sustainable Transport and Access Promote sustainable growth and reduce the impact of traffic congestion and encourage travel by non-car modes. Both policies set out criteria for new development to meet.	See Transport Assessment and draft Travel Plan.
DM22 & SCLP7.2 – Parking Policies to ensure parking in accordance with Suffolk Guidance for Parking with high quality, secure cycle parking to be provided.	Detailed layouts will provide appropriate vehicle and cycle parking, having regard to the relevant parking guidance, at the relevant design stage.
COMMUNITY FACILITIES AND ASSETS	
DM24 & SCLP8.1 – Protection and Provision of Community Facilities	The proposed development does not lead to the loss of any existing community space (but does provide for the potential for new community space as part of the non-residential floorspace proposed).
DM5 – Protection of Open Spaces, Sports and Recreation Facilities	With the exception of the removal of the existing rugby pitches (the rationale for which is explained in this Statement), there is no loss of existing open space. The proposed open space significantly exceeds policy requirements and is directed towards the areas of greatest local need.
DM6 – Provision of New Open Spaces, Sports and Recreation Facilities	See above.
DM7 – Provision of Private Outdoor Amenity Space in New and Existing Developments	This is a matter for detailed design, but the proposed density of 35dph (up to 40 dph in parts) is a density of development that is readily compatible with the provision of appropriate levels of private amenity space.
SCLP8.2 – Open Space	See above
SCLP8.3 - Allotments	See above – there is a surplus of allotments in the local area compared to standards.
DM34 – Delivery and Expansion of Digital Communications Networks SCLP8.4 – Digital Infrastructure	The proposed development will provide Fibre To The Property (FTTP) (see 6.2 of the Utility Statement.



Phase 2

PLANNING &
DEVELOPMENT
LIMITED