

PLANNING APPLICATION FRONT SHEET

Site	Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane Ipswich Suffolk
Appn Ref	IP/24/00172/OUTFL
Proposal	Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access 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. (THE APPLICATION IS A CROSS-BOUNDARY APPLICATION AND IS LOCATED IN BOTH IPSWICH BOROUGH COUNCIL AND EAST SUFFOLK COUNCIL).
Applicant	Barratt David Wilson And Hopkins Homes
Agent	Kevin Coleman
Ward	RUSHMERE

Press List Published	02/04/24	Readv		Exps	
Expires	04/06/24				

Site Notice Type	SN1	Displayed 02/04/24
		Expires 23/04/24

Cert B, C, or D Expires	
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Neighbours notified on 28.03.2024

DOUBLE CHECKED AGAINST OS PLAN (PLEASE INITIAL AND DATE WHEN CHECKED)

Admin	GW 02-04-2024	Senior Clerk		Planning Officer	
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Date expires		24.04.2024			
Cons. Panel	NO	Date			
Disabled Access Panel	NO	Date			
Committees	NO	Date			
Committee Site Visit	NO	Date			

Recommendation	Deleg. Decision
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**Decision - Summary of Reasons for grant of permission
Summary of Policies and proposals in the development plan**

See officer report below.

Continue on separate sheet if necessary

P.O: RCL	Date: 04.06.24	Authorised Officer: JM	Date: 04.06.24
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Expiry Date: **04.06.2024**

APPLICATIONS IP/24/00172/OUTFL & DC/24/0771/OUT - Introduction

This report captures considerations and information for both applications. However, for decision making purposes this relates only to the Ipswich Borough application area (IP/24/00172/OUTFL) as the decision of Ipswich Borough Council as the relevant Local Planning Authority. The consultation, consideration determination of both of these applications has been carried out collaboratively between the two Councils, with Ipswich Borough as the lead determining authority (and in accordance with each Council's Statement of Community Involvement). Therefore, the reports of both

Councils are largely similar, though emphasis is changed between each report depending on the relevant Local Plan policies and the relevance of the points of consideration.

1. Proposal:

- 1.1 This is a part Outline application relating to the proposed development of 660 dwellings alongside the provision of associated non-residential uses, open space and other relevant infrastructure. It is also a part Full application for the means of access between the site and surrounding areas.
- 1.2 The proposals include an outline application submitted on the basis of all matters of detail (defined as Access, Appearance, Landscaping, Layout and Scale) being reserved for subsequent approval, with the exception to this a Full application for the means of vehicular, pedestrian and cycle access between the site and surrounding areas. Because the application does not provide any details for access within the site, however, "Access" is considered a Reserved Matter, as only partial details are provided with the application.

Housing

- 1.3 The proposal will provide up to 660 dwellings, 200 (31%) of which will be affordable houses.
- 1.4 The tenure and size mix of housing has not been established as part of this application. The applicant has stated that these details will be informed through further discussion and using the East Suffolk Council's Affordable Housing SPD as a starting point for considering an appropriate mix of tenures, while also making use of Ipswich Borough Council Policies and reflecting locally arising need in terms of accommodation sizes.
- 1.5 The detail of the Affordable Housing mix has also not yet been determined, although the Affordable Housing Statement outlines that the level of provision will be in accordance with the respective Local Plan policies. It is not known exactly 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.
- 1.6 The overall density of the proposed development is proposed at a minimum of 35 dwellings per hectare (and up to 40dpa) although this varies across the site to reflect the status and character of different areas.
- 1.7 The portions of the Application Site within the IBC area lie within the 'Rural Edge' sub area of the North-East 'Character Area' of the Ipswich Urban Characterisation Study, and are adjacent to the 'Rushmere Estate' character sub area. The portion of the Application Site within the East Suffolk area has a more

rural interface, and nearby villages such as Tuddenham, Westerfield and Rushmere St Andrew are surrounded by a greener, more agrarian and less dense built form.

- 1.8 Character areas identified in the proposal include Tuddenham Green (Character 1), Humber Doucy Local (Character 2) and Rushmere Edge (Character 3).

Open Space

- 1.9 The proposals include a substantial green open space located along the countryside edge in the 'Green Trail' area, and other smaller areas like the Village Green and linear green corridors through the site. The total accessible open space proposed on the site is identified as a total of 11.44 ha, with 1.01ha of that identified for children's playspace, young people and parks and gardens. Natural and semi-natural open space would make up 9.56ha and amenity green space 0.87ha.
- 1.10 The Green Trail route is proposed to run along the north-eastern boundary of the Site and along the existing public footpath in the north of the Site to create a transition to the wider rural countryside.
- 1.11 The play spaces are proposed to include 3 Local Equipped Areas of Play (LEAP) and 1 Multi-Use Game Area (MUGA). An additional Youth Space for Girls has been identified although it is unclear what this will comprise.
- 1.12 Green Corridors are proposed which connect the Village Green with the Green Trail route to the north and east, as well as other public open spaces around the periphery of the development site.

Highways

- 1.13 The proposal is to provide all vehicular access from Humber Doucy Lane or Tuddenham Road (for the northern portion), with no vehicular access from Tuddenham Lane or Seven Cottages Lane.
- 1.14 The principal access is proposed opposite Inverness Road off Humber Doucy Lane. This spine road would provide the main access to the site from Humber Doucy Lane and serve the majority of the parcels, with the exception of parcels D in the north and E in the south-east. It will access the site opposite Inverness Road, loop around the middle of the site and the central open space, continue to the north of the site and end at parcel B1. This access would benefit from a signalised junction.
- 1.15 The second access proposed is a priority-controlled T-Junction off Tuddenham Road and would only be for the northern portion of the development site (Parcel D). There would be no vehicular connectivity between the road serving this parcel and the spine road.
- 1.16 A second access for bus traffic only is proposed off Humber Doucy Lane opposite Sidegate Lane.

- 1.17 A secondary vehicular access off Humber Doucy Lane to service the south-eastern portion of the development site (Parcels E1 and E2) is also proposed. This would comprise a priority-controlled T-Junction. There would be no vehicular connectivity between the road serving this parcel and the spine road.
- 1.18 An internal road loop in each of the three main parcels would facilitate access to individual areas within the site, whilst also providing a suitable route for buses within the main parcel.
- 1.19 Parameter Plan 08203 *REV P02* provides an overview of the adoptable street types. Detail of the proposed access points is provided in plans *C-0001-P02*, *C-0002-P02*, *C-0003-P02*, *C-0004-P02*, *C-0005-P02* and *C-0006-P01*.
- 1.20 Access for cyclists is proposed from the same four locations on Humber Doucy Lane

Car Parking

- 1.21 The proposed development will deliver car parking in accordance with Policy DM22 of the Ipswich Local Plan and Policy SCLP7.2 of the Suffolk Coastal Local Plan which refer to 2023 SCC standards. Details will be provided at reserved matters stage.
- 1.22 Electric vehicle charging points will also be provided in accordance with the 2023 SCC standards.

Cycle Parking

- 1.23 The proposal states that cycle parking provision for residents will be provided at reserved matters stage in accordance with the 2023 SCC standards.

Drainage

- 1.24 The Application is supported by a Flood Risk Assessment and Drainage Strategy dated February 2024. The proposed development site lies in an area designated as Flood Zone 1 and is outlined to have a chance of flooding of less than 1 in 1,000 (<0.1%) in any year from fluvial sources. Being located away from tidal water bodies, the site also has a very low level of flood risk from tidal sources. Flood risk from surface water, ground water and sewer sources are classified as 'low' with mitigation for surface water risk including the development of a surface water drainage strategy to manage water generated on site, with SuDS utilised to control and store surface water. The proposed development as residential in nature is classified as 'more vulnerable' but because of low and very low identified risk and appropriate identified mitigation considered appropriate within Flood Zone 1 without application of the Exception Test.

Landscaping

- 1.25 Landscaping is one of the matters reserved for subsequent approval, and so

plans submitted are in outline only. A Landscape Strategy Plan has been submitted as part of the Masterplan in the submitted Design and Access Statement. Landscaping at this level links to the 3 proposed character areas and the green trail

- 1.26 Tree Preservation Orders (TPOs) on the application site consist of refs: 19/00006/TPO and 15/00003/TPO. TPO trees are not identified for removal under this application, and a green buffer is proposed.
- 1.27 To assess the arboricultural implications of the proposed site accesses and associated visibility splays, sixty-five individual trees, twenty-six groups of trees, fourteen areas of trees and seventeen hedges were inspected. The proposed development would result in the loss/removal of 2 areas of trees and a portion of 6 hedgerows. Of these 8 arboricultural assets, 6 are identified as BS Category B and 2 as BS category C. A further 2 assets (H006 and H017) are identified as having a high visual amenity assessment score (the remaining 6 having a moderate score). It is noted that the loss of these areas of trees and hedging does not include the implications of the detailed layout for the housing proposed, as it is assumed this would be determined at reserved matters stage.
- 1.28 The proposal does not quantify the replacement trees and hedgerows to compensate for those removed but does note that a substantial quantity of additional trees and new hedgerows will be delivered with the detailed landscaping plan.

Ecology

- 1.29 The development proposed was submitted with the following ecological documents – Preliminary Ecological Appraisal (CSA Environmental, March 2024), Ecological Impact Assessment (CSA Environmental, March 2024), Information to inform Habitats Regulations Assessment (CSA Environmental, February 2024), Biodiversity Net Gain Assessment: Design stage ((CSA Environmental, March 2024), Illustrative Landscape Strategy (CSA Environmental, February 2024), Arboricultural Impact Assessment (Hayden's, Feb 2024) and Parameter Plan: Green & Blue Infrastructure Rev P02 (PRP, February 2024). These relate to the likely impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation. The proposal plans to create new habitats on the site which currently has an arable use, and previously had been intensively farmed. These new habitats are to be created by the new parks and green corridors along with the SuDS features and planted road verges.
- 1.30 Ecology submitted information includes a limited set of species surveys with further survey work planned for spring/summer 2024. The schedule of trees within the AIA identifies one mature Oak as a potential ancient/veteran tree, with further assessment required.
- 1.31 A Shadow Habitats Regulations Report has been submitted to support the Local Authority with the preparation of a Habitats Regulations Appropriate Assessment.

1.32 Biodiversity Net Gain information has been submitted with the application and goes beyond the basic requirements, although however it is still below the required 10% so will need to undertake off site mitigation. As high and medium habitat is proposed, a Habitat management and monitoring condition/or legal agreement will be required.

1.33 The application was submitted with the following supporting documents:

Application plans

- Site Location Plan
- Existing Site Plan
- Parameter Plans - Land Use; Green and Blue Infrastructure; Access and Vehicular Movement; Public Transport; Pedestrian Movement; Cycle Movement; Maximum Density; Maximum Height.
- Proposed Access Strategy Sheets 1 -6

Illustrative Plans

- Illustrative Framework Plan
- Landscape Strategy

Reports and Other Documents

- Acoustic Report/Noise and Vibration Assessment (24 Acoustics **20th February 2024**)
- Air Quality Assessment (Air Quality Consultants **February 2024**)
- Arboricultural Impact Assessment (Haydens **29th February 2024**)
- Archaeological Assessment (RPS **2nd November 2023**)
- Biodiversity Net Gain Assessment (CSA **March 2024**)
- CIL Form (P2P **29th February 2024**)
- Design and Access Statement (incl statement on crime prevention and open space strategy) (PRP Architects **February 2024**)
- Geotechnical and Geoenvironmental Interpretative Report (RSA Geotechnics Ltd **November 2022**)
- Design and Access Statement (incl statement on crime prevention) (PRP Architects **February 2024**)
- PEA Report and Ecological Impact Assessment (CSA **March 2024**)
- Energy and Sustainability Statement (JS Lewis rev C **February 2024**)
- Flood Risk Assessment and Drainage Strategy (RSK **February 2024**)
- Habitat Regulations Shadow Report (CSA **February 2024**)
- Health Impact Assessment (P2P **February 2024**)
- Heritage Statement (MJK Build **undated**)
- Landscape and Visual Impact Assessment (CSA **February 2024**)
- Open Space Assessment (P2P **February 2024**)
- Planning Statement (incorporating Affordable Housing Statement and Draft Heads of Terms) (P2P **February 2024**)
- Retail Impact Assessment (Peacock & Smith **4th March 2024**)
- Statement of Community Involvement (Concilio **February 2024**)

- Site Waste Management Plan (BDW/Hopkins **February 2024**)
- Transport Assessment (RSK **March 2024**)
- Travel Plan (RSK **March 2024**)
- Utility Statement (BDW/Hopkins **February 2024**)

2. **Background**

- 2.1 As detailed above, this is a hybrid application, and submitted as part outline (development of up to 660 dwellings and associated non-residential uses, open space and other infrastructure) and part full application for the means of access between the site and adjacent roads.
- 2.2 The proposal relates to a development site which is located in both Ipswich Borough Council and East Suffolk Council. Identical planning applications for the full extent of the proposed development have been submitted to each Council for assessment and determination. The application content is therefore the same, however each Council is required to assess this against their own adopted planning policies. A planning reference has been given by each Council to the planning application submitted to them (Ipswich Borough Council reference is IP/24/00172/OUTFL and East Suffolk Council reference is DC/24/0771/OUT). Each Council undertook their own public consultations on their respective application in accordance with their respective Statement of Community Involvement. It was advised as part of the public consultation that comments made on the planning application could be sent to either Council quoting the relevant planning application reference and both Councils would ensure that consultation responses are shared and taken into account in each Council's assessment and determination of the application.
- 2.3 The application was subject to pre-application advice. A series of pre-application meetings were held to discuss matters – meetings were held 20th July 2023, 15th September 2023, 19th October 2023 (site visit), 1st November 2023, 2nd November 2023, 29th November 2023 and 8th December 2023. A written letter of advice was issued 8th February 2024 which provided an overview of the matters discussed and highlighted further work and / or information that was required and advised needed to be resolved prior to submission of a planning application. The content of the letter was worked on by both authorities and provided joint advice from both ESC and IBC Planning Officers. A planning application was submitted in March 2024 contrary to both Local Planning Authority's advice.
- 2.4 No Planning Performance Agreement was entered into for this application and is therefore subject to statutory timeframes for determination.
- 2.5 It is noted that in response to some of the consultation responses received during the public consultation of the application, amended and / or supplementary information has been offered by the applicant to resolve the issues identified. It has not been possible to give full and proper consideration to any amended and / or supplementary information proposed by the applicants due to this being

offered outside the consultation period and the statutory timeframes for determination which apply to this application. This report therefore only assesses the original submission of the application which has been consulted upon and has been considered by officers.

Site Context

- 2.6 The proposed development falls within a residential site allocation in both the Ipswich Borough Council Local Plan (ref: ISPA4) and the East Suffolk Council Suffolk Coastal Local Plan (ref: SCLP12.24).
- 2.7 The application site comprises of three parcels of land adjacent to the existing urban footprint of Ipswich and approximately 3km to the north-east of the town centre. The development proposed in these parcels would be located north of Humber Doucy Lane, south and west of Tuddenham Lane and east of Tuddenham Road. The total site area is 31.52ha.
- 2.8 The application site is situated on the edge of the Ipswich urban footprint, with two storey and single storey residential development at medium densities located along the interface with the site in Humber Doucy Lane.
- 2.9 To the north and east of the site, the development footprint is rural in character, with small clusters of residential dwelling positioned in between agricultural fields, and the villages of Tuddenham St Martin approximately 1.2km to the north and Rushmere St Andrew approximately 660m to the south-east.
- 2.10 The main developable parcel 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, divided by an established tree lined public right of way (which 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. The smaller field on the northern side is roughly triangular in shape and bordered to the north by the railway line.
- 2.11 The second largest parcel lies to the south-east of the main parcel with 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. The access to the Rugby Club separates the main parcel from the south-eastern parcel.
- 2.12 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 the event there is any requirement to undertake highway improvements at the Humber Doucy Lane/Tuddenham Road junction. No development is otherwise planned for this parcel.
- 2.13 The application here under consideration covers the entire allocation except for a rectangular parcel of land fronting onto the south side of Humber Doucy Lane, which is not within the control of the applicant. No applications have been

submitted for this parcel.

- 2.14 The site is an undeveloped greenfield site currently under use as agricultural fields and a rugby pitch. There is no evidence of any other kind of development on the site since 1948 and no demolition is proposed.

Surrounding development

- 2.15 The Westerfield House site, which includes a Grade II Listed 18th century building of red brick, located to the south and western boundaries, benefitted from a change of use in 2011 under 11/00066/FUL from Hotel to Residential Care Home. In 2018, under application ref: 18/00137/FUL an application was approved for the stopping up of existing site access point, modification of existing access and the construction of a new vehicular exit on to Humber Doucy Lane. The report for this approval mentions the inclusion of a bus stop and pavement along Humber Doucy Lane although these were required to be installed as a condition of earlier planning permissions IP/11/00066/FUL, IP/11/00601/LBC, IP/11/00602/FUL, IP/14/01038/LBC and IP/14/01039/FUL. Condition 6 of 11/00601/LBC (bus stop details) was discharged under 12/00539/CON. The requirement for bus stops (along with paths etc) was also repeated on the 2018 outline for the care village.
- 2.16 In 2019, under application ref: 18/00526/OUT, a further outline proposal to erect a care village comprising 147 assisted living apartments in blocks across the site, a central communal area, parking for 92 vehicles and two detached dwellings was approved. This shows the access arrangements, pavement and bus stop approved in 18/00137/FUL and earlier permissions. It is noted that the bus stop condition imposed on the 2011 and later variations of that approval has never been complied with as it required an agency agreement for the siting of the bus stop on the opposite side of the road, which is no longer available and cannot be installed. An application to vary the condition to only require a single bus stop on the north east side of the road was approved under 24/00126/VC in May 2024.
- 2.17 In 2022, under ref: 22/00054/REM a submission of reserved matters in respect of appearance, landscaping, layout and scale further to Outline Permission 18/00526/OUT for 147 living unit 'Care Village' and two associated staff dwellings was approved. Works appear to have commenced on site, as well as showing evidence of newly completed works from previous permissions. Development will include 1-3 storey residential blocks in fairly close proximity to the site boundary with the proposed residential development at Humber Doucy Lane. Of the existing protected groups of trees on the site and along its boundary, most of the significant trees look to be retained, and the proposed loss of hedging would be mitigated. The character along this boundary will therefore exhibit a denser urban form in the next couple of years than the current open and vegetated space that is partly under construction.
- 2.18 Surrounding designated heritage assets adjacent to the boundaries of the site comprise the Grade II listed Westerfield House, fronting HDL on land between two of the site parcels; and Grade II listed Allen's House, Lacey's Farm and the Garden Store north of Villa Farm, to the east of the site boundary. The Water

Tower, Seven Cottages and Villa Farmhouse are non-designated heritage assets along Tuddenham Lane. All currently lie within a surrounding setting of open farmland.

2.19 Ipswich Garden Suburb, located at its closest point approximately 615m west of the application site, is a substantial development area allocated under the Ipswich Local Plan for an urban extension to Ipswich. The area consists of 195 hectares of land to the northern fringe of Ipswich with a capacity of 3,500 dwellings together with associated infrastructure including public open space, a country park, district centre, local centres, secondary school, three primary schools and primary road infrastructure including bridges over the railway line. The development footprint extends across three neighbourhoods (Henley Gate, Fonnereau and Red House) and multiple landowners and developers. Some of the facilities provided in the Ipswich Garden Suburb will accommodate the development needs of the Humber Doucy Lane development, in particular schools.

2.20 The Ipswich Rugby Club is located between the main and south-eastern development parcels and north of the application site and consists of several pitches and a club building. The rugby club received its original temporary 2-year permission for a change of use from agriculture to sports use in 1992 under 92/00526/FUL. This permission was renewed in 1994, and gradually extended in 1996 (96/00729/FUL), 2001 (01/01160/FUL), 2009 (09/00466/FUL), 2012 (12/00581/FUL) and finally in 2016 (16/00588/FUL). The last temporary use issued in 2016 expired on the 15th August 2019, and the use appears to have continued on all parts of the site, with kept playing surfaces, sporting equipment and installations such as goal posts visible when officers visited the site visit on the 26.04.2024. Whilst no applications have been submitted, we are aware that the Rugby Club wishes to relocate in the medium term. At present the Rugby club is in active and constant use through the week including weekends and evenings. The pitches benefit from floodlighting.

2.21 **Active/recent notable planning applications surrounding the site:**

East Suffolk Council:

- DC/22/2039/FUL - Change of Use from agricultural barns to domestic use; alterations and extensions to buildings to accommodate one dwelling unit. Villa Farm, Tuddenham Lane (approved)
- DC/22/1184/FUL - Single storey rear extension and new window openings to existing ground floor garden room as well as render exterior finish to host dwelling and addition of an oak gate. Villa Farm, Tuddenham Lane
- DC/21/5773/FUL - Change of use of site from agricultural to ecological enhancement. Land To The South Of Church Lane, Westerfield (awaiting decision)
- DC/21/3035/FUL - Change of use of land from agricultural to an enclosed dog exercise field (Suis Generis). Land At Church Lane, Westerfield (approved)
- DC/21/0615/FUL and DC/22/2640/VOC - Change of Use from former water tower to dwelling and extension. Proposed amendments to the hardstanding

- access. Water Tower, Tuddenham Lane (approved)
- DC/20/4645/FUL - Retention of detached cartlodge/ stores outbuilding. Tilers Cottage, 1 Seven Cottages Lane (approved)

Ipswich Borough Council

- 23/00900/FUL - Creation of additional parking and relocation of dog exercise area and associated landscaping. Tuddenham Road Business Centre. (approved)
- 23/00036/FUL – Erection of 1.8m replacement fence on the front boundary of the property. Westerfield House Cottage, Humber Doucy Lane. (approved)
- 22/00859/FUL – Change of use from day nursery (Class E(f)) to High School (Class F1 (a)). 316-318 Tuddenham Road. (approved)
- 22/00811/FUL - Change of use to care home with single-storey and two-storey extensions to side and rear. Alterations to existing vehicular access and front wall. The Lodge Tuddenham Road. (approved)
- 22/00054/REM – Submission of reserved matters in respect of appearance, landscaping layout and scale further to Outline Permission 18/00526/OUT for 147 living unit 'Care Village' and two associated staff dwellings – Westerfield House, Humber Doucy Lane. (approved)
- Various outline and reserved matters planning applications for the Ipswich Garden Suburb approved and under consideration. Ipswich Garden Suburb allocation is for up to 3,500 dwellings and a total of 1,915 dwellings have been granted outline consent to date. A further outline planning application for 1,020 dwellings is currently under consideration.

2.22 Relevant Planning History for the application site:

Application Reference	Proposal	Status
72/00108/OUT	Erection of houses and bungalows with off-site storm water sewer to River Finn and a foul sewer pumping station.	Refused 30.11.1972
92/00441/OUT	Residential development (incorporating affordable housing) and including public open space, roads, roundabouts and off site drainage works.	Withdrawn 22.08.1992
92/00442/OUT	Residential development of 150 dwellings (including affordable housing) involving access road with roundabout off Humber Doucy Lane and off site drainage works	Withdrawn 22.08.1992
12/00581/FUL	Change of use from agricultural land to playing fields for a temporary period of 3 years (extension of planning consent IP/09/00466/FUL)	Approved with conditions 18.09.2012
DM/2024/0005	EIA Screening for up to 675 homes, an early-years setting and up 400m ² net of non-residential floorspace.	EIA is not required 21.05.24

3. Consultations

3.1 The application as originally submitted was subject to public consultation in April

2024. The application has been consulted on in accordance with the adopted Ipswich Statement of Community Involvement (SCI) (Jan 2024).

- 3.2 The following section summarises the responses received and identifies when the comments were received.

External consultees:

Suffolk County Council Highway Authority received 24.05.2024: Holding Objection until the information presented within this consultation response has been submitted for review. Elements to the holding objection:

- **Access and Accessibility** - The proposed site is severed by the existing rugby club on Humber Doucy Lane resulting in concerns around permeability and connectivity within the site which should be considered by the Local Planning Authority. Consideration to be given to the feasibility of providing a continuous walking and cycling route on the northern side of Humber Doucy Lane to accord with the LTN 1/20 principles of directness and coherence and compliance with Section 9 National Planning Policy Framework 2023 (NPPF) and Local Plans. Incorporation of the rugby club would enable the opportunity to relocate the existing access to be served through the infrastructure associated with the development site and subsequently, permanently stop-up the existing rugby club access from Humber Doucy Lane and provide the main site access opposite Sidegate Lane. SCC as Local Highway Authority considers that the main site access would be better served opposite Sidegate Lane as it would provide more direct accessibility to the A1214 corridor and reduce the likely intensification of Inverness Road resultant of the current proposal to provide a signalised access opposite Inverness Road. Furthermore, positioning the signalised site access opposite Sidegate Lane would reduce convenience of motorists routing towards Tuddenham and to Church Lane which provides an alternative route to the A1214 corridor for vehicles traveling west. Further justification should be provided as to why the above approach has not been taken to maximise site accessibility and permeability for active travel modes. This will include the need to provide evidence that attempts have been made to approach the rugby club and incorporate land within the development.
- **Proposed Accesses – Bus only Site Access** (opposite Sidegate Lane): concerns relating to conflict between the two access points would be mitigated if the bus-only access into the site was designed as an 'in-only' arrangement. This would require bus penetration into the site from the bus-only access, with egress for busses from the main vehicular access opposite Inverness Road. Design as specified. Proposal to provide a parallel crossing west of the bus-only access is supported with appropriate lighting. Signalised Junction Site Access (opposite Inverness Road): It has not been evidenced that a suitable signalised junction design can be delivered at this location. Need to supply forward visibility splays; confirmation of

straight over crossing point designed to standards and with indication of ongoing connections for both pedestrians and cyclists; tactile paving on north-west side of crossing. Potential impacts to Inverness Road include increased vehicle trips on Inverness Road, with mitigation likely required. Priority Junction Site Access (Tuddenham Road): SCC would seek a contribution to fund an extension to the existing 30mph speed limit further north. A plan required to demonstrate achievability of southbound Y-value. a 2.0m footway has been proposed adjacent to each side of the proposed access. A 3.0m shared use facility will be required to provide cycle accessibility into the site. Cycle infrastructure will be expected to link into the strategic walking and cycling network south of the Public Right of Way and the Parameter Plan should be revised to illustrate this. Priority Junction Site Access (Humber Doucy Lane east): retention of the 10m clearance from Humber Doucy Lane is supported but access arrangement to be revised to accord with Figure 10.15 of LTN 1/20. Parcels E1 and E2 should be consider the incorporation of a cycle facility. Consideration has not been given to the provision of a suitable transition for the segregated walking and cycling route. Existing bus stop on Humber Doucy Lane, near to the connection to the proposed walking and cycling facility should be included within the details submitted for the transition onto Humber Doucy Lane and should be upgraded to include a bus shelter and raised DDA compliant kerbing. A suitable crossing point should be provided on Humber Doucy Lane to provide a direct connection to the route from the PRow to the Local Centre on Selkirk Road, with consideration with the walking and cycling facility. The upgrade of Footpath 48 should be included in plans, and an adjacent separate cycle track provided. Proposed walking and cycling facility and crossings: A further crossing facility should be considered to connect to existing Footpath 48. Information relating to traffic speeds should be provided to be assessed in conjunction with potential crossings.

- Transport Assessment – Trip distribution: the SCTM should be used to assess potential trip distribution from the site, and this information must be submitted for review as it will provide a useful comparison for trip assumptions. Trip generation: It does not appear that the trip generation forecasts presented within Table 6.2 of the submitted Transport Assessment correlate with the trips presented within the submitted Traffic Flow Diagrams (Appendix 14). Further information relating to the split of trip generation must be provided. Multi-modal trip information is limited to peak times, and trip rates for active and sustainable travel should be extracted from the TRICS outputs and presented as a total day number. Junction Modelling: Further junctions may require detailed modelling and reviewing following the outputs generated by the SCTM and alterations may be required to the models. The Origin-Destination model inputs for each of the junction models should be reviewed/re-assessed as they do not appear to correlate with the submitted Traffic Flow Diagrams. Committed development assumptions should be confirmed by the Local Authorities, although this may be provided by the SCTM data.

Details of the junction geometry plans should be submitted and Traffic Profiles need to accommodate potential variation in traffic flows. Accident data analysis: Data should be provided for a 7-year period between 2016 and 2024 (rather than 5 years). A1214 and Tuddenham Road Roundabout: SCC expects a design which better facilitates walking and cycling for any works required at this junction.

- Sustainable and Active Travel – application needs to demonstrate compliance with the following national and local policies: NPPF Section 9, paras 114(a) and 116(b); Local Policies DM21 and ISPA4.1 (IBC) and SCLP7.1 and SCLP12.24
- Off-site Sustainable and Active Travel - while proposals demonstrate that consideration has been given to the provision of walking and cycling access to the proposed development site, it is not evident that efforts have been made to promote and prioritise walking and cycling off-site within neighbouring areas – or to ensure safe and suitable access to the site for all users – contrary to local and national policy requirements. An off-site walking and cycling strategy should be developed and improvements recommended to ensure safe and suitable movement for pedestrians and cyclists and to maximise accessibility to sustainable modes of travel. A planning obligation to extend existing bus services is also supported.
- Public Rights of Way (PRoW) – consideration required of connections, integration and surfacing improvements required for footpaths 45, 48 and 49.
- Internal Layout – improvement to walking and cycling links internally is required - a more direct option for much of the site would be to continue the proposed walking and cycling facility from the bus-only access opposite Sidegate Lane throughout the middle of the site in a north-westerly direction, to provide direct permeability for parcels B1, C and D. Consideration will need to be given to the walking and cycling infrastructure to cross existing Footpath 45 and the proposed recreational route just north of the spine road.

Not part of the holding objection:

- The Travel Plan for the proposed residential use and early years facility will be conditioned to any permission and submitted six months prior to first residential occupation and prior to early years use.

Anticipated and required Planning Obligations to be sought:

- A planning obligation to fund the ongoing monitoring of the Travel Plans associated with the site.
- A planning obligation to fund the extension of a local bus service (or bus services) within the proximity of the site to provide an on-site bus service.
- A planning obligation to fund improvements to the existing PRoW network within the development site.
- A planning obligation to fund an extension to the existing 30mph speed limit on Tuddenham Road further north.
- A planning obligation to contribute towards the ISPA Transport Mitigation Strategy.

National Highways National Highways' formal recommendation is that planning permission **not be granted before 23 August 2024** to allow sufficient time for the following to be addressed:

- Junction assessments do not include junctions 53 or 54 of the A14. The Developer's consultant must provide more information with regard to how traffic is distributed between the A1214 and Strategic Road Network (SRN) junctions. A junction assessment is requested where 30 or more movements are forecast on an SRN junction. This additional information is required to allow for a definitive response from National Highways.

Standing advice relating to the promotion of modal shift for a transition to net zero carbon is also included.

Suffolk County Council Archaeological Service. Received 03.04.2024. Holding objection. Site has high archaeological potential and not been subject to extensive below-ground survey. Application cannot be assessed fully nor approved until extensive archaeological evaluation takes place.

UK Power Networks. Received 04.04.2024. Comment summary: HV cables are present on the site within close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from UK Power Networks, and all works should be undertaken with due regard to relevant Health & Safety Guidance.

Suffolk Fire and Rescue Service. Received 04.04.2024. Comment summary: Standard advice provided relating to meeting requirements for access provision and carrying capacity, as well as for fire hydrant positioning. Sprinkler recommendations for buildings also included.

Historic England. Received 05.04.2024. No advice offered, refer to specialist conservation and archaeological advisers.

Mid Suffolk and Babergh District Councils. Received 08.04.2024. No comment.

Suffolk County Council Directorate of Public Health and Communities. Received 10.04.2024. No comment.

Anglian Water. Received 12.04.2024. Comment summary: assets owned by Anglian Water are located within or close to the development boundary and informative text relating to planning around these assets to be included in a decision notice is provided. Wastewater: Foul drainage from this development is in the catchment of Ipswich-Cliff Quay Raeburn Water Recycling Centre that will have available capacity for these flows, and development is acceptable from a foul water perspective, with no condition required. Surface water disposal: The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. The surface water management method proposed does not relate to Anglian Water

assets. LLFA will therefore need to provide comments on this.

Ipswich Ramblers. Received 12.04.2024. Objection summary: Ipswich Ramblers object to this development which will have an adverse effect on rights of way in the area. In addition a large number of vehicles will use Humber Doucy Lane, Tuddenham Road and add more traffic to Valley and Colchester Roads which will already have increased vehicle movements from the Ipswich Garden suburb, compounding existing peak congestion and blockage if the Orwell Bridge is closed. The suggestion in the plans that walking, cycling and public transport will be used is unrealistic. A development of this size will cause many more vehicles to be driven on local roads.

Westerfield Parish Council. Received 15.04.2024. Objection summary: Objection on the basis of: i) Safety where vehicular access from the proposed junction onto Tuddenham Road has inadequate visibility; ii) detrimental impact on Westerfield village due to a further increase in regular and oversized traffic and pressure on junction with Westerfield Road resulting in air and noise pollution and anti-social behaviour from road users; iii) Request for a condition to prevent construction traffic using Church Lane to access the development site, with signage and enforcement in place. iv) Submitted "Transport Assessment Part 1" doesn't include assessment of condition, width, capacity, and lack of streetlighting in Church Lane.

British Transport Police. Received 16.04.2024. Comment summary: No objection in principle but the following concerns need to be addressed: 1) Prior to the occupation the fence on the boundary between the development and the railway line must be in line with the Network Rail standards - likely to be a steel palisade fence of 1.8m in height (to be confirmed by Network Rail) and provided at the expense of the developer. 2) Clarity and further discussion sought regarding the barrier between the finished development and the railway. 3) Consideration of the fencing required for several rail bridges and a foot crossing close to this development. Guidance and advice are available.

The Gardens Trust. Received 16.04.2024. No comment.

Suffolk Wildlife Trust. Received 17.04.2024. Comment summary: i) EIA: Bat survey methodology needs to be according to the most recent 'Bat Surveys for Professional Ecologists 3'. Query as to the value attributed to onsite hedgerows, as these are likely to be of at least County value. In relation to loss of sections of hedges, the mitigation hierarchy should be followed and wherever possible hedgerows used by barbastelle should be retained, or otherwise removal minimised with design used to mitigate impacts of removal. ii) Impact on County Wildlife sites: the proposed circular walking routes include a route running adjacent to Pumping Station Meadow CWS. While no public access is available at this site, consideration is required as to whether recreational pressure around the perimeter could impact the site. iii) Approximately the same number of bird and bat boxes as residential units are required as per the RIBA guidelines, so the 330 proposed are insufficient. Bird boxes need to be diversified to include species other than swift, and all bird boxes integrated into buildings should follow guidelines (BS 42021:2022 Integral nest boxes9). iv)

Biodiversity Net Gain: 10% cannot be met, and so new hedgerow planting should receive focus, and BNG secured through vegetated gardens should not be considered in the final calculation as it is not securable in the long term. v) The Habitat Management and Monitoring Plan (HMMP) should be secured through a S.106 agreement, rather than as a planning condition, including provision for remedial actions to be triggered if the required monitoring shows that post-development habitats fail to meet target condition, as further off-setting may be required. Overall, nature should be placed at the heart of the development and further discussion is welcomed.

Tuddenham St Martin Parish Council. Received 18.04.2024. Objection summary: i) Impact of additional traffic on the village of Tuddenham St Martin, ii) negative highway impact of the vehicular access proposed to be taken from Tuddenham Road, iii) the lack of proposals for safe use of footways and cycleways to access key social and economic destinations, including neighbouring villages, local services and facilities, including Westerfield Train Station, iv) the impact of additional pupil numbers for the catchment high school.

Sport England. Received 18.04.2024. Objection summary: Sport England raises a statutory objection to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 103 of the NPPF. We may reconsider this position should amended/additional details be provided detailing a replacement area of playing field of equivalent or better quality in a suitable location close to the existing club with accessibility.

Suffolk Constabulary. Received 19.04.2024. Comment summary: Suffolk Constabulary does not object to this application. A statement of crime prevention is required to be included with the full application and should include reference to Secured By Design (SBD) Homes 2024, detailing how issues such as the layout of the whole development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control where appropriate, secure cycle storage provision and lighting have taken crime prevention guidance into account. Guidance is provided (in detailed comments) to inform the specific crime prevention measures to be submitted as part of the reserved matters stage. This includes elements such as natural surveillance, access and permeability restrictions, orientation of buildings, special considerations for play and public open spaces, management and maintenance of vegetation and placement of trees, limiting cover, provision of CCTV and access control, avoiding blank gable ends adjacent to public areas, boundary treatments, communal amenity spaces and parking courtyards, restriction of vehicular access to pedestrian paths, cycle parking, lighting, design of access to flat blocks etc. The applicant is encouraged to apply for SBD certification.

SCC Growth, Highways & Infrastructure. Received 23.04.2024. Comment summary: Contributions required: Early years new: £1,982,750.00; Early years site £1; Primary School new: £6,097,120.00; secondary school new: £3,706,857.00; sixth form expansion £989,264.00; Household waste £91,080.00; Libraries improvement £142,560.00; SEND TBC; Primary School

Transport TBC; Highways TBC; Monitoring fee: £476.00.

Active Travel England. Received 23.04.2024. Objection/deferral summary: i) The application does not provide sufficient information for Active Travel England (ATE) to be assured that the design of the development, proposed active travel infrastructure and travel plan will create an environment that supports and embeds active travel in line with government's aims for 50% of all journeys in towns and cities to be made by walking, wheeling and cycling. ii) The application does not demonstrate that 'appropriate opportunities to promote sustainable transport modes can be - or have been - taken up' in accordance with the National Planning Policy Framework (NPPF), paragraph 116, 114a or that 'safe and suitable access to the site can be achieved for all users in accordance with NPPF, paragraph 114 b. It is therefore recommended that this application should not be determined until further information has been submitted and reviewed. **Areas of concern where further information is required include:** include Trip generation and assignment; active travel route audit; Pedestrian access to local amenities; Cycling accessibility. **Critical issues include:** Off-site transport infrastructure and access arrangements; Travel Planning. **Where a condition or obligation will make the scheme acceptable include:** Access to public transport; Site permeability; Place making; Cycle parking and trip-end facilities.

Ipswich Rugby Football Club. Received 24.04.2024. Comment summary: The application's statement that there is adequate provision for sports pitches in the area to mitigate the loss of facilities is inaccurate. The Playing Pitch and Outdoor Sports Strategy (November 202, East Suffolk Council) states that the club needs one more senior playing pitch. This position is endorsed by The Rugby Football Union and Sport England. The club is active and growing and the loss of pitches would be detrimental to the requirements of hundreds of child and adult members annually. The principle of equivalent or better provision should be adopted to ensure that the community value of Ipswich RFC is enhanced not eroded.

Natural England. Received 24.04.2024. Comment summary: **No objection subject to appropriate mitigation being secured.** We consider that without appropriate mitigation the application would have potential significant effects on: • European sites identified within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) • Deben Estuary Special Protection Area (SPA) • Stour and Orwell Estuaries SPA • Sandlings SPA • Stour and Orwell Estuaries Ramsar • Deben Estuary Ramsar. It would damage or destroy the interest features for which the underpinning Sites of Special Scientific Interest (SSSIs) of the above European sites have been notified: • Deben Estuary SSSI • Orwell Estuary SSSI • Stour Estuary SSSI • Ramsholt Cliff SSSI • Sutton SSSI • Sandlings Forest SSSI. In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures should be secured: i) A minimum 10ha area of suitable alternative natural greenspace (SANGS), which includes all the measures outlined in the SHRA and a requirement to provide a detailed plan and a long term funding, maintenance and management strategy for the SANGS at a future planning application stage. ii) A suitable contribution per

new dwelling to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS') to ensure that the delivery of the RAMS remains viable. We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures. A lack of objection does not mean that there are no significant environmental impacts. Natural England advises that all environmental impacts and opportunities are fully considered, and relevant local bodies are consulted.

Rushmere St Andrew Parish Council. Received 26.04.24. Comment summary: The development will have a detrimental impact on the highway network and this is against Policy DM21 of the Ipswich Local Plan and Policy SCLP7.1 of the Suffolk Coastal Local Plan with particular impacts noted for Humber Doucy Lane in combination with traffic from the Ipswich Garden Suburb. The concerns of Active Travel England in relation to walking and cycling infrastructure required are highlighted and re-emphasised. Concerns with the access arrangements and increased traffic along Humber Doucy Lane with particular reference to the junction at Seven Cottages Lane and parked cars along Humber Doucy Lane limiting visibility. Conflicts between transport modes identified and comments that the conflict would be reduced if the main pedestrian and cycle crossing is at the Sidegate Lane junction rather than the Inverness Road junction. The tiger crossing proposed at the Sidegate Lane junction should be replaced with a toucan crossing given the volume of traffic that would be generated by the proposed development.

In addition, it is advised: that improvements to the junction of Tuddenham Road and Humber Doucy Lane would alleviate traffic congestion along Humber Doucy Lane and would provide a suitable route for construction vehicles during the construction phase; the timing of the proposed traffic lights at the Inverness Road junction should be used to discourage the continuing use of Humber Doucy Lane as a shortcut around Ipswich; rural edge buffer should 15-25m wide; Tuddenham Lane access should not be for vehicles; Housing number is higher than allocation and development should be supported by appropriate infrastructure; BNG requirements, Flooding and surface water needs to be addressed appropriately and mitigated.

A concern is raised that there are no details provided of the construction traffic management plan and proposed routes that construction vehicles will use during the construction phase. A list of roads which the Parish Council consider unsuitable for construction traffic are provided.

Network Rail. Received 29.04.2024. Holding Objection summary: NR is concerned about the impact of the proposed development on Westerfield station, Westerfield level crossing and other nearby level crossings for which not enough information has been submitted. NR requests that the applicant provides an assessment detailing the potential impact of the development on Westerfield station and level crossings, to allow NR to advise on mitigation required. A meeting between NR, the developer and local authority may be required. Please also see the following initial comments: i) This development

will increase usage of Westerfield station for commuters and station facilities may need to be increased/improved. Suggested potential improvements include;

- Providing formal pick-up/drop-off facilities,
 - Arrangements for accessible parking,
 - Signage and lighting to promote active travel,
 - Ticket vending machines for both platforms to mitigate level-crossing risks.
- ii) Impacts on Westerfield station level crossing - The only access from one side of the railway to the other is via a CCTV crossing, where the barriers can be down for extended periods and for multiple trains, resulting in increased crossing risks.
- iii) Impacts on Westerfield Footpath level crossing and Lacys level crossings: There are several footpath crossings in the area, popular with existing residents, which provide an extensive walking/running/cycling route on both sides of the railway. The proposed development could increase usage of crossings and safety risk.
- iv) The site is located adjacent to the NR's operational railway infrastructure and therefore NR strongly recommends the developer contacts NR's Asset Protection Team.

Suffolk County Council, Lead Local Flood Authority (LLFA). Received 30.04.2024. Holding Objection summary: A holding objection is necessary because the flood risk assessment and drainage strategy has not fully considered the existing watercourse network around the site and therefore presents a risk of the development having an adverse impact on it and a resultant increase in flood risk on neighbouring sites. The drainage strategy relies on deep infiltration structures which are considered a last resort by SCC LLFA, we recommend a discharge to the watercourse network is fully considered as this is more sustainable than deep infiltration. We also require more SuDS incorporated into the parcels, swales along the main access roads and open/above ground conveyance of surface water from the parcels into the strategic basins before we can recommend approval.

Further details required include:

- A detailed survey of the watercourse network is required with a maintenance plan. This relates particularly to the watercourse adjacent the highway on the eastern parcel which may be impacted by highway upgrades.
- In relation to the Drainage Strategy, we would encourage a hybrid approach being adopted where surface water is directed to the nearby watercourse network where possible with deep infiltration being used where this is not possible, ie. adjacent the railway line. Deep infiltration is discouraged more widely on site.
- The greenfield runoff rate needs to be reviewed as it appears low.
- Surface water should be managed with more SuDS within parcels rather than pipe to pond approach.
- The simple index approach which has been used to assess the surface water pollution hazard is not applicable to the proposed complexity of the development.
- Main access roads should drain to roadside swales and details are

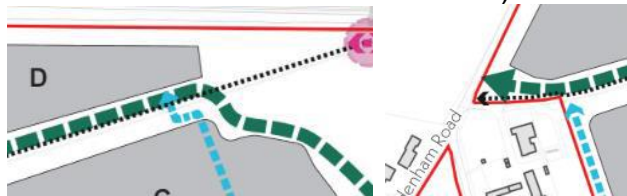
required. Confirmation with the schools team is required relating to an unrestricted discharge into the SuDS network.

- The strategic swales and basins should have dimensions provided to demonstrate they are in accordance with the Suffolk SuDS Guide.

NHS Suffolk and North East Essex Integrated Care Board. Received 03.05.2024. Summary of comments: Healthcare impact of the proposal and required contributions. Suffolk and North East Essex ICB has identified that the development will give rise to the need for additional primary healthcare provision to mitigate impacts arising from the development. the capital required through developer contribution (£380,200.00 in the form of a Section 106 planning obligation), would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development. Assuming the above is considered in conjunction with the current application process, we would not wish to raise an objection to the proposed development.

Public Rights of Way team, SCC (PRoW) received 17.05.2024 There are public rights of way (PROW) proposed site: The Definitive Map for this parish can be located at [Definitive Map and Statement of public rights of way - Suffolk County Council](#) but a more detailed plot of public rights of way must be requested by the applicant to accurately plot PROW on relevant plans.

- Any Vehicular crossings of the PROW need to be to PROW specification and to be at grade as to not hinder the PROW user. For example C to D crossing the PROW Ipswich footpath 045 B2 (outline parameter plan HDL-PRP-XX-XX-DR-A-08205 REV P03)



- Hoggins is not acceptable on PROWs. Suitable surfacing to SCC PROW specification should be proposed and prior approved in writing with SCC PROW.
- Recommend that all internal recreation routes are 3m wide to accommodate pedestrians and wheelers, which will then connect into the wider network.
- From the quiet lane to area B2 (outline parameter plan HDL-PRP-XX-XX-DR-A-08205 REV P03) should be 3m wide to accommodate cyclists.



- A signing strategy will be required where the PROW network is joined or crosses, to ensure users are aware of the hierarchy, restrictions and opportunities.
- Ensure an adoptable cycle route runs through the whole site from Humber Doucy Lane (HDL) Access to the Tuddenham Road Access, to ensure the PROW footpaths that are not being upgraded are not cycled upon.

- Ipswich footpath 048 from HDL to the proposed site boundary should be surfaced to SCC PROW specification. This PROW terminates at Humber Doucy Lane opposite Kinross Road, and provision should be made to safely cross users at this point to link to the wider network and more facilities. Footpath 048 will benefit from being upgraded to bridleway to allow cycling from Humber Doucy Lane into the parcels E1 & E2.
- As there are good internal cycling routes proposed within the site and providing they link to the wider network and are at least 3m, we request for Ipswich footpath 049 to remain a footpath.
- The Fynn Valley path runs to the north of the railway line and will be a destination for walkers and connects from the proposed site by Tuddenham St Martin Bridleway 001 and Rushmere St Andrew Footpath 005. Upgrades and improvements may be required due to these routes to gain access to the Fynn Valley Path or other key destinations in Tuddenham and Westerfield.
- There appears to be no new proposed PROW routes to Westerfield or Westerfield train station. Have there been investigations to gain an off-road route to the train station or facilities in Westerfield Village and beyond?
- 106 contribution costs TBC and to follow once site visits have been undertaken to assess routes.
- More information will be required on the protection of the PROWS during the construction phases to ensure that they remain open and in a usable condition at all times.

If the above items could be addressed to meet NPPF and Suffolk County Council's Green Access Strategy (2020-2030), they could be conditioned if agreed and those conditions can follow.]

Health and Safety Executive: Site does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline.

3.3 **Ipswich Borough Council Departments (internal comments)**

- Environmental Health – Contamination:** Survey acceptable, condition for a watching brief to be included in case of any unforeseen contamination.
- Environmental Health - Private Sector Housing and Public Protection:** No Comments.
- Environmental Protection – Noise:** NIA acceptable and note that it requires further input for acoustic glazing and ventilation once the final details are known. A condition should be applied requiring the submission of glazing and ventilation details prior to full planning permission being granted. The glazing and ventilation should allow habitable rooms to meet the standards set out in our guidance note. Care to be taken over the siting of any Air Source Heat Pumps as they can give rise to noise complaints if not located and installed correctly. Ground Source Heat Pumps recommended for noise minimisation.
- Environmental Protection - Air quality:** comments include concerns around the lack of car club provision and damage costs. Mitigation measures relating to construction dust impacts to be incorporated into a Construction Management Plan.

- e. Parks and Cemeteries – Design:** The Green Trail through the development is important in this fragmented site and is assumed to have links to the Green Trail in the Core Strategy Policy CS16. Is this a planned part of the proposal and continued to the Ipswich Garden Suburb? Utility plans (shared ducts) need to be overlaid on the tree planting plans. Comments made in relation to Open Space assessment. The Tree-lined Quiet Lanes should ideally extend north to the existing mature tree lines.
- f. Countryside and Wildlife – Arboriculture:** The trees and linear hedgerow features that border the three parcels of development land are an integral part of the character and landscape of the area and looks to have been considered. The proposed village green & community orchard also looks positive. Roadside trees make a significant contribution to the character of new developments and the proposed tree lined spine road on the larger parcel of land is welcomed. Their siting and species selection should be carefully co-ordinated at an early stage, with other aspects of highway design, with sight line requirements, lighting schemes, CCTV, underground & overhead service routes and avoidance of physical obstruction or damage should all be taken into account, with due consideration for future growth and periodic maintenance requirements. Regarding the tree survey & AIA:
- Where hedgerow features are removed it is very important to mitigate this loss with significant tree & hedge planting at these junctions in order to maintain and enhance the green connectivity of the whole site, particularly where portions of high visual amenity hedge features (identified on tree survey as H006 & H017) are to be removed.
 - There are two existing TPO's in place at Westerfield House on Humber Doucy Lane - TPO No 3/2015 and TPO No 6/2019, which are important landscape features relating to the site.
 - The ancient Oak tree T056 on the junction of Tuddenham Rd & Humber Doucy Lane (although not covered by a TPO) is considered to be irreplaceable habitat and any development resulting in its deterioration should be refused, unless there are wholly exceptional reasons. No new structures, hard surfacing or gardens should be proposed with the Ancient tree buffer indicated on the AIA drawing.
 - The tree survey has also identified several Cat A Veteran English Oak trees to the Northern end of the largest parcel of development land, some within the Ipswich Borough boundary, the others appear within East Suffolk. Consideration should be given to further protect these trees with a TPO, including Ancient tree T056.
- g. Essex Place Services (Ecology):** Holding objection due to insufficient ecological information on European Protected species (bats, dormouse & Gt crested newt), Protected species (reptiles), Ancient/veteran tree (T056) and Priority species (farmland birds). Summary: Documents have been supplied by the applicant relating to the likely impacts of development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation. Comments have been made on the submitted information relating to requirements for Ecology: Protected and Priority Species; Habitats Regulations Assessment Biodiversity net Gain and post development proposals.

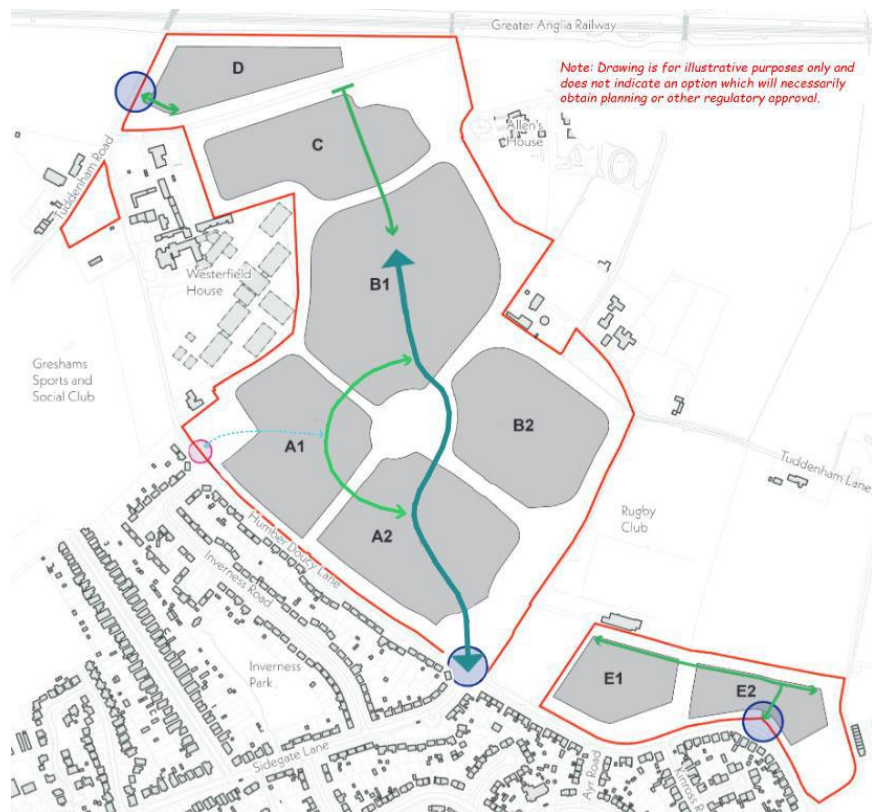
Further information is required.

In the case of approval, the LPAs will be required to secure a biodiversity gain condition as a pre-commencement requirement which should be implemented via a separate section of the decision notice. The biodiversity gain condition should secure the provision of a Biodiversity Gain Plan, as well as the finalised full Statutory Biodiversity Metric Calculation Tool. In addition, a Habitat Management and Monitoring Plan should be secured for all significant on-site enhancements, as well as off-site enhancements. This should be in line with the approved Biodiversity Gain Plan, with the maintenance and monitoring secured via legal obligation or a condition of any consent for a period of up to 30 years. The monitoring of the post-development habitat creation / enhancement will need to be provided to the LPA at years 2, 5, 10, 15, 20, 25, 30 any remedial action or adaptive management will then be agreed with the LPA to ensure the aims and objectives of the Biodiversity Gain Plan are achieved.

- h. Habitats Regulations Assessment Ipswich Borough Council and East Suffolk Council Initial Assessment (summary):** Whilst the principle of the measures described in the submitted 'Information to inform Habitats Regulations Assessment report' is in line with what would be expected to be required for a development such as this, the initial conclusion of this assessment is that there is uncertainty that the quoted area of greenspace to be delivered as part of the development is achievable. It is considered highly likely that the amount of onsite recreational greenspace will need to be reduced to account for other infrastructure requirements (particularly related to site drainage) meaning that the c.11.5Ha area quoted in the application documents won't be deliverable. It is also unclear whether this figure includes the isolated land parcel to the west of the main site. In various application documents this area is referenced as forming part of the public open space for the development. However, it is not considered that it should form part of public open space for the development and must therefore be removed from any such calculations. Adequate demonstration that the delivery of the identified avoidance and mitigation measures can be secured is necessary to be able to conclude that the proposal will not result in an adverse effect on the integrity of any European designated site. The competent authorities consider that further information is required to enable that conclusion to be reached for this application. This information must be provided before this application can be considered for a decision and must be assessed through a further iteration of this HRA. In addition to the above, it should also be noted that the application site is split between two Suffolk Coast RAMS tariff zones. The applicable tariff fee for each phase of the development will therefore need to be calculated at each Reserved Matters stage and the mechanism for this must be adequately secured in any S106 agreement for the site. Having considered the proposed avoidance and mitigation measures above, Ipswich Borough Council and East Suffolk Council consider that further information is required before it can be concluded that the project will not have an Adverse Effect on the Integrity of the European sites included within the Suffolk Coast RAMS. The authorities may not agree to the

project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) until the necessary information is provided and has been considered satisfactory through a further iteration of this assessment.

- i. **Conservation and Urban Design:** The design focus of the creation of a quality and accessible green infrastructure along the north and east sides of the site, protecting the existing 'quiet lane' environment is evident on the plans, and supported. The 'village green' concept, in principle is supported, however the conceptual layout raises concerns (particularly relating to the Humber Doucy Lane side of the development) including: i) emphasis on the rural and listed building setting of the site detracts from the existing semi-rural setting of Humber Doucy Lane. The Design and Access Statement provides little analysis of this semi-rural character, or the adjacent streets such as Inverness Road, which will experience character change as a result of the development. A wider analysis of the adjacent urban context would also be valuable. ii) There needs to be improved consistency and coherence in the treatment of the Humber Doucy Lane frontage, and clarity in the form of illustrative sketches on what will replace the existing 'rural lane' character, beyond what is shown on the block plans. These sketches should include the implied features such as footway / cycleway, screening value of retained hedges, access road, car parking and housing frontages. This is particularly important in the constrained area of the eastern smaller parcel, where road facing frontages will be important. iii) The proposal to locate a principal HDL road junction opposite Inverness Rd is likely to have a harmful effect on the special character of this part of Ipswich's residential landscape, and dismisses the special quiet suburban character of the Tarran bungalows opposite, which will likely be substantially impacted by the positioning of the main road access. iv) The layout plans incorporate some good concepts but do not appear to make the best use of space within the site, or provide a good interpretation of the local rural vernacular, as the isolation of the central green from the main spine road unnecessarily segregates elements which may rob the principle street and wider development of an important placemaking element. The central space will not be car free; the proposal places tertiary streets around its edge, probably with 'guest parking'. In the local rural context, village streets are never separated from village greens; the space is invariably adjacent to the main road and is an integral rather than separate element. A sketch below demonstrates a possible alternative arrangement where the hierarchy of density and potential local services can be reinforced through a hierarchy of spatial type. v) This shows a larger central green with the spine road running to one side and integrated into the design as a traffic calmed and attractive feature. The entry points are reversed to reduce impact on suburban street character.



vi) the layout principle of the eastern housing segment are not clear as previously raised.

3.4 **East Suffolk District Council Departments (internal comments)**

- a. **Landscape** "The majority of peripheral open space is taken up with basins and swales and the SuDS scheme needs further input from a landscape architect and ecologist to ensure effective integration into the landscape and provision of accessible, multi-functional spaces. The northern buffer needs to be expanded to provide a more generous space between the new development and the existing heritage assets, and further detail should be provided on how this area will deliver an effective transition between the urban and rural areas. The site frontage along Humber Doucy Road is particularly sensitive and further attention is needed to ensure that this area is effective. A larger set back should be provided to ensure that the new built edge does not dominate existing residential properties along Humber Doucy Lane, and the retained hedge and new tree planting have adequate space to mature. The provision of more open space along this frontage would also help to soften views from existing development along Humber Doucy Lane, which currently comprise open countryside with a vegetated backdrop. The site entrance should be located opposite Sidegate Lane to maximise sustainable connections to the town, and the access road should be reconfigured to reduce its dominance within the scheme and ensure it does not dissect green corridors wherever possible. Where there is interaction between the road and green space, further information is required to clarify how these interactions will be designed e.g., where a road crosses a key green corridor, will there be pedestrian/cyclist priority to encourage active travel over car use? The central open space needs

to be revisited to ensure that it will create the proposed 'village green' character. To better activate the space, the main access road should be included along at least one of the edges, and a rethink of building height and density within this area is required to ensure that the heart of the site feels open and spacious. Across the site, more generous areas of open space need to be provided to ensure that recreational space is not limited to linear routes and transitional spaces. Some thought should be given to the typology of spaces which should be provided and how these will interact with built edges. Opportunities should be taken to introduce a wider range of tree species within the site, ensuring that species with larger mature sizes are proposed within areas of open space to maximise ecosystems services provision. "

- b. Heritage** - "The submitted Heritage Impact Assessment is barely adequate for the purposes of paragraph 200 of the NPPF and needs to be substantially improved. The application site contributes moderately to the significance of Allens House and Laceys Farmhouse by forming a reasonably large area of its undeveloped and open, farmed, semi-rural surroundings. There will be no direct impacts arising from the application proposal on the significance of the two listed buildings. However, there will be indirect impacts arising from development within the setting of Allens House and Laceys Farmhouse, these are set out in the full comments. The principal effect arising from these impacts is a reduced ability to appreciate the relationship between the historic farmsteads and their historic and integral association with the surrounding farmed landscape. However, the farmsteads are no longer in use as farmsteads, there is limited intervisibility between them and the application site, the surroundings are already semi-rural in character, and open countryside remains to the north of these heritage assets. A low level of less-than-substantial harm has been identified to Allens House and Laceys Farmhouse. The relevant test of the NPPF at paragraph 208 needs to be engaged. The harm identified needs to be weighed up with the public benefits of the proposed development, bearing in mind paragraph 205 that states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, regardless of the level of harm identified."
- c. Design** - "These comments apply only to the parts of the application site which fall within ESC. As this is an Outline application only, there are fewer matters for consideration here, namely layout and movement, density, storey heights, and the north-eastern edge character area. The Spine Road has the character of an over-long cul-de-sac, which is unfortunate. The Spine Road is overextended and appears not to have spatial variety along its length; this approach may engender a monotonous street character, unrelieved by interaction with the central green space, for example, or any other character or landmarking features. Axial form of the green fingers allied to the formal geometry of the spine road suggest a formal approach to the shapes of parcels and perimeter blocks. This is at odds with the looser what should be a

looser, informal and organic approach to layout that I would anticipate for an edge-of-town site that abuts the open countryside. Not supportive of the general approach shown to density. The part of the layout adjacent the town and Humber Doucy Lane has been treated as identical to that part of the layout along the sensitive countryside edge to the north-east. From previous experience, where density has ended up looking very uniform across the entire development, up to and including its countryside edge is that this is a failed design opportunity. The approach to density should be revised before it is acceptable. Support the general approach within respect to storey heights. Density and storey heights need to be allied to a design approach along the countryside edge that reflects its sensitivity. This can likely be best achieved where there is a mix of storey heights along the development edge, from single storey to one-and-a-half storey with some two storey heights interspersed. As the site has very few level changes, it is essential to generate variety of form, scale and ridge heights via the parcels/perimeter blocks, to avoid monotony at scale across the development and to impart character and placemaking. North-eastern edge character area. This edge is of heightened importance, thereby, and merits special attention and design effort. The northern edge brings the development in close proximity with designated heritage assets; greater offset along the north-eastern edge would be preferable to provide an increased and improved transition from urban edge to the open countryside, taking in the setting of the close-by heritage assets." Comments

- d. Ecology** "It is considered that there is currently insufficient information submitted in relation to Habitats Regulations Assessment (HRA) matters, European Protected species (bats, dormouse and great crested newt), Protected species (reptiles), Ancient/veteran tree (T056) and Priority species (farmland birds). It therefore cannot be concluded that the proposed development will not result in adverse impacts on biodiversity contrary to NPPF paragraph 186 and East Suffolk Local Plan policy SCLP10.1. We therefore have a holding objection to this application pending the satisfactory submission of the necessary information. In addition to the above, some initial commentary in relation to Biodiversity Net Gain (BNG) requirements is also provided to assist the applicant." Holding Objection

- e. Environmental Protection** No objections in principle, however some environmental impact concerns: Land contamination: site has low risks in terms of contaminants from former site uses, recommend a single condition therefore to capture any undiscovered/unforeseen contamination should that be discovered during site development. Noise: potential for noise disturbance from the use of the rugby club facilities and events held there. farm premises identified off Tuddenham Lane could be a source of noise and odours and the final site layout should ensure the minimisation of impacts on any new residential dwellings in this vicinity. Rail Noise- concern about the areas potentially affected by rail noise to the north related to long heavy freight trains serving the Sizewell C development during a

construction phase of 10-12 years during which materials will be transported to and from site by rail. Impact will include several pass-bys taking place per day during the more sensitive night-time period. Design and mitigation must therefore take these regular night train events into account. Vibration may be an issue and would require additional survey work. Commercial and early years facilities: details too vague to comment.

f. Arboriculture - Comments included in Landscape Response.

3.5 Northern Fringe Protection Group (NFPG) – Received 23.04.2024. Objection summary: We strongly object to the Statement of Community Involvement and how our submitted response has been glossed over by the Developer. This application has not addressed our key concerns and fails to demonstrate how it will; i) comply with the Local Plan in relation to the provision of a primary school to serve the development, ii) deliver off-site infrastructure requirements in relation to travel, most notably improvements to the A1214 and Tuddenham Road, including the two road bridges either side of Humber Doucy Lane to allow pedestrians and cyclists to travel safely along Tuddenham Road from the new homes, and iii) deliver at least 15% modal shift to comply with the Local Plan. It is non-compliant with the Ipswich Local Plan and should be rejected accordingly. The Ipswich Local Plan, including Policy 4 Ipswich Strategic Planning Area (ISPA4), will need to be formally reviewed prior to this application being approved. In addition to traffic and transportation impacts, education and health requirements have not been fully addressed by the submission. The Energy and Sustainability Statement needs to recognise that new homes will need to comply with the Future Homes and Buildings Standards when they come into force.

3.6 Save our Country Spaces (SOCS) - Received 24.04.2024. Objection summary: SOCS strongly object to this application on the following grounds: The application fails to reference or adequately address SOCS concerns expressed at the public meeting in Rushmere 2023. NFPG submitted the attached to the HDL Developers Consultation, but it is not referenced in their Community Involvement document nor does it feature in their identified major issues (which we will object to):

- a. SOCS believe the application is outside the scope of the adopted Local Plan (2021) – which already has sufficient provision for homes until 2031. These homes are not needed to meet existing targets, so this application is premature.
- b. We take this to be a 'Departure' from the Local Plan. SOCS and NFPG took part in all sessions of the Local Plan Inquiry in Public, strongly argued against this site Policy IPSA4 area, as it removed the 'countryside' status and Green Rim area of Ipswich without going out for public consultation before Local Plan Submission, Reg 18.
- c. Other IGS sites delivery of vital infrastructure appear to be slipping, so this will translate to a delay for HDL site coming forward and being 'deliverable' in a timely manner.
- d. Breach of CS10 and breach of Policy IPSA4.1. The Planning Inspector imposed sequencing to the HDL development in the Ipswich Local Plan

to avoid premature applications (HDL was not intended until 2031), as there are no available school places at the primary school. Unless the developers agree to provide a new primary school on its site, this development is premature and non-compliant with the Local Plan. SOCS believe this is a breach of the Ipswich Garden Suburb SPD and Local Plan Policy CS10.

- e. If this application is passed, it may render the Local Plan out of date.
- f. It is at odds with the Levelling Up and Regeneration Act (LURA) – which emphasises the importance of using brownfield sites over high-quality agricultural land. Much of the land in this application is mostly Grade 2 (important for food production). Meanwhile, there is significant brownfield land within the Ipswich area which should be used first.
- g. There seems to be insufficient information in this application on the provision for foul drainage and the receiving environment, so SOCS contend it should have failed the validation checklist process on this point.

3.7 **Councillor and MP Representations –**

Two representations were received from Political representatives in their official capacity. No representations were received from Ipswich Borough or East Suffolk District Councillors. A summary of the comments is as follows:

Date received	Name	Position	Comment summary
18.04.2024	Sandy Martin (SCC Councillor)	object	Objection on the following grounds: 1. Full permission should not be given for access to the site when there are no clear plans of the exact access provisions proposed. 2. Details required for vehicular access: a. Traffic calming measures b. Measures to prevent vehicles using Inverness Road as a cut-through c. Safe access for pedestrians, including wheelchair users, and cyclists from the development d. An upgrade of the footway 3. Humber Doucy Lane is currently too narrow to be safe, and currently experiences regular speeding and heavy through-traffic, especially during rush-hour. Traffic calming needs to be introduced at strategic locations along the whole of HDL. 4. concealed or partly-concealed exits on the south side of HDL, and require: a. a clear strip of 2 metres on the north/east side of the trees, to enable visibility b. To replace the 2m of road surface lost, OR to make the existing narrowed HDL northbound only and introduce a southbound-only lane in the development 5. Surrounding road capacity: Tuddenham Rd is relatively broad and induces speeding traffic, with poor enforcement. The visibility on either side of both railway bridges is very poor with no pedestrian footways on much of this road. Speed reduction measures will be needed. The junction from HDL to Tuddenham Rd should be upgraded or signalised. The junction from the small parcel of development directly onto Tuddenham Rd is

			unsafe, as it is far too close to the blind bridge.. 5b) Sidegate Lane carries very heavy pedestrian and cycle access to Northgate School. Traffic calming measures will be essential. The current slip road from Colchester Road onto Sidegate Lane West should be closed. In addition there should be built-up Zebra crossings on BOTH sides of the Northgate school entrance, and Sidegate Lane West should have a 20mph limit. 5c) There need to be traffic-calming measures on the section of HDL between Rushmere Rd and Sidegate Lane. 6) A commuted sum should be made available to Ipswich Buses to return the Rushmere bus to its original 20 minute frequency on a trial basis.
23.04.2024	Tom Hunt (MP)	object	<p>Residents from Humber Doucy Lane have serious concerns regarding the increase in the rate of traffic on the stretch of Humber Doucy Lane between Playford Road and Rushmere Road, an issue that is greatly exacerbated when nearby roads or the Orwell bridge are closed which has previously resulted in hours of congestion. Residents are concerned that, given the existing lack of pedestrian footpath and the narrowness of the lane, this increase in traffic will have a detrimental impact on young people cycling and walking to Northgate High School, parents walking young children to local primary schools and horseback riders who also regularly use the lane. Residents are already facing road safety issues as well as damage to their property and the loss of pets to traffic.</p> <p>The development of a further 600 homes on Humber Doucy Lane will only worsen these circumstances, and I wish to raise my objections and opposition to the development proceeding, until such a time where a robust highway plan has been made, ensuring that traffic conditions on Humber Doucy Lane are improved.</p>

3.8 **Public representations:**

Representations from members of the public have been received against the proposal from both Ipswich Borough and East Suffolk District residents. A total of **24 objections** were received.

The following is a summary of the issues raised:

- a. Impact of additional traffic and introduction of new road infrastructure:
 - i. on existing road infrastructure in particular because of width restrictions of Humber Doucy Lane and Tuddenham Road
 - ii. on roadside parking and need for parking restrictions in Humber Doucy Lane
 - iii. Need for traffic calming

- iv. Proposed access opposite Inverness Road into Humber Doucy Lane will cause traffic problems. Access further down the lane preferable.
- v. Restricted visibility along Humber Doucy Lane from concealed exits and other safety concerns along Humber Doucy Lane, Tuddenham Road and Colchester road (speeding and poor visibility)
- vi. Proposed new access should not receive full permission because no clear plans for access layout have been supplied and are only broadly suggested
- vii. Northern bypass needs to be provided before more development is permitted
- b. Cumulative impact with other proposed development (including Ipswich Garden Suburb, Care Home, houses in The Street)
- c. Increase of increased demand on local schools
- d. Impact on surrounding natural assets, hedgerows and wildlife
- e. Potential pets in new homes will put pressure on existing wildlife
- f. Impact on rural and countryside character of the area and loss of open green spaces
- g. Loss of agricultural land and risk to food security
- h. Impact on recreational function of Fynn Valley (walking, cycling and horse riding)
- i. Impact of increased demand on GP surgeries and Hospital
- j. Bus service frequency will need to increase depending on demand
- k. Impact of development on walking, wheeling and cycling:
 - i. Inadequate existing pavement widths will suffer pressure after development
 - ii. Impact on existing Rights of Way
 - iii. Challenge of providing safe and inclusive access for walking and wheeling.
 - iv. Proposed modal shift to walking, cycling and public transport is unrealistic
- l. Impact on the Rugby Club and loss of sports facilities – with no alternative provision proposed
- m. Further development should be on brownfield sites only
- n. No need for further housing provision
- o. Visual and character impact on Seven Cottages Lane (designated quiet lane)
- p. Proposed development is profit-driven, not people and nature-centred
- q. Air quality/pollution impact from increased traffic and tree removal
- r. Impact on water and sewerage system

4. Policy

The following is a summary of the relevant Policies and Guidance used to assess the proposals.

4.1 National Planning Policy

National Planning Policy Framework (2024)

4.2 Local Planning Policy

This comprises of two Development Plans across the site, covering East Suffolk and Ipswich Borough Council. Included within the East Suffolk Development Plan is the Rushmere St Andrew Neighbourhood Plan (made 28 June 2023).

East Suffolk Council Suffolk Coastal Local Plan (2020)

Policy SCLP3.1: Strategy for Growth
Policy SCLP3.2 - Settlement Hierarchy
Policy SCLP3.5 – Infrastructure Provision
Policy SCLP5.8 – Housing Mix
Policy SCLP5.9 – Self Build and Custom Build Housing
Policy SCLP5.10 - Affordable Housing on Residential Developments
Policy SCLP7.1 - Sustainable Transport
Policy SCLP7.2 - Parking Proposals and Standards
Policy SCLP8.2 - Open Space
Policy SCLP9.2 - Sustainable Construction
Policy SCLP9.5 - Flood Risk
Policy SCLP9.6 - Sustainable Drainage Systems
Policy SCLP9.7 - Holistic Water Management
Policy SCLP10.1 - Biodiversity and Geodiversity
Policy SCLP10.2 - Visitor Management of European Sites
Policy SCLP10.3 - Environmental Quality
Policy SCLP10.4 - Landscape Character
Policy SCLP11.1 - Design Quality
Policy SCLP11.2 - Residential Amenity
Policy SCLP11.3 - Historic Environment
Policy SCLP11.4 - Listed Buildings
Policy SCLP11.6 - Non-Designated Heritage Assets
Policy SCLP11.7 - Archaeology
Policy SCLP12.24 - Land at Humber Doucy Lane

Rushmere St. Andrew Neighbourhood Plan

Policy RSA1 – Planning Strategy
Policy RSA 2 – Land at Humber Doucy Lane
Policy RSA 3 – Protection of Landscape Character and Important Views
Policy RSA 4 – Protection of Trees, Hedgerows and other Natural Features
Policy RSA 9 – Design Considerations
Policy RSA 11 – Open Space, Sport and Recreation Facilities
Policy RSA 12 -Public Rights of Way

Ipswich Core Strategy and Policies DPD (2022)

Policy ISPA 4 - Cross Boundary Working to deliver Sites includes ISPA4.1
Land at Northern end of Humber Doucy Lane
Policy CS1 - Sustainable Development (relating to the tackling of climate change and consideration of its implications);

Policy CS2 - The Location and Nature of Development (principle of development of an allocated site);

Policy CS4 - Protecting our Assets (protection of heritage and agricultural assets);

Policy CS5 - Improving Accessibility (improving access by foot, bicycle and public transport);

Policy CS7 - The Amount of New Housing Required (development to meet the minimum unit requirement in the allocation);

Policy CS8 - Housing Type and Tenure (development is expected to provide a mix of dwelling tenure, types and sizes, including self build or custom build);

Policy CS12 - Affordable Housing (development is required to provide 30% of affordable housing as per ISPA4.1);

Policy CS15 - Education Provision (the need for Primary School and Early Years provision to be addressed);

Policy CS16 - Green Infrastructure, Sport and Recreation (replacement sports facilities, meeting open space standards and functional links to the Ipswich 'green trail');

Policy CS17 - Delivering Infrastructure (demonstrate that infrastructure requirements needed to support the development can be met);

Policy DM1 - Sustainable Design and Construction (meet the targets for CO2 emissions reduction and water efficiency);

Policy DM2 - Decentralised Renewable or Low Carbon Energy (provision of minimum 15% of energy requirements from decentralised and renewable or low-carbon sources);

Policy DM3 - Air Quality (Air Quality Assessment and Construction Management Plan requirement);

Policy DM4 - Development and Flood Risk (site specific Flood Risk Assessment (FRA) and Sustainable Drainage provision);

Policy DM5 - Protection of Open Spaces, Sports and Recreation Facilities (development could involve the loss of existing sporting facilities);

DM6 - Provision of New Open Spaces, Sports and Recreation Facilities (requirement for provision in new development to standards);

Policy DM7 - Provision of Private Outdoor Amenity Space in New and Existing Developments (private outdoor amenity space standards);

Policy DM8 - The Natural Environment (inter alia Biodiversity Gain, Habitats Regulations Assessment and RAMS requirements).

Policy DM9 - Protection of Trees and Hedgerows (protection and replacement of trees and hedgerows on site);

Policy DM10 - Green and Blue Corridors (site located on the edge of Green Corridor D in Plan 6);

Policy DM12 - Design and Character (consideration of character context and design of site layout and housing)

Policy DM13 - Built Heritage and Conservation (consideration and protection of affected heritage assets);

Policy DM14 - Archaeology (Archaeological evaluation and mitigation requirements);

Policy DM18 - Amenity (Amenity considerations for occupiers and neighbours of the development);

Policy DM21 - Transport and Access in New Developments (Transport Assessment of impacts on existing infrastructure);

Policy DM22 - Car and Cycle Parking in New Development (Minimum standards for the provision of car parking and cycle storage)
 Policy DM23 - The Density of Residential Development (development density of at least 35dph is required)
 Policy DM24 - The Protection and Provision of Community Facilities (potential loss of playing field)
 Policy DM32 - Retail proposals outside defined centres (requirements for allowing retail proposals outside defined centres);
 and
 Policy DM34 - Delivery and Expansion of Digital Communications Networks (provision of up to date digital communications technology)

4.3 Other Planning Guidance

DCLG Technical Housing Standards (2015)

Suffolk County Council's Green Access Strategy (2020-2030)

Suffolk Guidance for Parking – Technical Guidance (2023)

Suffolk Coast RAMS SPD (2020)

Suffolk Design Streets Guide

Suffolk Flood Risk SuDS– A Local Design Guide

Suffolk Design – Suffolk Design Management Process

Biodiversity Net Gain Planning Guidance Note for Suffolk

Suffolk County Council Section 106 Developers Guide to Infrastructure Contributions in Suffolk (2014) *(likely to be updated this year)*.

Ipswich Urban Character Study – North East Character Area (2019)

IBC Space and Design Guidelines SPD (2015)

IBC Public Open Space SPD (2017)

IBC Cycling Strategy SPD (2016)

IBC Development and Flood Risk SPD (2016)

IBC Low Emissions SPD (2021)

Suffolk Coastal Landscape Character Assessment (2018)

Suffolk Coastal Settlement Sensitivity Assessment (2018)

East Suffolk Affordable Housing SPD (2022)

East Suffolk Sustainable Construction SPD (2022)

East Suffolk Historic Environment SPD (2021)

East Suffolk Custom and Self-Build Housing SPD (Draft, expected adoption 2024)

East Suffolk Healthy Environments SPD (Draft, expected adoption 2024)

East Suffolk Cycling and Walking Strategy (2022)

5. Planning Assessment

- 5.1 Under the provisions of Section 38 of The Planning and Compulsory Purchase Act 2004 ('The 2004 Act'), the determination of planning applications must be in accordance with the approved development plan unless material considerations indicate otherwise. The development plan for the Borough of Ipswich is the Core

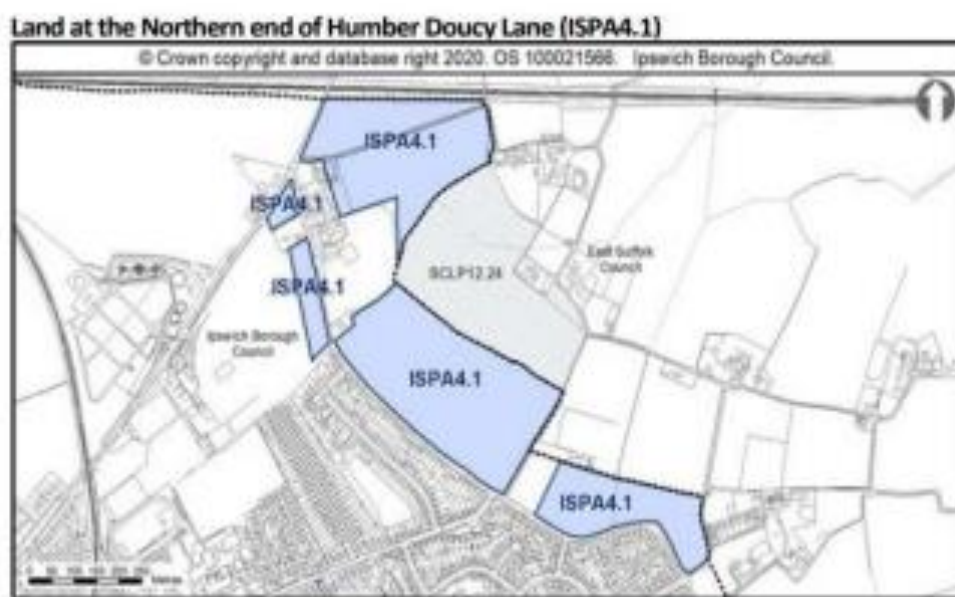
Strategy and Policies DPD Review (March 2022) and the Ipswich Site Allocations (Incorporating IP-One AAP) DPD Review (March 2022) which comprise the Ipswich Local Plan March 2022.

- 5.2 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 5.3 Based upon the conclusions of the DM/2024/0005 EIA Screening Opinion, the development proposed is not considered an EIA development and the application does not require the submission of a supporting Environmental Statement. This is subject to the mitigation and assessment material identified within the screening opinion and is considered as part of the assessment of this application.
- 5.4 The main considerations in the assessment of this application are listed below and are covered in more detail in the remainder of this report:-
 - Principle of Development
 - Quantum of Development and Housing Mix
 - Parameter Plans and Masterplan
 - Design, Height, Density and Layout
 - Secure by Design
 - Public Open Space
 - Affordable Housing and Viability
 - Infrastructure
 - Education
 - Health
 - Impact on Neighbouring Residents
 - Residential Quality including Noise and Vibration
 - Transport and Parking
 - Flooding and Surface Water Drainage
 - Energy and Sustainability
 - Landscape and Visual Impact
 - Heritage Assets
 - Trees and Hedgerows
 - Ecology and Biodiversity Net Gain
 - Habitat Regulations Assessment (HRA)
 - Archaeology
 - Air Quality
 - Railway Line Impacts
 - Loss of Sports Pitches

- Contamination and Ground Conditions

Principle of Development

- 5.5 The principal policy for the application site is Policy ISPA4 – Cross Boundary Working to Deliver Sites (ISPA4.1) This proposal allocates 23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, for the provision of 449 dwellings and associated infrastructure, to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site.



- 5.6 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure. Overall, the cross-boundary allocation is estimated to deliver 599 dwellings. The policy anticipates 30% affordable housing (unless viability assessment indicates otherwise) in accordance with policies CS8 and CS12. The results of the Whole Plan Viability Assessment testing show that the scheme is viable with 30% affordable housing.
- 5.7 The policy also recognises the role of the site as being located in a zone of transition and the importance of maintaining settlement separation. It anticipates the use of green infrastructure to maintain separation between Ipswich and the more rural landscape character of East Suffolk. The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site as well as considering non-designated assets identified in the Heritage Impact Assessment (September 2020). A future planning application will require a Heritage Impact Assessment to demonstrate how the effects on heritage assets have been taken into account and mitigated.
- 5.8 Other requirements of ISPA4 includes:

- High quality design in accordance with Policy DM12
- An Archaeology Assessment
- Site specific Flood Risk Assessment;
- Maintaining TPO trees;
- Primary school places and an early years setting to meet the need created by the development;
- Replacement sports facilities if required to comply with Policy DM5, other open space in compliance with the Council's Open Space Standards set out in Appendix 3 of the Core Strategy DPD and links to the Ipswich 'green trail' walking and cycling route around the edge of Ipswich;
- A project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs);
- Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside;
- Transport measures including:
 - o highway and junction improvements on Humber Doucy Lane and Tuddenham Road;
 - o walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;
 - o public transport enhancements; and
 - o appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy
- As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and
- A financial contribution to off-site healthcare facilities.
- The development will need to be phased and delivered in accordance with Ipswich Garden Suburb.

5.9 The cross boundary site in Ipswich Borough and East Suffolk is supported in principle through the allocations in both the adopted Ipswich Local Plan (2022) Policy ISPA4 and 4.1 and the Suffolk Coastal Local Plan (2020) Policy SCLP 12.24. These policies were developed through joint working by officers and detail the requirements relating to each element of the site by district.

5.10 The Housing Delivery Test (HDT) results for 2022 were published on 19 December 2023 by the Department for Levelling Up, Housing and Communities (DLUHC)¹. Under the NPPF (2023), local planning authorities (LPAs) who fail to deliver their plan-led targets will face sanctions. Ipswich Borough Council scored 116% on their Housing Delivery test. Given that Ipswich Borough Council can currently demonstrate a five-year housing supply, and have an up to date Local Plan, this means that it is not necessary to apply the presumption in favour of sustainable development. As a result the Council is not subject to any sanctions arising.

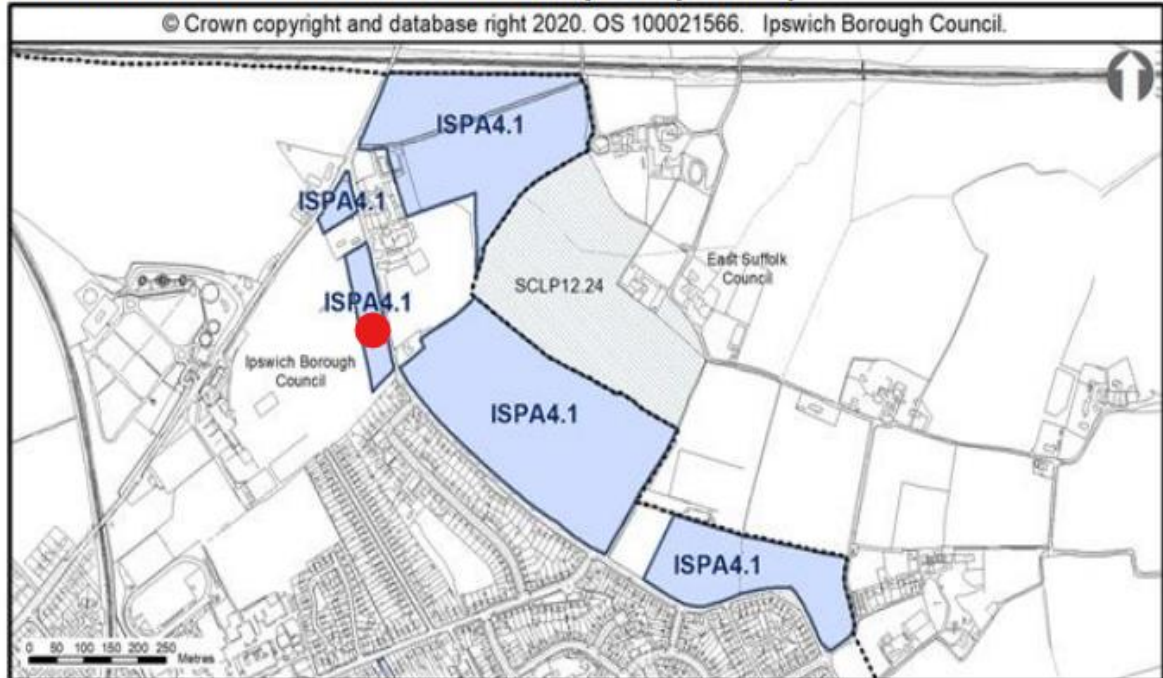
- 5.11 The NPPF states that plans, and decisions, should apply a presumption in favour of sustainable development. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.12 In 2022 Ipswich published their Housing Delivery Action Plan 2022, The Action Plan sets out the priority for delivering 8,280 new homes Borough wide by 2036.
- 5.13 On 23rd March 2022 Ipswich Borough Council adopted its current Local Plan which looks forward 15 years and allocates land for future housing and employment growth along with planning for infrastructure to support it. The 2022 Local Plan already has a 20% buffer in place although this is subject to on-going review. The Local Plan also has a function to provide the spatial delivery of all corporate plans and strategies. With the publication and adoption of the of the 2022 Local Plan, a 5-year land supply has been established and satisfies the Government's requirement for all local authorities to have an up-to-date Local Plan by December 2023. This has also been shown through the published Housing Delivery Test for 2022.
- 5.14 Also of note is the fact the site has come forward earlier than anticipated in the housing trajectory (2030/31- 2035/36 - years 11 to 15 of the local plan). This is not necessarily an issue in itself but when considered with the Borough's current housing supply, the Borough's need for housing means it does not weigh heavily in favour of an application in order to assist with delivery of development. The development is considered acceptable in this location in principle but further consideration is required as to how the proposal meets the requirements laid out in both Suffolk Coastal Local Plan Policy SCLP 12.24 and Ipswich Local Plan Policy ISPA4.

Quantum of Development and Housing Mix

- 5.15 Outline planning permission is sought for the development of up to 660 dwellings on 31.53ha. Policy ISPA4 allocates 23.28ha of land for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated within the East Suffolk boundary under Policy SCLP12.24 (for 150 homes on 9.9 ha). Overall, the cross-boundary allocation is proposed to deliver 599 homes across the parcels of land shown in the plan below taken from the IBC

Local Plan. Important to note that the 599 is allocated across more land than is included in this application, the application does not include the allocation parcel to the west of Humber Doucy Lane and highlighted with a red dot in the plan below.

Land at the Northern end of Humber Doucy Lane (ISPA4.1)



5.12 Policy ISPA4 identifies that 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure. It is from these proportions and by applying an average housing density of 35 dph that the proposed housing figure of 660 is reached. However the Local Plan allocation was evidenced and carefully considered. The proposed number of dwellings exceeds this number of dwellings by 60 and does not include all the land allocated in the policy (approx. 1.65 ha of land which is shown in the allocation does not form part of this application).

5.13 Policy CS8 identifies that the Council will plan for a mix of dwelling types in order to achieve strong, vibrant and healthy communities. In doing so all major schemes will be expected to provide a mix of dwelling types and sizes which takes into account the needs identified through the current Ipswich Strategy Housing Market Assessment and any other evidence of local needs supported by the Council and the policies of this plan. No housing mix has been proposed at this stage.

5.14 Policy CS8 Housing Type and Tenure state that the Council will support Self Build, Custom Build and Co-Housing developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough. In considering major development applications, the Council will consider the currently

applicable Self Build Register and whether provision should be included within the development. Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building (which may or may not be meeting affordable housing need). They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. This duty is reflected through paragraph 70(b) of the NPPF 2023 which state that local authorities should seek opportunities, through policies and decisions, to support small sites to come forward for ... self-build and custom build housing. Furthermore, the LURA has strengthened our duties around self-build / custom build.

- 5.15 As of 30 October 2023, there remains a residual requirement to grant consent for at least 31 serviced plots within the Borough. Given our current deficit, it would make sense to assign greater weight to fulfilling this need. The Annual Self-build and Custom Build Report provides detailed information on the demand profile, which can inform discussions with developers regarding this site. It is noted that the findings of the Whole Plan Viability Assessment, which identified Humber Doucy Lane as situated within a high-value zone compared to other housing allocations in Ipswich. Therefore, this location is more viable for self-build and custom build projects. Additionally, the viability report indicates that self-build and custom build costs can be passed on to the owner-occupier without impacting developers' profits.
- 5.16 It is noted that the number of houses proposed exceeds the land allocation quantity by just over 60 houses and across a smaller site area. No information is provided on the mix or type of housing. Although a need for self-build and custom-build houses is recognised along with securing an appropriate mix of housing that suits local demands and should be considered at the appropriate stage.
- 5.17 The exceedance of the housing number allocated for the site is not in itself an issue provided other requirements for land use and standards for development can be met. It is however noted that in forming a view on the number of houses which were appropriate for the site at the Local Plan Stage, extensive consideration was given to the needs of the development and potential impacts on the site's surroundings. It is likely that the exceedance of the 599 number specified in the policy will cause concern for other considerations in relation to providing adequate green space, drainage, separation to the rural edge and protection of heritage assets.

Parameter Plans and Masterplan

- 5.18 Local Plan policy ISPA4 is clear that the site should be masterplanned to bring forward the development in a coordinated and comprehensive manner. By masterplanning the site, all aspects of the development can be considered

holistically, such as infrastructure, transportation, social amenities, open spaces, and building design. This can result in a more cohesive and integrated development that enhances the overall quality of the area and creates a sense of place. Additionally, masterplanning can help to ensure that the development is sustainable and resilient, taking into account factors such as climate change, flood risk, and biodiversity. Therefore, the lack of a comprehensive masterplan for the site is a missed opportunity to create a truly successful and thriving development.

- 5.19 The masterplan should set out the layout, scale, landscaping, and appearance of the entire site, including any public spaces and infrastructure. This should be used to shape the reserved matters applications and inform conditions compliance. The Design and Access Statement contains some master plan elements and is labelled as such, but should be a separate document and include additional detail as set out in this response.
- 5.20 The developer's ability to justify increased housing numbers and assess the impact on the setting of listed buildings, Special Landscape area, existing trees, and hedgerows requiring retention is contingent on the submission of a detailed Masterplan (not included in this application). Furthermore, the adopted Ipswich Local Plan mandates the maintenance of separation between Ipswich and surrounding settlements, as well as a transition between the urban edge of Ipswich and the more rural landscape character of the East Suffolk side. The higher housing numbers could potentially create a harsher urban edge, which is not suitable for this location.
- 5.21 The submission does not include any justification for the higher numbers and how this can be achieved whilst meeting Local Plan policy requirements. The Design and Access Statement contains a loose Humber Doucy Lane Master Plan which includes eight neighbourhoods and three new access routes onto Humber Doucy Lane. The access proposals have ignored the joint authority request to explore the possibility of utilising the existing Rugby Club Access. This would reduce the accesses onto Humber Doucy Lane to one associated with the main spine road to serve the development. Part of the A1, B1 and C Housing neighbourhood areas will have a particular impact on the setting of Westerfield House and will require careful design.
- 5.22 The planning application has been accompanied by a set of Parameter Plans which limit the scale, location and quantum of development. The Parameter Plans provide a very basic level of information which would form the basis of any planning permission and would be used to inform the more detailed reserved matters applications which would follow. An assessment of each of the parameter plans in terms of their proposals and acceptability will be discussed in more detail in the relevant sections of this assessment.
- 5.23 The absence of a masterplan is contrary to local plan policies and limits the ability to ensure the development which comes forward is coordinated and comprehensive. The proposals therefore fail to meet the requirements of ISPA4 and it cannot be demonstrated that other matters including, but not limited to amenity and connectivity can be secured. The proposal is therefore also contrary

to Policies DM12 and DM18 in this regard.

Design, Height, Density and Layout

- 5.24 Whilst the road, green space and development parcel layout of the main development plot reflects the need for a focal space, and this is welcome. There is concern, this is not necessarily the best use of space within the site, or a good interpretation of the local rural vernacular. In particular, the isolation of the central green from the main spine road is a segregation of elements which may remove an important placemaking element from the principal street and wider development. It is also considered that the central green space should be larger to be an appropriate focal point of a development of this scale.
- 5.25 The spine road also appears to have no destination and terminates in what appears to be an arbitrary position in the layout. Its character is that of an over-long cul-de-sac - which is very unfortunate. In addition, the over-extended spine road appears not to enjoy any spatial variety along its length. There is the danger that this form engenders a monotonous street character along its length, unrelieved by interaction with the central green space, for example, or any other character or landmarking features.
- 5.26 The axial form of the green corridors, together with the formal geometry of the spine road, suggests a very formal approach to the shapes of parcels and perimeter blocks. Such an approach appears at odds with what should be a looser, informal and organic approach to layout that would be anticipated for an edge-of-town site that abuts the open countryside.
- 5.27 With regards to scale of buildings there is support of the general approach to storey heights which increase towards the centre of development and reduce along the north-eastern countryside edge. It is noted however that density and storey heights need to be allied to a design approach along the countryside edge that reflects its sensitivity – such as avoiding continuous built form, avoiding roads as edges, ensuring a loose, spacious and varied building line, and allowing green space to come right up to the development edge. This can likely be best achieved where there is a mix of storey heights along the development edge, from single storey to one-and-a-half storey with some two storey heights interspersed. In addition it is noted that in relation to storey heights more generally the site has very few level changes, and so variety of form, scale and ridge heights via the parcels/perimeter blocks, is necessary to avoid monotony at scale across the development and to impart character and placemaking. The height of buildings around the central green space will also need to be carefully considered to ensure the space is not overly enclosed or dominated by the height of built development around it, especially when considered in relation to the size of the space.
- 5.28 Local Plan Policy DM23 sets out the expectations for density within new developments in Ipswich. Due to its location a density of least 35dph is required. There is a concern that that the increase of density towards the centre of the layout and decreases towards the edges and is identical for the rest of

the layout, as if that part of the layout adjacent to the town and Humber Doucy Lane is identical to that part of the layout along the sensitive countryside edge to the north-east. The parameter plan for density is of concern as density across the site could end up appearing very uniform and a more bespoke approach to the parameters of the proposed development along the rural edge is required.

- 5.29 In conclusion, it is noted that certain concerns raised in relation to design, scale, density and layout will be addressed at the detailed design stage, however there are some issues being raised by the proposed parameter plans which are likely to cause issues when securing those details. These concerns include: the location and layout of the spine road; the size of the central open space and density and height of housing in relation to it; the density and height of development along the rural edge; and ensuring there is more variation in building height across the site and in particular along the spine road to ensure the development does not appear monotonous and lacking in character. Public Open Space is a significant factor in the Layout of the development, concerns in relation to the sizes, types and qualities of these spaces are addressed in more detail in the relevant section.

Secure By Design

- 5.30 Section 17 of the Crime and Disorder Act 1998 places a duty on authorities to exercise its various functions with due regard to the likely effect of those functions on, and need to do what it reasonably can, to prevent crime and disorder in its area. In this respect the LPA has given consideration to the perceived safety and security issues raised by the Suffolk Constabulary Design Out Crime officer.
- 5.31 The NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas. Paragraph 135(f) states planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users: and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.32 Suffolk Constabulary does not object to this application but does advise that a statement of crime prevention is required to be included with the full application and should include reference to Secured By Design (SBD) Homes 2024, detailing how issues such as the layout of the whole development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control where appropriate, secure cycle storage provision and lighting have taken crime prevention guidance into account.
- 5.33 Given the detail available at this stage of the application process, it is not possible to ascertain whether the development would adhere to the secure by design principles. Consideration will be required at the reserved matters stage when

more details are available.

Public Open Space

- 5.34 Policy DM6 sets out the requirements for new open spaces, sports and recreation facilities within new residential developments of 10 or more dwellings. Within the policy it states that the design and layout of spaces should be delivered in accordance with the detailed design criteria set out in the Public Open Spaces Supplementary Planning Document (SPD) (2017).
- 5.35 In support of the application an Open Space Assessment has been submitted alongside a section within the Design and Access statement which sets out the background to the open space proposals. The submitted Parameter plans and in particular the Land Use Parameter Plan and Green & Blue Infrastructure Parameter Plan are informed by these documents and provide the proposed framework from which more detailed proposals for open space will be developed from.
- 5.36 For a development of this size based on a 2.4 per dwelling population, the following open space requirements are considered necessary based on the relevant policy criteria.

Open Space typology	Policy requirement	Requirement for proposal (based on 2.4 persons per dwelling)	Proposed
Parks and Gardens	1.16 ha per 1000 pop	1.84 ha	0.80 ha
Amenity Green Space	0.48 ha per 1000 pop	0.76 ha	0.87 ha
Natural and Semi Natural Green Space	1.53 ha per 1000 pop	2.42 ha	9.56 ha
Outdoor Sports facilities	1.42 ha per 1000 pop	2.25 ha	0
Provision for children	0.08 ha per 1000 pop	0.13 ha	0.13 ha
Provision for Young People	0.04 ha per 1000 pop	0.06 ha	0.08 ha
Allotments	0.41 ha per 1000 pop	0.65 ha	0
		Total = 8.11 ha	Total = 11.44 ha

- 5.37 The submitted Open Space Assessment identifies an over-provision of sports facilities and allotment space within this part of Ipswich. Therefore the open space provision proposed has focussed on providing all typologies in the proposed development, with the exception of sport facilities and allotment space.
- 5.38 The total quantum of open space proposed is in excess of the total open space required by policy. However there are certain open space typologies which are

underprovided or not provided at all as seen in the table above.

- 5.39 Parks and Gardens open space typology has been underprovided by 1 ha. It is advised by the applicants that the small deficit in the Parks and Gardens category is compensated for by a large over-provision in Natural and Semi-natural open space typology which is proposed and which is reasoned, as more suitable to the character of the site, given its rural edge location.
- 5.40 Parks and Gardens space is intended to provide a different function to other forms of open space particularly Natural and Semi-natural green space. With reference to the SPD it is apparent that whilst both types of spaces are intended for informal recreation, they are designed and used recreationally in different ways. The natural green spaces are more focussed on enhancing and protecting wildlife and therefore encourages informal recreation such as walking, bird watching and nature tours. The Parks and Gardens have a more formal design and more structure in design through benches and paths. These types of spaces are expected to encourage more community focussed events and spaces such as bandstands or mown grass / lawns for ball games and picnics. The central green and corridor spaces immediately leading to the central green are identified for this Parks and Greens typology.
- 5.41 The location of this typology in the centre of the development to create a Central Green is logical and forms a heart to the development, however there are areas of the development particularly periphery parcels C, D, E1 and E2 which would benefit to better access to Park and Garden open space. Parcel B1 which is a particularly large residential parcel with no green space identified within it would also benefit from more formal green space such as Park and Garden space being designated within it.
- 5.42 The locations of LEAP and MUGA areas are generally located to outer edges of the development within the green edges. There is a concern that that these will not be fully integrated within the development and will lack surveillance and become isolated from the main residential areas.
- 5.43 Suds should be well integrated into the landscaping scheme and green infrastructure provision of the development, and should contribute to the overall design quality of the scheme. It is noted, that significant areas of the green infrastructure identified in the DAS is to be used for Suds provision and at present there is a concern that the design of the suds swales and basins appear overly engineered with 1 in 4 gradients which means they are not accessible to all. If dry basins are proposed then they should have shallower access points to enable access. The permanently wet basin could provide an attractive ecological feature, but presently is too small to provide any meaningful benefit. It is advised that the suds design and layout needs to be revisited, with the input of a landscape architect and ecologist, and a more creative approach should be taken to ensure they are well integrated into the landscape.
- 5.44 More generally the open space of all types are arranged around the edges or in a linear arrangement through the development. It appears to serve more as transitional space alongside pedestrian and cycle movement corridors, meeting

functional requirements for SuDS and creating the necessary buffer space between new development and rural edge, rather than designing into the development meaningful and useable space.

- 5.45 Although the parameter plans contain some welcome recommendations for the Humber Doucy Lane frontage, such as the retention where possible of the existing hedgerow, there is a lack of consistency and coherence in the treatment of this edge, showing what will replace the existing (highly valued) 'rural lane' character. The green space, access and housing block plans imply multiple features: a footway / cycleway, retained hedge, access road and housing frontages. The green area shown on the open space parameter plan is narrow and needs to be more generous in order to protect the sensitive character of Humber Doucy Lane.
- 5.46 The proposed Green & Blue Infrastructure Plan fails to demonstrate that a suitable range of open space will be provided and fails to demonstrate that the spaces which are proposed will be well overlooked, meaningful, useable and suitably distributed throughout the site. There is also concern with the lack of green spaces shown along the edges of the development to Humber Doucy Lane and along the rural edge. In summary the proposals in relation to Public Open Space are considered contrary to Local Plan Policy DM6 and the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017).

Affordable Housing and Viability

- 5.47 ISPA4 identifies that this development will be expected to deliver at least 30% affordable housing (unless viability assessment shows otherwise) in accordance with policies CS8 and CS12. The mix and tenure types of housing will be determined through the master planning process. For IBC, it is anticipated that 30% of the housing should be affordable, this is because the Whole Plan Viability Assessment found that the site should be viably able to support the range of on and off-site infrastructure costs required in the policy. Provision of 30% affordable housing would also make a meaningful contribution to meeting affordable housing needs in Ipswich.
- 5.48 There is some concern that the application form states that only market housing would be provided in the scheme, although the Affordable Housing delivery Statement and Heads of Terms included as part of the Planning Statement propose the provision of Affordable Housing would be in line with policy requirements. Elsewhere in the Planning Statement states that the applicant is not able to confirm a definitive number of affordable housing homes (para. 3.17) but an average of 31% is assumed based on a policy compliant average between IBC's requirement of at least 30% and ESC 33%) anticipates that it likely to be at 31% and a higher proportion of this would be in Ipswich, comprising of a mix of rented and intermediate home ownership tenures. No viability assessment has been submitted to support a proposal to provide a lower than policy requirement for Affordable Housing.
- 5.49 Policy CS12 (Affordable Housing) requires at least 60% of affordable housing provision shall consist of affordable housing for rent including social rent and the

remainder affordable home ownership. It is noted that the presumption will be in favour of on-site provision rather than the payment of commuted sums in lieu of provision. Affordable housing should be integrated in developments and should not be distinguishable from market housing. The S106 agreement would need to specify the tenure mix to be provided. This has not been proposed as part of the Heads of Terms. The integration of the Affordable Housing within the development would be a matter to be determined through the detailed design stage.

5.50 Policy CS8 (Housing Type and Tenure) sets out the Council's aim to plan for a mix of dwelling types to be provided, in order to achieve strong, vibrant and healthy communities. With regards to affordable housing provision, it notes that the most appropriate type, size and mix for each development will be guided by the Council's Affordable Housing Position Statement, where it remains up to date, and the particular characteristics of the site.

5.51 The Heads of Terms submitted with the application does not set out the provision of Affordable Housing in terms of type, size and mix to be secured. It therefore cannot be determined whether the Affordable Housing provision proposed and to be secured as part of the development aligns with the Council's Affordable Housing Position Statement and whether it is appropriate to the particular characteristics of the site.

5.52 The 31% affordable housing provision suggested within the supporting Planning Statement is supported in principle, however the lack of definitive numbers is concerning. No details of Affordable Housing tenure mix, size and type is provided so unclear whether proposals would meet the requirements of relevant policies CS8 and CS12. The application proposes this is subject to more detailed discussions as part of the S106 agreement, however at this stage in the absence of more detailed and definitive proposals in relation to the amount, type, mix and size of Affordable Housing provision it would have to be concluded that the proposals are contrary to Local Planning Policies IPSA4, CS8 and CS12.

Infrastructure

5.53 Local Plan Policy IPSA4 sets out criteria which are expected to be complied with, within the development and criteria f) includes the infrastructure requirements identified at the time of the policy (the policy does note that this is subject to additional infrastructure identified as part of the Planning application process).

5.54 The infrastructure requirements identified include

- i) Primary school places and an Early years setting to meet the need created by the development;
- ii) Replacement sports facilities if required to comply with policy DM5, open space and links to the Ipswich 'Green Trail'
- iii) A project HRA will be required and SANGS;
- iv) Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green

infrastructure both on and off the site in its vicinity as appropriate, include a 10% BNG and provide a soft edge to the urban area where it meets the countryside;

- v) Transport measures including:
 - highway and junction improvements on Humber Doucy Lane and Tuddenham Road;
 - walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;
 - public transport enhancements; and
 - appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy;
- vi) Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity is provided to meet demand generated from the strategic allocation at the northern end of Humber Doucy Lane;
- vii) The development will be triggered by the ability to provide the necessary primary school capacity on the Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;
- viii) As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and
- ix) A financial contribution to off-site healthcare facilities.

5.55 The above infrastructure requirements identified, will be considered in the relevant sections of the assessment to follow. Point viii) is covered in more detail here.

5.56 Point viii) sets out a requirement to consider the opportunity for the provision of convenience retail on site as part of the master planning work. As part of this consideration, account needs to be taken of the effects on the viability of existing local retail facilities.

5.57 A Retail Impact Assessment (RIA) has been submitted in support of the application. The submitted RIA provides a policy basis for the work and applies a sequential test as required by Policy DM32 of the Local Plan and NPPF where retail is proposed outside of defined centres. Consideration for the type of shopping needs for the scale of development proposed and how existing shopping facilities may meet this need is also set out within the RIA.

5.58 The RIA concludes that the application site is the most appropriate location in which to meet the need that the application scheme aims to fulfil and that the proposals pass the sequential test to satisfy the requirements of Policy DM32 and the NPPF.

- 5.59 The proposed development includes 400sq.m.(net) of non-residential floor space falling within use class E and / or use class F2(b). Such use classes refer to potential uses such as small- scale retail use, café, service use and/or community use. The RIA has undertaken a worst case scenario of all 400 sq.m being used for convenience retail in order to assess impacts on existing local retail provision.
- 5.60 In terms of impact on existing retail provision, the East of England Coop at Colchester Road and Selkirk Road local centres were considered as being closest to the application site and of comparable size. The size and distance of the retail provision in each case were assessed and it was concluded that the level of trade draw and resulting impact from the proposed development was not considered to be a 'significant adverse impact' on either of the stores.
- 5.61 It is considered that the opportunity for providing convenience retail has been assessed as required by policy ISPA4. The conclusions of the RIA demonstrate that a sequential test has been satisfied in accordance with policy DM32 and NPPF, and that the proposed development would not impact on any existing, committed and planned investment and there would be no significant adverse impact on the vitality and viability of either local centre. The RIA also demonstrates that the proposals to deliver new retail floorspace within the development would meet residents day-to-day needs and this will promote more sustainable shopping patterns by reducing travel demand.
- 5.62 Subject to suitable conditions (limiting size and use), the potential for retail provision within the development is considered acceptable and in accordance with planning policy ISPA4 and DM32.

Education

- 5.63 The SCC response to the application identifies that the new schools (primary and high schools) proposed at the Ipswich Garden Suburb will serve the new residents of this development.
- 5.64 This is contrary to the assumptions made by the applicant within the application whereby, it is assumed that the new residents will attend existing schools at Rushmere Hall Primary and Northgate High School.
- 5.65 The design of the site and assumptions included within supporting assessment contradict the advice received from SCC in response to the planning application and could affect the mitigation required in terms of provision of transport connections and improvements, as well as contributions to education infrastructure.
- 5.66 In terms of education provision it is apparent there are options available for which funding could be secured via a S106 agreement or through CIL. However clarity is required as to which schools should be assumed for this development so that it can be design with these key destinations in mind.
- 5.67 If the schools at Ipswich Garden Suburb are concluded to serve this development

then phasing of this development alongside their provision (given that the IGS schools do not yet have planning permission) will be required in accordance with Local Plan policy ISPA4.

Health

- 5.68 The site is located within the catchment of the Two Rivers Medical Centre, 1.8 km to the south, where primary health care would be prescribed. There are regular bus services along Humber Doucy Lane to the health centre. The development is at a scale where the demand on health care services would need to be mitigated, by means of a financial contribution towards off-site facilities. Policy ISPA4 includes this provision within the supporting text. Active Travel England have expressed concerns about the limited contribution through cycling routes contributions to Ipswich Town Centre and other community facilities such as the Two Rivers Medical Centre.
- 5.69 Suffolk and North East Essex Integrated Care Board have commented on the application and advised that the development would give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development. It is advised that a developer contribution (£380,200) will be required prior to development commencing to mitigate the impact.
- 5.70 An appropriate contribution can be secured via S106 obligation (subject to adjustments to take account of East Suffolk's CIL Charging regime) and would therefore align with the expectations of policy ISPA4 in terms of a financial contribution being made to off-site healthcare facilities.

Impact on Neighbouring Residents

- 5.71 Local Plan Policy DM18 states that the Council will protect the quality of life of occupiers and neighbours by only granted permission for development that does not result in an unacceptable loss of amenity.
- 5.72 A number of objections have been received from local residents in response to the application. Loss of amenity to residents is a key consideration when assessing the acceptability of the development. The principle of developing the site for housing has been accepted as appropriate via the Local Plan and the purpose of this application is to assess in more detail the appropriate form and nature that this comes forward.
- 5.73 There are residents located around the majority of the site. The numbers however vary greatly between those adjoining the site on the Ipswich boundary and those along the more rural edges to the north and west.
- 5.74 The visual appearance of the development and intensity of the activity along Humber Doucy Lane will have an impact on this part road. It is noted that existing dwellings along Humber Doucy Lane which face the application site vary between single storey and two storey homes. An appropriate set back of the development from the road is considered necessary not only to preserve

the appearance of Humber Doucy Lane but also ensure residential amenity is protected.

- 5.75 Particular attention is paid to the vehicular access proposed along Humber Doucy Lane and the impacts this will have on residents. The access junction opposite Inverness Road will introduce an increase of traffic movements in this location, together with the presence of traffic lights and the end of Humber Doucy Lane which features smaller houses and a more rural feel.
- 5.76 Amenity impacts from the construction activity which would follow if permission was granted for the development could be safeguarded via an appropriate planning condition to secure a Construction and Environment Management Plan.
- 5.77 In conclusion it is considered that the general amenity of existing residents can be safeguarded via appropriate set backs of development from boundaries and scale of development. There is a significant concern with the impact of the signalised junction with Inverness Road and the impact this would have on this part of Humber Doucy Lane and its residents. Further information to justify this location in place of other alternatives is needed together with Transport information to demonstrate the junction is acceptable from highway safety perspective.

Residential Quality including Noise and Vibration

- 5.78 Local Plan Policy DM18 states that the Council will protect the quality of life of occupiers and neighbours by only granted permission for development that does not result in an unacceptable loss of amenity. Exceptions will only be made where satisfactory mitigation measures can be secured. The factors which will be considered include:-
- overbearing impact and sense of enclosure;
 - sunlight, daylight, overshadowing and artificial light levels;
 - noise and vibration levels;
 - odour, fumes, dust and ventilation;
 - contamination; and
 - visual privacy and overlooking.
- 5.79 Given the design, layout and scale of the housing are subject to a further reserved matters application, many of these aspects would be subject to further scrutiny once Outline permission is granted and more details are submitted for assessment.
- 5.80 For the purposes of this application, an assessment needs to be made as to whether any aspects of the proposals including parameter plans highlight potential issues for future residents in terms of their amenity.
- 5.81 Conditions can be applied to any Outline Permission to secure residential amenity in close proximity to non-residential uses such as opening / delivery hours; as well as ventilation details which can be the source of noise concerns

for nearby residents. In addition, given the size of the development residential amenity of future residents during the construction phase can be secured by a Construction Management Plan – also to be secured by planning condition.

- 5.82 IBC Environmental Protection team have advised that the submitted Noise Impact Assessment (NIA) is satisfactory. It is noted that the NIA requires further input for acoustic glazing and ventilation once the final details are known. Thus, a condition should be applied requiring the submission of glazing and ventilation details prior to full planning permission being granted. The glazing and ventilation should allow habitable rooms to meet the standards set out in our guidance note, and this is particularly important for the proposed dwellings closest to Ipswich Rugby Club with regards to amplified music.
- 5.83 East Suffolk Environmental Protection Team have noted the close proximity of the railway line and potential impact of increased rail movement especially through the night in connection with the Sizewell C project. There is a buffer proposed between housing and railway line and as set out above more detailed consideration can be given to appropriate design at the reserved matters stage.
- 5.84 Environmental Protection also note that heat pump technology is proposed rather than gas boilers. However, care needs to be taken over the siting of any Air Source Heat Pumps as they can give rise to noise complaints if not located and installed correctly. Ground Source Heat Pumps do not pose noise issues for neighbours and as this is a greenfield site it is noted that these would be more suitable.
- 5.85 'Contamination' is dealt with under a separate section of the assessment. Subject to appropriately worded conditions it is considered that residential amenity within the site can be appropriately secured within the proposals, in accordance with Local Plan Policy DM18.
- 5.86 Subject to appropriate conditions requiring further details at the relevant design stages to secure residential amenity and further consideration of scale, layout and design of houses at reserved matters stage it is considered a suitable level of amenity for future residents can be secured on site in accordance with Local Plan Policy DM18.

Transport and Parking

- 5.87 Policy DM21 states that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall (amongst other things), not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety; promote pedestrian and cycle accessibility to and permeability within the site; and have safe and convenient access to public transport within 400 metres. It also requires an application to demonstrate how any adverse transport impacts would be acceptably managed and mitigated to contribute to achieving the modal shift target.
- 5.88 Local Plan Policy DM22 'Car and Cycle Parking in New Development' sets out the Council's requirements with regards to car and cycle parking standards within

new developments.

5.89 A Transport Assessment (TA) and Framework Travel Plan have been submitted in support of the application.

5.90 The TA describes the existing road network, including its quality and width, where speed limits and street lighting are in operation, locations of bus stops and types of pedestrian paths and crossings in place. It is noted that the existing site offers moderate accessibility for pedestrians, this is based on Humber Doucy Lane which bounds the site on the west side to a large extent and benefits from ample street lighting, is subject to a 30mph speed limit and an unbroken pedestrian footway along the southern edge. The footway is to a large extent segregated from the road via grass verges, vegetation and trees, further improving pedestrian safety. There is no segregated pedestrian infrastructure from Tuddenham Road to Humber Doucy Lane on the north boundary of the application site.

5.91 With regards to cycling accessibility, this has been categorised to be of a moderate standard within the TA. It is noted that there is no dedicated cycle infrastructure in the vicinity of the site. Identified as positive to cycle accessibility is the street lighting and adequate residential parking which limits on street parking therefore reducing potential road hazards. The nearest accessible urban cycling infrastructure is situated on Colchester Road / A1214 to the southwest of the development site.

5.92 The TA concludes that the application site is moderately accessible by public transport with a total of 4 bus stops along Humber Doucy Lane which are noted as impractical as they do not benefit from shelters or pull-in lanes. Nearby roads which are within walking distance of the application site have slightly better accessibility to public transport with additional bus stops on Sidegate Lane, Inverness Road and Renfrew Road. In addition the closest railway station at Westerfield is approximately 2 miles northwest of Humber Doucy Lane, however more accessible stations by sustainable means are Ipswich Railway station and Derby Road railway station.

5.93 Accident analysis has been provided as part of the assessment and identifies that a total of 8 accidents occurred within a 250m radius of the application site, between the year 2018 and 2022. Of these eight accidents – one was categorised as ‘serious’ and seven were categorised as ‘slight’, none were categorised as ‘fatal’.

5.94 The access proposals for the site consist of the following:-

Pedestrians:

Access for pedestrians is proposed from four locations on Humber Doucy Lane. From west to east, the accesses comprise the following:-

- Controlled crossing facilities incorporated into the proposed signalised access junction, connecting the proposed segregated cycle /footways within the larger parcel to existing footways on Inverness Road and Humber Doucy Lane.

- A new segregated pedestrian and cycle path running the entire length of the main site parcel frontage from the main site access to Sidegate Lane. This new path will be located behind the existing mature hedgerow;
- A tiger crossing located to the west of Sidegate Lane, connecting the proposed segregated cycle / footways within the main site parcel to the existing shared footpath/cycle way on Humber Doucy Lane and the wider network accessible in the vicinity of the site;
- A controlled crossing connecting the existing shared footpath / cycle way on Humber Doucy lane to the proposed segregated cycle / footways within the smaller parcel to the east; and
- Pedestrians will also be able to access the smaller parcel to the east via new footpaths provided in the design of the proposed vehicular access to this parcel of land that connect to the internal footpaths.

Cyclists:

Similar to access for pedestrians, access for cyclists is proposed from the same four locations on Humber Doucy Lane.

General Vehicular Traffic:

In terms of general vehicular traffic site access, three accesses are proposed. from west to east, the proposed access are as follows:

- Priority controlled T-junction onto Tuddenham Road serving only the northern-most development parcel;
- Signalised junction on Humber Doucy and into the main larger development parcel;
- Priority controlled T-junction onto Humber Doucy Lane into the eastern parcel.

Buses:

Bus access is proposed to be facilitated via the new proposed signalised site access junction onto Humber Doucy lane in the main larger development parcel or via a new bus gate which is proposed and located opposite the junction of Sidegate Lane on Humber Doucy Lane. At this stage it is not known which buses which already serve nearby roads and areas will be extended / diverted to take in this site but a strategy has been considered in consultation with SCC to enable a bus route through the site.

Emergency access:

Additional access for emergency vehicles to the main larger development parcel is provided via the proposed bus gate.

5.95 Internal site layout, car & cycle parking, servicing and refuse collection and development construction are not addressed in detail within the proposals but are identified as requirements which are intended to be met within the detailed design of the development.

5.96 Traffic impact of the development was considered as part of the TA. Trip generation data was calculated for am and pm peak times. Traffic surveys were conducted and the assessment years (2026 and 2032) and periods incorporated wider development which is proposed or currently being constructed.

This included:-

- Red House Park – IP/22/00013/OUTFL – part of the Ipswich Garden Suburb (IGS): 1,020 dwellings and associated community facilities;
- Fonnereau Village - IP/14/00638/OUTFL – part of the IGS: 815 dwellings, a new primary school, a district centre, green spaces and a new community centre;
- Adastral Park – DC/17/1435/OUT – up to 2000 dwellings, employment area, primary local centre, secondary centre, school, green infrastructure, outdoor play areas, sports ground and associated infrastructure;
- Henley Gate – IP/16/00608/OUT – part of the IGS: 1100 dwellings, new primary school, local centre, 30 ha country park and visitor centre; and
- Westerfield Care Village – DC/17/05571 – expansion to extant Westerfield House residential care home.

5.97 TA assumes 49 dwellings are proposed within the small parcel off Tuddenham Road and 68 dwellings within the small eastern parcel. Main parcel 543 dwellings assumed. Junction impacts considered for three new access points and existing off-site junctions, which included:-

- Junction 1 - Tuddenham Road / Humber Doucy Lane - Priority Junction,
- Junction 3 - Sidegate Lane / Humber Doucy Lane - Priority Junction,
- Junction 4 - Roxburgh Road / Humber Doucy Lane / Seven Cottages Lane - Priority Junction,
- Junction 5 - Dumbarton Road / Humber Doucy Lane - Priority Junction,
- Junction 6 - Rushmere Road / Humber Doucy Lane / The Street - Mini-roundabout,
- Junction 11 - Rushmere Road / A1214 – Roundabout,
- Junction 12 - Tuddenham Road / A1214 Colchester Road / Valley Road – Roundabout,

5.98 In conclusion the TA found from the junction capacity assessments that in the assessment scenario year of 2032 with predicted background growth, committed development generated traffic and predicted traffic generated by the completed Proposed development, Junctions 1, 3, 4, 5, 6 and 11 will continue to operate within capacity. Furthermore it is noted that these all operate within capacity with significant reserve capacity.

5.99 Detailed analysis of Junction 12 (Tuddenham Road / A1214 Colchester Road / Valley Road – Roundabout) concludes that it currently operates with several approaches exceeding their practical capacity. The application of predicted traffic growth and committed development concludes that those impacts will increase significantly with approaches exceeding their operational capacity without mitigation. This situation is only exacerbated further with the addition of the predicted traffic generation from the proposed development and therefore improvements are found to be required to the junction in future even without the proposed development.

5.100 A Framework Travel Plan has been submitted in support of the application which proposed a range of travel plan measures including:-

- Travel Plan Coordinator
- High speed Broadband connection
- Travel Information packs with bike vouchers and / or public transport season ticket, information of sustainable transport and car sharing promotion, personalised travel planning.
- Design and layout of the development to maximise permeability of the site for sustainable transport rather than for the private car.
- Special events to further promote sustainable travel.

5.101 The proposed Heads of Terms includes a proposed obligation to secure the Travel Plan. The Framework Travel Plan submitted proposes the developers of the site commit to fully fund the preparation and implementation of the Residential Travel Plan; the developers will appoint a Travel Plan Coordinator no later than 60 working days before dwelling occupation and will remain appointed until at least three years after the full occupation of the development; and the developers will meet SCC's reasonable costs as incurred in monitoring the Residential Travel Plan.

5.102 SCC Highways have objected to the scheme on a number of grounds. These relate to the assumptions used within the TA as well as the conclusions reached with regards to mitigation. Of particular concern is the Trip generation information being utilised and key destinations assumed. There are concerns with the assessment information used to design the Humber Doucy Lane junction opposite Inverness Road and an in-principle concern with the main access to the development being located in this part of Humber Doucy Lane. A preference is noted for this being opposite Sidegate Lane to provide more direct accessibility to the A1214 corridor and reduce convenience of future motorists using less suitable roads such as Inverness Road, Tuddenham Road and Church Lane.

5.103 Both Network Rail and Highways England have identified further assessment work which needs to be undertaken in relation to their respective interests – Railway infrastructure and Strategic Road networks.

5.104 SCC Highways have also highlighted the need for proposals in relation to cycle / walking connectivity between development parcels to be improved as well as those off-site. SCC PRoW have also commented on the impact of the development on existing PRoW in the site and ensuring better connections are made.

5.105 Active Travel England have raised concern about trip generation and assignment, access to public transport, pedestrian and cycle accessibility, the lack of an active travel route audit and critically off-site transport infrastructure and access arrangements and travel planning. In summary Active Travel England have advised that the submitted information does not demonstrate that the design of the development, proposed active travel infrastructure and travel plan will create an environment that supports and embeds active travel in line with government's aims for 50% of all journeys in towns and cities to be made by walking, wheeling and cycling. On that basis ATE considers that the application as submitted does not demonstrate 'appropriate opportunities to promote

sustainable transport modes can be – or have been – taken up’ in accordance with paragraphs 116 and 114a of the NPPF, or that ‘safe and suitable access to the site can be achieved for all users in accordance with paragraph 114b of the NPPF.

- 5.106 Two additional access points will serve the parcels E and D in the north and the south-east of the site. There will be no vehicular connectivity between the roads serving these parcels and the spine road. In the north, access will be provided from Tuddenham Road. The south-eastern parcels will be served by the junction at the bend in Humber Doucy Lane. A walking and cycling route from the site using Sidegate Lane has been proposed. This will link the site to the nearest primary (Rushmere Hall) and secondary (Northgate High) schools and the Colchester Road/Sidegate Lane Local Centre. Onward connections to the Town Centre could be made using Cemetery Lane, Belvedere Road and Tuddenham Road. However, there are not any walking and cycling routes identified for other key destinations in east Ipswich, such as Ipswich Hospital, St Albans Catholic High School and the Woodbridge Road East District Centre. Furthermore, cycling links to key employment areas outside the Borough’s administrative boundary like Adastral Park in East Suffolk have not been considered in both the Transport Assessment and Travel Plan.
- 5.107 There has been some limited reference to the bus services that currently serve Humber Doucy Lane and Sidegate Lane, but no reference to the outcomes of any discussions with the local bus operators and the Suffolk County Council Passenger Transport Team to confirm if a re-routing of the existing services, or new service to the site would be commercially viable. Evidence of these discussions and outcomes would be needed to demonstrate policy compliance.
- 5.108 Junctions such as Woodbridge Road/Heath Road/Colchester Road that have been identified in Table 21 of the ISPA Transport Mitigation Strategy have not been assessed in the Transport Assessment. If the development has any negative impact on the junctions capacity, further mitigation measures will be needed to address this. Also, improvements for the walking and cycling infrastructure may be needed to address some of the issues/gaps in infrastructure identified in the Ipswich Cycling Strategy SPD and East Suffolk Council’s Local Cycling and Walking Infrastructure Plan (LCWIP).
- 5.109 A Travel Plan has been submitted to identify some of the Smarter Choices measures that will be delivered. Further consultation will be needed with Suffolk County Council to determine the need for certain measures like the provision of travel information, multi-modal vouchers, and sustainable transport event days, as the phrase “may” has been used which may cause some uncertainty if these measures will be delivered at a later stage.
- 5.110 The Transport Assessment makes a reference to the provision of electric vehicle charging points in accordance with the 2023 Suffolk Guidance for Parking. This provision will need to be secured through a suitably worded planning condition to ensure policy compliance.

- 5.111 Neither the Transport Assessment or Travel Plan refer to either the investigation or provision of an on-site car club. This car club could be part of an on-site Mobility Hub that includes other forms of shared mobility and other services that reduce the need to own a private car. Mobility Hubs have been identified by the RTPi (<https://www.rtpi.org.uk/media/9233/rtpi-net-zero-transport-january-2021.pdf>) as a good place-based solution to reduce carbon emissions in transport, which could be incorporated into this development. The applicant will need to investigate the provision of an on-site car club (and a mobility hub) and provide evidence of where it will be located to comply with this policy requirement.
- 5.112 Both the Transport Assessment and Travel Plan makes reference to active modes of travel taking priority within the development; however it does not fully consider how effective this active travel infrastructure will be when it connects to the existing active travel infrastructure and if it will achieve any modal shift.
- 5.113 The Transport Assessment refers to some of the existing Public Rights of Way (PRoW) that are within the vicinity of the development, however there is no reference to any opportunities to enhance the existing rights of way. There also needs to be a commitment for the development to contribute to the Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy. This will require consultation with SCC (as Highway Authority) to determine the level of mitigation and contribution to the ISPA Transport Mitigation Strategy.
- 5.114 Section 5.3.3 of the Transport Assessment refers to the car parking provision to be delivered in accordance with the 2023 Suffolk Guidance for Parking which would meet the policy requirement. However, there is a caveat to mention that it will be determined at the reserved matters stage but also mentions that “the scheme will be designed based on the requirement for reducing off-site impacts of the development”. This could suggest that there may be reduced car parking provision, which will require robust sustainable transport and Travel Plan measures to avoid overspill car parking both on and off site.
- 5.115 With the cycle parking section 5.3.4 refers to the cycle parking provision being delivered in accordance with the 2023 Suffolk Guidance for Parking which would meet the policy requirement. The 15% modal shift target towards sustainable modes of travel identified in this policy has not been identified in either the Travel Plan or Transport Assessment. This will need to be addressed in consultation with Suffolk County Council (as Highway Authority) to demonstrate policy compliance with Policy CS5. The measures identified in both the Transport Assessment and Travel Plan have identified some compliance with the relevant proposals linked to the policy, however more information will be needed to demonstrate full compliance. For example, there could be more information on the measures to encourage a greater uptake in bus use (e.g. vouchers, onsite marketing campaigns) and expanding further on some of the Travel Plan measures (e.g. free cycle maintenance sessions for residents, adult cycle training, etc).
- 5.116 As mentioned with the review of ISPA4 there should be some further work undertaken to identify the desired walking and cycling routes to key destinations

to determine if further active travel infrastructure improvements are needed on these routes. In undertaking this exercise there may be some further off-site improvements that can be made to further encourage the residents to travel by active modes to key destinations. On reviewing the proposed mitigation in section 9 of the AQA, the budget of the Travel Plan (£37,000) is unlikely to be sufficient to cover the cost of implementing its measures, such as the cost of appointing a Travel Plan Coordinator, providing promotional material and events and multi-modal vouchers for the residents of up to 660 dwellings, where the duration of implementing and monitoring the Travel Plan is likely to be at least over several years.

5.117 It is noted that East Suffolk Council's adopted Cycling and Walking Strategy, although not an IBC strategy, includes recommendations which reach into the Borough. A number of recommendations are expected to be provided in relation to this site allocation and include :

- Introduce a segregated cycling and walking track along Humber Doucy Lane, segregated from the road by existing vegetation. This segregated track should run all the way along Humber Doucy Lane and across the area of land between Playford Road and Woodbridge Road, becoming an on road facility in the form of a Cycle Street between the Humber Doucy Sports Centre vehicle access and Playford Road. Introduce cycling and walking crossing points at appropriate intervals along Humber Doucy Lane.
- Introduce a shared cycle/footway along Sidegate Lane.
- Introduce a cycling and walking connection onto Tuddenham Lane and Bridleway 1. Widen and resurface Bridleways 1, 15, and 2 to accommodate cyclists and pedestrians.

5.118 In conclusion, it is evident that there are deficiencies and concerns with the assumptions and information used within the TA submitted. As a result the outcomes concluded from that assessment cannot be considered robust enough to rely upon in informing the assessment of the proposals. Notwithstanding the concerns with the TA, there are also some fundamental issues with certain aspects of the access proposals and mitigation proposed which are not considered to support a development which could be considered as managing adverse transport impacts arising, promoting pedestrian and cycle accessibility to and permeability within the site, together with contributing to achieving a modal shift target. These concerns relate to but not limited to, the proposed Travel Plan; the location of the Humber Doucy Lane access opposite Inverness Road; lack of an off-site cycle & pedestrian strategy; connectivity and permeability of pedestrian & cycle routes through the site. The proposed development is therefore considered contrary to Local Plan Policies ISPA4, DM21 and DM22.

Flooding and Surface Water Drainage

5.119 Policy DM4 states that new development will only be approved provided it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and appropriate application of SuDS, it will be adequately protected from the risk of flooding, remain safe for the lifetime of the development, and include rainwater efficiency measures.

- 5.120 The site is within Flood Zone 1 , however, surface water should only be served through sewer in very exceptional circumstances. The inclusion of SuDS to manage surface water disposal is supported. The CIRIA guidance (susdrain.org) provides useful information about integrating SUDs and biodiversity. The maintenance of SuDS should be provided for the lifetime of the project. The site is located in a Source Protection Zone and treatment of surface water for pollutants prior to disposal is vital. This may require larger areas to be dedicated for SuDS than standard.
- 5.121 The Lead Local Flood Authority (LLFA) have responded to the application with a holding objection because the flood risk assessment and drainage strategy have not fully considered the existing watercourse network around the site and therefore presents a risk of the development having an adverse impact on it and a resultant increase in flood risk on neighbouring sites.
- 5.122 The drainage strategy relies on deep infiltration structures which are considered a last resort by SCC LLFA, it is therefore recommended that a discharge to the watercourse network is fully considered as this is more sustainable than deep infiltration. It is also required that more SuDS are incorporated into the parcels, swales along the main access roads and open/above ground conveyance of surface water from the parcels into the strategic basins. A full list of points and other more technical details are included in the consultee response together with an offer of working with the applicant to overcome the objection.
- 5.123 The Flood Risk Assessment submitted is deficient in a number of aspects and it cannot be concluded that the proposals comply with the requirements of DM4 and adequately demonstrate that the new development would not increase off-site flood risk. In addition the proposed drainage strategy is not considered to follow the advice set out within the Suffolk SuDs Guide, Suffolk Design for Streets Guide to ensure a drainage strategy which provides adequate protection from flooding and is safe for the lifetime of the development as set out in Local Plan Policy DM4.

Energy and Sustainability

- 5.124 Local Plan policy DM1 sets out the requirement for residential development to meet a high standard of environmental sustainability and policy DM2 sets out the requirement for all new build development of more than 10 dwellings to provide at least 15% of their energy requirements from decentralised and renewable or low carbon sources.
- 5.125 An Energy and Sustainability Statement has been submitted in support of the application. The statement concludes that the development will comply with the 2021 Building Regulations which will ensure that the development exceeds the IBC Local Plan policy target of 19% CO2 savings.
- 5.126 With regards renewable energy targets of 15% (IBC) and 20% (ESC) these are intended to be met via a combination of heat pumps and solar PV.

- 5.127 The incorporation and consideration of other sustainability measures in relation to transport, biodiversity, drainage and green infrastructure are considered in the relevant sections of this assessment. Aspects of sustainability connected to construction, waste and water efficiency, together with the specific renewable targets set out in policy DM2 can be secured via appropriate conditions or at the next stage of details.

Landscape and Visual Impact

- 5.128 Local Plan Policy ISPA4 includes specific criteria which the development of this site is expected to comply with, this includes point b) which states:-

Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk;

- 5.129 More generally the Local Plan within policy DM12, advises that proposals should also respect and promote the special character and local distinctiveness of Ipswich by protecting and enhancing significant views that are considered important or worthy of protection, in addition design is expected to help reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene.

- 5.130 The site is adjacent to the valley and tributaries of the River Fynn are designated as a Special Landscape Area in the Suffolk Coastal Local Plan. This is in recognition of its special landscape attributes, which are particularly vulnerable to change. As the Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich notes, the area comprises 'the plateau farmland between the existing urban edge of Ipswich and the Fynn valley to the north'. The land, although elevated, is relatively flat and enclosed by mature hedgerows. In terms of the impact of development on the surrounding landscape and the rural setting of nearby villages, the site is separated by open fields from Rushmere St Andrew to the east, and from Westerfield and Tuddenham to the west and north.

- 5.131 Maintaining that separation is important to preserving the rural setting of these villages as set out in the Local Policy ISPA4. The Heritage Impact Assets has identified the importance of existing landscape and views to the setting and significance of the heritage assets. Assessing the impact of the development on the wider landscape is challenging without a definitive site plan. An indicative Green Trail route has been identified on page 25 of the Design and Access Statement to comply with part ii.

- 5.132 From the Ipswich Borough side of the development there are a number of concerns. The contextual analysis in the DAS reflects a focus on the rural and listed building setting of the site. There is less of an emphasis on the existing semi-rural setting of Humber Doucy Lane, a point of concern as this is the part of the site most likely to be impacted by the housing development.

- 5.133 Although the parameter plans contain some welcome recommendations for the Humber Doucy Lane frontage, such as the retention where possible of the existing hedgerow, there is a lack of consistency and coherence in the treatment of this edge, showing what will replace the existing (highly valued) 'rural lane' character. The green space, access and housing block plans imply multiple features: a footway / cycleway, retained hedge, access road and housing frontages.
- 5.134 The proposal to locate a principle HDL road junction opposite Inverness Rd is likely to have a harmful effect on the special character of this part of Ipswich's residential landscape. The DAS is slightly dismissive in its reference to the Tarran bungalows as a 'relic' of early postwar planning. Although there is some accident in their survival, their density and scale have proved resilient over years and popular with residents, particularly older people who appreciate the quiet and convenience of the location. Inverness Rd, currently a quiet side street with its original concrete surface (contemporary with the bungalows) still in situ is likely to become a heavily trafficked shortcut in this proposal, an unacceptable imposition on a valued suburban streetscape.
- 5.135 The north-eastern edge of the development area is recognised as a character area which is welcomed. Special edge conditions do apply here, as this is where the development meets the countryside and where the newly extended town of Ipswich will now meet its rural hinterland. This edge is of heightened importance, thereby, and merits special attention and design effort. Also of considerable note here is that the north-eastern edge brings the development into proximity with designated heritage assets at Allens House and Laceys Farmhouse. It is there considered appropriate that there is a greater offset along the north-eastern edge to provide an increased and improved transition from urban edge to the open countryside, taking in the setting of the close-by heritage assets.
- 5.136 In conclusion there are a number of concerns with the particular arrangement and features of the proposals and their impacts on the wider landscape and character of the surrounding area. The proposed highway junction is considered to negatively impact on this part of the Humber Doucy Lane and alternative options should be explored. The offset along the north-eastern edge of the development is considered insufficient in creating the necessary transition space and separation between the new development and countryside beyond. The proposals are therefore considered to be contrary to Local Plan policies IPSA4 and DM12.

Heritage Assets

- 5.137 Policy DM13 (Built Heritage and Conservation) states that proposals for new development must among other considerations, consider the impacts on the historic built environment which makes Ipswich such a distinctive town. Specific to this site policy IPSA4 identifies that ***The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced***

as part of any future development of the site. Development must also have regard to its impact on the significance of non-designated heritage assets identified in the Heritage Impact Assessment (HIA) (September 2020). It is noted in the policy that a HIA will be required as part of any application demonstrating how the effects on heritage assets are taken into account and mitigated.

- 5.138 A Heritage Impact Assessment has been submitted in support of the application. However, this is barely adequate for the purposes of paragraph 200 of the NPPF and needs to be substantially improved. The references to the NPPF within the document are out-of-date. Furthermore, although most of the heritage assets are located in East Suffolk, there is a lack of reference to the East Suffolk local plan, policies and guidance. The 'Analysis of Proposals and Impact' chapter appears only to consider Westerfield House and IBC's policies; there appears to be discuss the heritage assets within East Suffolk or consideration to East Suffolk policies in this chapter. This therefore leads to some confusion about the basis for the authors conclusion on page 18. Further information would need to be provided at reserved matters stage, to demonstrate how the design and details impact the heritage assets, and this should also address the deficiencies in the current HIA.
- 5.139 As noted in policy IPSA4, there are a number of designated heritage assets adjacent to the boundaries of the site. They comprise the Grade II listed Westerfield House, fronting HDL on land between two of the site parcels; and Grade II listed Allen's House, Lacey's Farm and the Garden Store north of Villa Farm, to the east of the site boundary. All currently lie within a surrounding setting of open farmland, and therefore the development of the application site could affect their significance.
- 5.140 The application site is also within the vicinity of the Water Tower, Seven Cottages and Villa Farmhouse, all of which are identified as non-designated heritage assets. These have been included within the applicant's Heritage Impact Assessment.
- 5.141 The land to the immediate south and east of Westerfield House is excluded from the site boundary, as it is the subject of a separate permission for a care village, which would separate any development on the application site from the listed building. Mature trees, hedges and farm buildings also provide a degree of screening for Allen's House and Lacey's Farm along the eastern boundary of the site.
- 5.142 It is worth noting that IBC submitted a Heritage Impact Assessment (HIA) for the site, along with a SoCG with Historic England, which identified a number of mitigation measures, including a reduction in site capacity from 496 to 449 dwellings to allow a buffer of space and/or landscaping at the site boundaries closest to these heritage assets. The Council incorporated these changes into Policy ISPA4 and the supporting text, which are necessary to ensure effectiveness and consistency with national policy in requiring future applications to have regard to the impact of development on the settings and significance of these assets.

- 5.143 The proposals show boundary planting alongside the boundary with the Westerfield House site. The grade II listed building is set on the west side of its own site, towards Humber Doucy lane, and permissions exist for the creation of a Care Village within the extensive grounds on the east and south, towards the proposed housing site. The Village will have its own well landscaped setting and it is important that the tree and shrub boundary planting along the housing site edge is continuous and complements the landscaped care environment. This should be possible with the scale of screen edge planting shown in the proposal drawings.
- 5.144 The outbuilding at Villa Farmhouse is a grade II listed building which was likely the earlier of the two farmhouses at this site, forming part of the historic Villa Farmstead, which is recorded on the Suffolk County Council Historic Environment Record. The list description suggests that the survival of this building is probably due to its early replacement by a larger house to which it then became an 'outbuilding, perhaps a bakehouse or brewhouse'. This building, therefore, has been an ancillary building within the wider farmstead for a considerable period of time, and draws its significance from that functional and integral association with other farmstead buildings, rather than the wider farmed landscape. On this basis, it is considered that the application site does not contribute to the significance of the outbuilding at Villa Farmhouse.
- 5.145 Laceys Farmhouse and Allens House are Grade II listed buildings situated to the north west of the main plot in the application site. Laceys Farmhouse is early-16th century in origin and was part of the historic Laceys Farmstead. Allens House is mid-16th century in origin and was part of the historic Allens farmstead. Both farmhouses and their farmsteads likely had a functional and tenurial relationship with the surrounding farmed landscape, although any such direct association has now ceased.
- 5.146 The impacts of the proposals on Laceys Farmhouse and Allens House and the effects arising have been assessed by East Suffolk Councils Principal Heritage and Conservation Officer. There will be no direct impacts arising from the application proposal on the significance of the two listed buildings. However, there will be indirect impacts arising from development within the setting of Allens House and Laceys Farmhouse, and these impacts include:
- Some loss of their historically open and undeveloped surroundings
 - Some loss of the agricultural use of surrounding land which is an established and historical use
 - Some loss of associated tranquillity and the intermittent sounds of seasonal agricultural land use
 - Encroachment of built form, activity and urban character, and loss of the physical separation between the town and the heritage assets.
- 5.147 The principal effect arising from these impacts is a reduced ability to appreciate the relationship between the historic farmsteads and their historic and integral association with the surrounding farmed landscape. However, the farmsteads

are no longer in use as farmsteads, there is limited intervisibility between them and the application site, the surroundings are already semi-rural in character, and open countryside remains to the north of these heritage assets. The effects will give rise to harm to the significance of the two affected designated heritage assets. As the application site contributes moderately to the significance of the heritage assets, a low level of less than substantial harm has been identified. Therefore the relevant test in paragraph 208 of the NPPF must be engaged, which requires the decision maker to weigh up the harm identified to each designated heritage asset with the public benefits of the proposed development, bearing in mind paragraph 205 that states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, regardless of the level of harm identified.

5.148 The north-eastern edge brings the development into proximity with designated heritage assets at Allens House and Laceys Farmhouse. The buffer there is important to help protect the heritage assets along the northern boundary. There should be a greater offset along the north-eastern edge to provide an increased and improved transition from urban edge to the open countryside, taking in the setting of the close-by heritage assets. This would help to achieve appropriate mitigation.

5.149 In conclusion, it is considered that the buffer along the north-eastern edge of the development needs to be improved in order to appropriately mitigate the development with regards to its impact on identified heritage assets and ensuring the impact of the proposed development on neighbouring heritage assets remains as less than substantial harm in accordance with the NPPF (paragraphs 135 and 139) and local plan policy DM13.

Trees and Hedgerows

5.150 Policy DM9 of the Local Plan seeks to protect existing trees and seek to secure additional trees that increase canopy cover in the interests of amenity and biodiversity.

5.151 An Arboricultural Impact Assessment report has been submitted in support of the application. There is concern that this includes paragraph 4.4.1 which states "the location of the access road and allied linkages is indicative and therefore specific construction details where there may be conflict with RPA of retained trees are yet to be determined". The assessment has been based on the Parameter plans although the access details have been submitted in full detail so these should be considered in the assessment so the full extent of works and potential impacts can be understood.

5.152 It is noted that the majority of the existing boundary vegetation will be retained at the site and include most of the existing hedgerow along Humber Doucy Lane which is a particularly important feature. However a large section will need to be removed to facilitate / install the new vehicle, pedestrian & cycle accesses. Where this occurs it's very important to mitigate this loss with significant tree & hedge planting at these junctions in order to maintain and enhance the green

connectivity of the whole site. This is particularly relevant where portions of high visual amenity hedge features (identified on tree survey as H006 & H017) are to be removed.

- 5.153 There are two existing TPO's in place at Westerfield House on Humber Doucy Lane - TPO No 3/2015 and TPO No 6/2019, which are important landscape features on the boundaries of the smallest & largest parcels of development land. In addition the submitted tree survey has identified an ancient Oak tree T056 within the smallest parcel of proposed development land on the junction of Tuddenham Rd & Humber Doucy Lane and several Cat A Veteran English Oak trees to the Northern end of the largest parcel of development land. These are all noted as very important features to the landscape and appropriate safeguards are required to ensure retention.
- 5.154 Internal advice for both Council's suggest that further consideration needs to be given to the proposed internal planting scheme which needs to be considered early in the process to ensure they are carefully co-ordinated at an early stage, with other aspects of highway design, with sight line requirements, lighting schemes, CCTV, underground & overhead service routes and avoidance of physical obstruction or damage should all be taken into account, with due consideration for future growth and periodic maintenance requirements.
- 5.155 The removal and impact of hedgerow along Humber Doucy Lane and the full extent of impact on trees in this location needs further consideration with an updated AIA with construction details incorporated, together with suitable replacement planting proposed. Subject to appropriate safeguards being in place and detailed landscaping proposals being secured at a more detailed stage the scheme with regards to Trees and Hedgerows could be considered acceptable but there remains an outstanding concern in relation to the loss of the hedgerow along Humber Doucy Lane and the impact on the character of this part of the site.

Ecology and Biodiversity Net Gain

- 5.156 Policy DM8 requires all development to incorporate measures to provide net gains for biodiversity. The Council will seek to conserve and enhance local biodiversity in accordance with the National Planning Policy Framework and national legislation by requiring (among other measures) requiring new development to incorporate provision for conserving and enhancing local biodiversity. Biodiversity Net Gains is a statutory requirement set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990.
- 5.157 A wildlife audit of this site was undertaken in 2019 to inform the preparation of the Local Plan. Within the Audit the site is broken down into a number of areas with detailed information on the habitat types, protected habitats and species present, detail is also provided about the sites connectivity and structural diversity. Comments and recommendations are made about each. The Wildlife Audit identifies that there are ancient species rich hedgerows on the site which are likely to be protected under the Hedgerow Regulations 1997.

- 5.158 Current proposals show seven hedgerows will have sections removed, to ensure connecting dark corridors are retained for important bat species, notably barbastelle, the mitigation hierarchy should be followed and wherever possible hedgerows used by barbastelle should be retained. Where this is not possible sections removed should be kept to a minimum and careful design used to retain connectivity; such design should consider; lighting type, temperature, lumen, and lux levels; and use of “hop-overs” or similar to create near continuous connectivity of vegetation where hedgerows are severed.
- 5.159 The submitted EclA states that there will be no impacts to County Wildlife Sites. However the circular route proposed includes a section adjacent to the Pumping Station Meadow CWS which has no public access. This could impinge negatively on the CWS through increased recreational pressure.
- 5.160 The proposals include a total of 330 Bird and Bat Boxes, however “the Royal Institute of British Architects (RIBA) in their book Designing for Biodiversity (2nd Edition) recommends, “as a guideline, the number of built-in provisions of nest or roost sites per development should be approximately the same as the number of residential units”.
- 5.161 Ecological advice from has been sought to review and advise the LPA on the ecological information submitted and impacts of the development. As part of this review the submitted ecological documents have been considered (Preliminary Ecological Appraisal (CSA Environmental, March 2024), Ecological Impact Assessment (CSA Environmental, March 2024), Information to inform Habitats Regulations Assessment (CSA Environmental, February 2024), Biodiversity Net Gain Assessment: Design stage ((CSA Environmental, March 2024), Illustrative Landscape Strategy (CSA Environmental, February 2024), Arboricultural Impact Assessment (Hayden’s, Feb 2024) and Parameter Plan: Green & Blue Infrastructure Rev P02 (PRP, February 2024)), these documents have been supplied in relation to the likely impact of the development on designated sites, protected & Priority habitats and species and identification of proportionate mitigation.
- 5.162 The review highlighted that in respect of protected species the EclA states that further survey work in regard to bat, dormouse and great crested newt are to be carried out in spring/summer 2024, the results of which shall be used to provide an updated EclA. This information is required in order for the LPA to have more certainty on the likely impacts on legally protected species and secure appropriate mitigation. It is also noted that further investigation is needed in respect of an Ancient/veteran tree which has been identified in the EclA and could be a potential irreplaceable habitat. The EclA also notes that further breeding bird surveys are scheduled for March-June 2024 and the results would be provided in a updated EclA report, this information is required in order to inform the mitigation and compensatory measures including offsite provision for ground nesting farmland birds needed to support the proposed development.
- 5.163 The ESC Ecology Officer has noted that only two survey visits have been

undertaken for wintering bird. However, it is stated in section 2.7 of the EclA that “Only a proportion of individuals of each species will be detected on each visit, and some particularly secretive or low-density species, can be elusive and require several visits to detect.”, it is therefore queried why only two survey visits were considered appropriate. Published best practice survey guidelines for wintering birds recommend a minimum of four survey visits. Section 3.6 of the EclA then states that “The woodcock recorded on-site is considered to be a non-breeding wader and gives indication that further survey work should be considered at the Site to give an overall view of how the land is being used by wintering birds.”. It is therefore uncertain whether further wintering bird surveys are scheduled for the future, and this needs to be clarified.

- 5.164 Suffolk Wildlife Trust have also noted that the EclA methodology refers to an out of date publication for Bat Surveys and the more recent published guidelines should inform the work undertaken and be referenced in an updated EclA.
- 5.165 In conclusion it was found that there was insufficient ecological information available for determination in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 ‘Biodiversity – Code of practice for planning and development 2013’. This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).
- 5.166 The Biodiversity Net Gain Assessment: Design stage (CSA Environmental, March 2024) states that the post-development baseline will deliver an increase 0.4 habitat units (0.55%), as well as 7.59 hedgerow units (17.29%). As a result, the calculations show a deficit in habitat units and further units will be required to ensure a 10% net gain via off-site enhancement.
- 5.167 Suffolk Wildlife Trust have also commented in relation to BNG, that while a net gain is likely to be possible for hedgerow units, it is unlikely that habitat units can deliver the minimum level of net gain onsite, and that offsetting is likely to be required. New hedgerow planting onsite should be targeted to compensate for any losses of, and seek to increase, landscape connectivity; this is key for many species, including bats. The Net Gain assessment shows that more than 10% of post-development units are likely to be delivered through vegetated gardens; a habitat considered non-significant which cannot be secured for more than 30 years. Concerns are therefore raised as to whether vegetated gardens should be considered within the final calculation which delivers a gain of 10% above the original baseline value. The Habitat Management and Monitoring Plan (HMMP) should be secured through a S.106 agreement, rather than as a planning condition. This should include provision for remedial actions to be triggered if the required monitoring shows that post-development habitats fail to meet target condition. If onsite remedial measures are unable to deliver net gain, then further off-setting may be required.
- 5.168 If the LPAs are minded to approve the application, it is highlighted that the LPAs will be required to secure a biodiversity gain condition as a pre-commencement requirement, with the maintenance and monitoring secured via legal obligation or a condition of any consent for a period of up to 30 years. The monitoring of

the post-development habitat creation / enhancement will need be provided to the LPA at years 2, 5, 10, 15, 20, 25, 30 any remedial action or adaptive management will then be agreed with the LPA to ensure the aims and objectives of the Biodiversity Gain Plan are achieved.

- 5.169 From the information submitted it is evident that there are a number of aspects which require further survey work and investigation to ensure the LPA fulfils its statutory duties and ensures proposals meet the relevant planning policy requirements. In addition it has not been demonstrated that sufficient Biodiversity Net Gain is proposed and there are concerns that the final proposals in relation to the ecological measures to be incorporated into the development proposals. It is therefore concluded that the requirements of Biodiversity Net Gain have not been met and there is insufficient ecological information on European Protected species (bats, dormouse, Great Crested Newt), Protected species (reptiles), Ancient/veteran tree and Priority species (farmland birds) to demonstrate compliance with Policy DM8.

Habitat Regulations Assessment (HRA)

- 5.170 Local Plan Policy CS17 sets out the requirements for all developments to meet the on and off-site infrastructure requirements needed to support developments, this includes the Council seeking contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Recreational disturbance Avoidance and Mitigation Strategy can be addressed and delivered, including for any measures not classified as infrastructure. The same requirements in regard to HRA are set out in policy DM8 as well.
- 5.171 The development falls within the Zone of Influence for one or more designated European site scoped in the Suffolk Coast RAMS. It is anticipated that new residential development in this location is likely to have a significant effect on the sensitive features of these European designated sites, through increase recreational pressure.
- 5.172 As such it is advised that a suitable contribution to the Suffolk Coast RAMS should be sought from this development. As of the 19 April 2024 the RAMS contribution is set at £142.27 per dwelling within Zone A. Furthermore in consideration of the scale of this development (50+ units) it is recommended that this development include provision for well designed Natural open space that is proportionate in scale.
- 5.173 The SANG proposed (as detailed in the SHRA report) includes:
- 11.5ha of open space and green infrastructure
 - High-quality, informal, semi-natural areas
 - Circular dog walking routes of 2.7 km within the site and/or with links to surrounding Public Rights of Way
 - Dedicated 'dogs-off-lead' areas
 - Signage/information leaflets to householders to promote these areas for recreation

- Dog waste bins
- A commitment to the long term maintenance and management of these provisions.

- 5.174 Ecological advice has been sought to review and advise the LPAs on the HRA and it has been advised that there is concern with the deliverability and appropriateness of the required amount of greenspace proposed. The inclusion of infrastructure such as drainage within the greenspace proposed, as well as some greenspaces potentially containing existing habitats of biodiversity value, is considered to reduce the quantity of the greenspace which can be considered as public open space for mitigation purposes. It has therefore not been adequately demonstrated that the proposed development if permitted can secure the delivery of the avoidance and mitigation measures identified.
- 5.175 Natural England have not raised an objection to the proposed development subject to appropriate mitigation being secured.
- 5.176 In conclusion it has not been adequately justified that suitable on-site mitigation can be secured to meet the identified SANG requirements. In the absence of this mitigation it cannot be concluded that the proposed development will not have an adverse effect on the integrity of the European sites included within the Suffolk Coast RAMS. Until such information is made available the proposal is contrary to Local Plan Policy DM8.

Archaeology

- 5.177 Local Plan Policy DM14 states that the Borough will require that development proposals which may disturb remains below ground are supported by an appropriate assessment of the archaeological significance of the site including, if necessary, the results of a programme of archaeological field investigation. Such assessments should be proportionate to the importance of the site. Specifically for this site, policy ISPA4 requires an Archaeology Assessment to be submitted in support of any application for the site.
- 5.178 East Suffolk in the adopted Suffolk Coastal Local Plan (2022) refer to the site lying in an area of archaeological potential. Cropmark sites of boundaries relating to historic landscape use are recorded to the east, as well as prehistoric artefact scatters. A scatter of medieval artefacts is recorded in the north western part of the site. However, this site has never been the subject of systematic archaeological investigations and previously unidentified remains may exist on the site which could be damaged or destroyed by development.
- 5.179 The submitted archaeology assessment states –

‘The Suffolk Historic Environment Record identifies three entries located within the study site; an Iron Age coin and harness fragment, a scatter of Medieval pottery and coins and cropmarks of probable field boundaries and extraction pits. The Iron Age coin is of special interest as this is a rare find in the area.

Geophysical survey was carried out within all accessible areas of the site (c.30.3ha) and recorded anomalies of probable archaeological origin, including two possible settlement foci with associated enclosures and field systems. The morphology of the anomalies suggests a possible Late Prehistoric and/or Roman date.

During the recent site visit, circular and semi-circular shapes could be made out as discoloured marks in the grass. These are also visible on Google Earth imagery from 2020 onwards and similar features are visible within the fields to the immediate north-east and west of the study site. They are not recorded on the HER and could not be confirmed by the geophysical survey and thus their origin remains currently uncertain.'

- 5.180 This finding is not surprising given that the site subject to this planning application has never been subject to systematic archaeological investigations. The submitted archaeology assessment concludes that :
'.....in correspondence with policies DM14 and SCLP11.7 in the Ipswich Local Plan Review 2018-2036 and the Suffolk Coastal Local Plan (2020) and based on based on the results of the geophysical survey as well as the rarity of the Iron Age coin found in this location will likely require further archaeological investigation – starting with trial trenching.'
- 5.181 In the light of the above conclusion, and the lack of this trial trenching evidence being submitted as part of this application, it is concluded that the submission of this outline is premature, as without addition investigation, it cannot be concluded that there will be no impact on the proposal.
- 5.182 SCC Archaeology confirm that this large site has very high archaeological potential. Geophysical survey (AOC 2023) has shown several areas of previously unknown dense archaeological anomalies suggesting that there may be even more archaeological remains that were not detected. However, this site has never been the subject of systematic below ground archaeological investigation and there is high potential for further unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.
- 5.183 Given the high archaeology potential, lack of previous investigation and large size of the proposed development area, SCC Archaeology recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation in situ of any sites of national importance that might be defined (and which are still currently unknown).
- 5.184 In accordance with Local Plan Policy DM14 and paragraphs 200 and 201 of the National Planning Policy Framework, it is considered necessary that a full archaeological evaluation needs to be undertaken given the size of the site and its very high archaeological potential, in order for the results of the evaluation

along with a detailed strategy for further investigation and appropriate mitigation to inform the development to ensure preservation in situ of any previously unknown nationally important heritage assets within the development area.

Air Quality

- 5.185 Local Policy DM3 Air Quality ensures that the impact of development on air quality is mitigated and ensures that proposals do not negatively impact on existing air quality levels in the Borough.
- 5.186 An Air Quality Assessment (AQA) has been submitted in accordance with the policy requirements. On reviewing the proposed mitigation in section 9 of the AQA, the budget of the Travel Plan (£37,000) is unlikely to be sufficient to cover the cost of implementing its measures, such as the cost of appointing a Travel Plan Coordinator, providing promotional material and events and multi-modal vouchers for the residents of up to 660 dwellings, where the duration of implementing and monitoring the Travel Plan is likely to be at least over several years. Concerns have been raised in relation to the lack of car-club provision.
- 5.187 A separate Damage Costs note has been prepared and outlines Ipswich Borough Council's implementation of the Damage Costs approach to mitigate air quality impacts from large developments. This approach assigns financial costs to potential air quality impacts, enabling assessment of necessary mitigation measures. It's part of the Low Emissions Supplementary Planning Document (SPD), which categorises developments by size and assesses their impact accordingly. The three types of mitigation measures (Type 1, 2, and 3) vary in scale and are determined by the level of damage costs associated with the development. Type 3 mitigation, for large developments, goes beyond basic policy requirements and Type 1 and 2 mitigation. It could include on-site or off-site measures, or commuted sum payments.
- 5.188 A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. Impacts on air quality during the course of construction have been identified and mitigation proposed which can be used to inform a Construction Management Plan secured via planning condition if permission were granted for the proposal. However, the measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with Local Plan Policy DM3.

Railway Line Impacts

- 5.189 The application site is located in close proximity to the East Suffolk Railway Line and Westerfield Train Station and level crossing. A number of public right of way routes extend from and around the site over the railway line by a series of bridges. The railway line which is situated along the site is in cutting.
- 5.190 Due to the close proximity of the Railway line and Rail assets, Network Rail

have been consulted and have responded to the application. Network Rail advise that they are concerned with the impact of the proposed development on Westerfield Station, Westerfield Level Crossing and other nearby level crossings.

- 5.191 With regards to the impacts on Westerfield station, Network Rail are concerned that there will be an increase in patronage of Westerfield Station and useage of Westerfield Station level crossing, particularly when taken in combination with other large development in close proximity to the station. Network Rail request that an assessment taking account of the impact on Westerfield Station and Level Crossings is undertaken so that the mitigation required to accommodate the development can be identified and secured. It is noted that the Transport Assessment submitted does not provide enough details regarding the impacts of the development on the station and level crossings.
- 5.192 It is also noted that there are several footpath crossings in the vicinity of the application site (Westerfield footpath level crossing and Lacy's level crossing) which already provide an extensive walking / running / cycling route on both sides of the railway. The proposed development has the potential to significantly increase the useage of the crossings and therefore increase safety risk. The emphasis of these walking routes as part of the HRA for the site, further enforces the likelihood these routes will be well used by the future residents of the proposed development and will encouraged to do so as part of the HRA mitigation measures of the development.
- 5.193 Network Rail advise that given the close proximity of the railway infrastructure to the development site, that the developer contacts the Network Rail Asset Protection Team in order to agree an Asset Protection Agreement. Other considerations with regards to the noise and vibration impacts of the railway line on the future residents of the development has been considered in more detail as part of the 'Residential Quality including Noise and Vibration' section of the assessment.
- 5.194 The British Transport Police have also commented in respect of the application. No objection has been raised but further consideration is advised in relation to securing the railway line from the development.
- 5.195 It is evident that the close proximity of operational rail infrastructure in proximity to the site could be affected by the proposed development. The submitted Transport Assessment has not adequately shown how the development will affect these assets and the mitigation which may be required to support the proposals. This contrary to Local Plan Policy DM21 in terms of ensuring that any adverse transport impacts resulting from a proposed development can be acceptably managed and mitigated.

Loss of Sport Pitches

- 5.196 Policy DM5 sets out the criteria by which development will be permitted if it involves the loss of open space, sports or recreation facilities. This is supported by Local Plan policy ISPA4 which specifically requires for this site at part f) ii)

the replacement of sports facilities if required to comply with policy DM5.

- 5.197 Part of the application site includes an area used by the adjacent Rugby Club. Sport England have objected on the basis that the proposal does not meet any of the exceptions to their Playing Fields Policy or to accord with paragraph 103 of the NPPF. It is advised by Sport England that the area of playing field to be lost as a result of the proposed development should be replaced prior to the commencement of development by a new area of playing field; of equivalent or better quality, and of equivalent or greater quantity, and in a suitable location, and subject to equivalent or better accessibility and management arrangements. Further it is advised that noise and light assessment are undertaken at the appropriate stage to demonstrate that any residential development adjoining the playing fields does not prejudice the use of those pitches given that they are floodlit and used in the evening.
- 5.198 In this case Sport England states that the proposal would result in the loss of an existing playing field which has been used for some 31 years, which as demonstrated within the East Suffolk Playing Pitch and Outdoor Sports Strategy and Action Plan (November 2021) and the Rugby Football Unions comments, demonstrates a need for existing rugby pitches to be protected.
- 5.199 An Open Space Assessment has been submitted as part of the application which identifies a significant surplus of sports pitches in the local area, it also explains that the useage has only ever been in connection with the rugby club which is a private facility and not provided as playing field for public use; its useage has only ever been temporary by way of a series of temporary planning permissions, the last of which expired in 2019 and the permitted useage is heavily restricted to only 2.5 hours per week (Sunday morning between 10.00am and 12.30pm).
- 5.200 The assessment has been considered by Sport England who do not consider it to be a robust nor up-to-date assessment, that adequately demonstrates that there is an excess of playing field provision, which will remain the case should the development be permitted nor that the site has no special significance to the interests of sport.
- 5.201 The Ipswich Rugby Football Club itself has commented on the application and advise that the application's statement that there is adequate provision for sports pitches in the area to mitigate the loss of facilities is inaccurate. The club is active and growing and the loss of pitches would be detrimental.
- 5.202 Contrary to the case made by the applicant, it is evident that the pitches are in use and there is a demand for this type of facility. The Local Plan policy recognises this and specifies that replacement pitches will need to be in place when bringing forward this site.
- 5.203 The proposed development would result in the loss of some rugby playing pitches and their replacement is required in order to comply with criteria f)ii) of policy IPSA4 and Policy DM5 of the Local Plan.

Contamination and Ground Conditions

- 5.204 Local Plan Policy DM18 sets out the considerations to ensure the quality of life of occupiers of new development is protected, contamination is one of these considerations. The Local Plan recognises that development on contaminated land can expose people to a wide range of potential health risks and can mobilise contaminants. Applicants who wish to develop suspected contaminated land will be required to undertake a thorough investigation of the site to determine any risk to human health and controlled waters (including groundwater). Relevant remediation and mitigation measures will need to be built into development proposals to ensure safe, sustainable development of the site.
- 5.205 A Phase II report was submitted and concludes that no remediation is necessary. IBC Environmental Protection have considered the submission and advised that the assessment is satisfactory. A condition to secure a watching brief is considered appropriate in the event that unforeseen contamination is encountered during any works on the site.
- 5.206 Subject to appropriate conditions to secure a watching brief, it is concluded that the proposed development complies with Local Plan Policy DM18 in respect of Contamination issues.

6. Conclusion

This is a part Outline application relating to the proposed development of 660 dwellings alongside the provision of associated non-residential uses, open space and other relevant infrastructure. It is also a part Full application for the means of access between the site and surrounding areas. The application site covers land in both Ipswich Borough Council and East Suffolk Council boundaries.

Whilst the application site is allocated for housing, it is apparent from the assessment of the planning application that the proposals raise a number of fundamental issues which either do not comply with policy or are not sufficiently evidenced to demonstrate they comply with policy.

These issues relate to: the lack of a masterplan; transport concerns related to the assessment, proposals and mitigation; impacts on the character and amenity of Humber Doucy Lane; impacts on landscape and heritage assets; flooding and drainage strategy assessment information and mitigation; ecology and BNG concerns; mitigation proposed for Habitat Regulation Assessments; Archaeology concerns; Air Quality mitigation; loss of sport pitches; quantum of housing proposed; open space and green infrastructure proposals; and the absence of a s106 agreement to secure necessary mitigation, affordable housing and infrastructure.

Points of concern and matters which needed to be addressed through the application were raised by both council's during the pre-application discussions with the applicants. It was also advised that pre-application discussions

continued to resolve matters before an application was submitted, however an application was submitted in March 2024 contrary to both Local Planning Authority's advice.

The application site benefits from land allocations in both LPA's Local Plan. Both LPA's have a 5 year Housing Land Supply, neither of which include this site. It is recommended that the application is refused on the basis that the application is severely deficient and the scheme fails to comply with the specific requirements of the land allocation policies within the Ipswich Borough Council and East Suffolk Council Local Plans. In addition to this, the scheme fails to meet a number of other requirements of the NPPF, other policies within the Ipswich Borough Council Local Plan & East Suffolk Council Local Plan, along with being contrary to relevant Supplementary Planning Documents and other material planning considerations, as detailed in the reasons for refusal below.

7. Recommendation

It is recommended that the application is refused for the following reasons:-

1. Masterplan

A masterplan has not been submitted in support of the application. A series of Parameter Plans and a Framework Plan have been submitted, but these fail to provide the necessary detail to ensure the development of the site comes forward in a coordinated and comprehensive manner.

The Masterplan should set out the layout, scale, landscaping, and appearance of the entire site, including any public spaces and infrastructure. This should be used to shape the reserved matters applications and inform condition compliance. The Design and Access Statement contains some master plan elements and is labelled as such but this information should be combined into a standalone plan and should be more detailed than currently presented.

By not completing this next stage of design there is a missed opportunity to holistically consider all aspects of the development together (such as infrastructure, transportation, social amenities, open spaces, and building design). In the absence of a masterplan certain policy objectives related to amenity and connectivity cannot be fully assessed and the extent to which the development is sustainable and resilient is difficult to assess. In addition, aspects of the scale, density and layout of the proposed development shown in the submitted parameter plans raise concerns and are not supported by a masterplan. The absence of a masterplan at this stage means that there is an absence of meaningful engagement with the community to shape the proposals being brought forward.

The absence of a masterplan is contrary to local plan policies and limits the ability to ensure the development which comes forward is coordinated and

comprehensive. The requirement for the site to be Masterplanned is explicit in the site allocation policy ISPA4. The proposals therefore fail to meet the requirements of ISPA4 and meet the expectations of the NPPF set out in paragraphs 41, 74 (c), 131 and 137. Furthermore, it cannot be demonstrated that other matters related to amenity, design, sustainability and connectivity can be secured in accordance with the NPPF (paragraphs 135 and 139) and Local Plan Policies DM1, DM12 and DM18.

2. Transport

By virtue of the scale and nature of the proposed development, the impacts of the development on the surrounding highway network need to be fully assessed in order to understand the acceptability of the proposals and the mitigation required. The development proposals will also be expected to ensure opportunities to promote walking, cycling and public transport use are identified and secured.

Further information and justification is required to support the trip generation information assumed and junction modelling analysis undertaken. It is considered necessary to ensure the impacts of the development have been accurately and fully considered and required mitigation identified. There is a concern that the distribution of trips has not been accurately assessed and necessary mitigation such as improvements needed at the A1214 and Tuddenham Road Roundabout have not been fully identified. Furthermore impacts on the Strategic Road Network and rail infrastructure (including Westerfield Railway Station) in the vicinity of the proposals need to be factored in and assessed in order to conclude acceptability and any mitigation required.

Internal connectivity between parcels is shown within the cycle and pedestrian movement Parameter Plans. The connectivity and permeability between parcels is considered inadequate and should be better designed to encourage and promote walking and cycling in and around the site. In particular the connections between the main parcel of development and eastern parcel (residential areas E1 and E2) involves a connection which should be more direct and convenient than presently proposed.

Further consideration also needs to be given to off-site connections to existing routes and key destinations. At present the proposals fail to demonstrate that cycle and walking will be sufficiently promoted and prioritised off-site within neighbouring areas and to key destinations. An off-site walking and cycling strategy should be developed which would recommend improvements to ensure safe and suitable movement for pedestrians and cyclists and to maximise accessibility to sustainable modes of travel.

Travel Plan framework has been submitted in support of the application, however whilst some measures included would be acceptable, additional measures would be required to demonstrate that sustainable travel options were being maximised and the value of funding estimated is considered

insufficient to fund the measures identified and ensure effective sustainable travel is promoted within the proposed development.

In conclusion the proposed development is not adequately supported and evidenced by a complete and robust Transport Assessment. It therefore cannot be ascertained or relied upon what the impacts of the proposed development will be or what mitigation will need to be secured in order to bring forward the development. In addition the connectivity within and around the site and to key destinations is also significantly lacking and poorly evidenced. Combined with the inadequate Travel Plan proposals, it cannot be concluded that the proposed development could or would be able to maximise sustainable travel modes such as walking, cycling and public transport. The proposed development is therefore found to be contrary to the NPPF (paragraphs 96, 108, 114, 116 and 135(f)) and Local Plan Policies ISPA4 and DM21.

3. Humber Doucy Lane

The largest development parcel is accessed via a signalised junction onto Humber Doucy Lane opposite Inverness Road. The proposed junction will involve the removal of hedgerow and road widening as well as traffic lights. There are deficiencies identified within the Transport Assessment and further information required in order to ascertain the acceptability of the junction design and demonstrate its acceptability.

Notwithstanding this there is a fundamental concern with the principal of the junction in this location. Humber Doucy Lane is particularly sensitive in its character and this particular location on Humber Doucy Lane is opposite existing single storey properties and heading west towards less built development and more rural edge to this part of the road. The signalised junction is considered to have an urbanising effect on this part of the road which has not been adequately justified nor impacts fully identified within the relevant assessment information. The potential visual impact of the junction and impact on the amenity of existing residents in this location is not considered to have been adequately justified or outweighed by the documents submitted in support of the application.

Further east along Humber Doucy Lane there is more built development visually present as the houses rise to two-storey and the character of the road begins to feel more urban. It is considered that the main signalised access into the site would be better located opposite Sidegate Lane in terms of visual impact and also in terms of having a more direct integration on Sidegate Lane and maximising sustainable connections to the town.

The proposed highway junction opposite Inverness Road is considered to negatively impact on this part of the Humber Doucy Lane and the information submitted fails to demonstrate it will be appropriate in terms of accessibility and highway safety. The proposals are therefore considered to be contrary to the

NPPF (paragraphs 114 and 115) and Local Plan policies IPSA4, DM12, DM18 and DM21.

4. Landscape and Heritage Impact

The proposed development of the site will bring development into a previously undeveloped site and expand the urban edge of Ipswich into the rural landscape of East Suffolk. A suitable transition space is therefore required between the new development and wider countryside along the northern edge of the application site.

The proposals do include an area of open space along the north-eastern boundary to act as a transition space between the proposed built development and wider Countryside. The transition space is however considered to be too narrow in some areas. The transition space has also been designed to accommodate a number of different uses which will in turn generate a level of activity that will undermine its effectiveness as a space that successively enables a transition from the urban edge of the develop to a quieter, less intense countryside character.

The quality and design of the transition space is also important to help protect the heritage assets along the northern boundary and more space and planting within this buffer is considered necessary to achieve this.

The design and quantity of space proposed along the north-eastern edge of the development is considered insufficient in creating the necessary transition space and separation between the new development and countryside beyond. It also fails to provide the mitigation required to protect the identified heritage assets which are to the north of the application site. The proposals are therefore considered to be contrary to the NPPF (paragraphs 135 and 139) and Local Plan policies IPSA4, DM12 and DM13.

5. Flooding and Drainage Strategy

A Flood Risk Assessment has been submitted with the application, but it fails to adequately consider the existing watercourse network around the site. Without this being fully considered it cannot be concluded that the proposed development would not have an adverse impact upon the existing watercourse network and that there would not be an increase in flood risk to the surrounding area.

The submitted Drainage Strategy fails to comply with the Suffolk SuDs Guide through an overreliance of deep infiltration structures and a lack of at-source SuDs measures to reduce the need for below ground SuDs features.

The Flood Risk Assessment submitted is deficient in a number of aspects and it cannot be concluded that the proposals comply with the requirements of DM4 and adequately demonstrates that the new development would not increase off-site flood risk. In addition, the proposed drainage strategy is not considered

to follow the advice set out within the Suffolk SuDs Guide, Suffolk Design for Streets Guide to ensure a drainage strategy which provides adequate protection from flooding and is safe for the lifetime of the development as set out in the NPPF (paragraphs 173 and 175) and Local Plan Policy DM4.

6. Ecology and BNG

From the information submitted it is evident that there are a number of aspects which require further survey work and investigation to ensure the Local Planning Authority fulfils its statutory duties and ensures proposals meet the relevant planning policy requirements.

In addition, it has not been demonstrated that sufficient Biodiversity Net Gain is proposed and there are concerns with the final proposals in relation to the ecological measures to be incorporated into the development proposals. It is therefore concluded that the requirements of Biodiversity Net Gain have not been met and there is insufficient ecological information on European Protected species (bats, dormouse, Great Crested Newt), Protected species (reptiles), Ancient/veteran tree and Priority species (farmland birds). The proposal is therefore contrary to the NPPF (paragraph 186) and Local Plan Policy DM8.

7. HRA

Local Plan Policy DM8 requires that any development with the potential to impact on a Special Protection area will need to be supported by information to inform a Habitats Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017, as amended (or subsequent revisions).

The application site is within 13km of the Stour and Orwell Estuaries Special Protection Area (SPA); the Stour and Orwell Estuaries Ramsar Site; the Sandlings SPA; the Deben Estuary SPA and the Deben Estuary Ramsar Site.

Information to inform an HRA report has been submitted and includes measures to mitigate the impact of the development on the integrity of any European designated site. This includes the provision of on-site recreational greenspace but there is concern with the deliverability and appropriateness of the required amount of greenspace proposed. The inclusion of infrastructure such as drainage within the greenspace proposed, as well as some greenspaces potentially containing existing habitats of biodiversity value, is considered to reduce the quantity of the greenspace which can be considered as public open space for mitigation purposes. It has therefore not been adequately demonstrated that the proposed development if permitted can secure the delivery of the avoidance and mitigation measures identified.

Further information is therefore required before it can be concluded that the proposed development will not have an adverse effect on the integrity of the European sites included within the Suffolk Coast RAMS. Until such information

is made available the proposal is contrary to the NPPF (paragraph 186) and Local Plan Policy DM8.

8. Archaeology

In accordance with Local Plan Policy DM14 and paragraphs 200 and 201 of the National Planning Policy Framework, it is considered necessary that a full archaeological evaluation needs to be undertaken given the size of the site and its very high archaeological potential, in order for the results of the evaluation along with a detailed strategy for further investigation and appropriate mitigation to inform the development to ensure preservation in situ of any previously unknown nationally important heritage assets within the development area. The proposal therefore fails to comply with the NPPF (paragraphs 200 and 201) and Local Plan Policy DM24.

9. Air Quality

A suite of potential Type 3 measures is outlined in the Damage Costs Note, including low emission transport, cycling facilities, air quality monitoring programs, and information services. The measures proposed by the applicant in their damage cost calculations are judged to be insufficient to mitigate the harm arising through this development, and it therefore cannot be concluded that the proposed development would accord with the NPPF (paragraph 192) and Local Plan Policy DM3.

10. Loss of Sport Pitches

Part of the proposed development includes land which is used for sports pitches. No replacement of the lost pitches has been proposed. Information has been provided within the application submission to justify the loss without replacement, however the Council is aware of contrary information which suggests the pitches are in use and the demand is such that replacement provision of the pitches is warranted.

The proposed development would result in the loss rugby playing pitches and their replacement is required. No replacement pitches are proposed and therefore the proposal fails to comply with the NPPF (paragraphs 88(d), 96(c), 97(a) and 103) and Local Plan Policies IPSA4 (criteria f)ii)) and DM5.

11. Housing

The housing allocation for this site envisaged a certain number of houses at the Local Plan stage. The proposed development exceeds the Housing allocation number. The increase in the number of dwellings proposed is considered to result in a number of pressures on the layout of the development and resulting impacts on the surroundings of the site. In particular, the parameter plans are failing to provide adequate spaces around the application site to comply with relevant open space standards, provide sufficient space to the rural edge to the north and protect the character of Humber Doucy Lane to the south.

The number of dwellings proposed is above the allocation identified for this site and results in a number of impacts on the site and surroundings which are considered to affect the acceptability of the development coming forward and would have an adverse impact on the character and appearance of the site's surroundings. The proposal therefore fails to comply with Local Plan Policies ISPA4.

12. Open Space and Green Infrastructure

The quantum and quality of the open space proposed and identified within the Green & Blue Infrastructure Plan fails to meet the relevant policy requirements. The quantity of particular open space typologies is below the required amount identified within the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017) and therefore contrary to Policy DM6 of Local Plan.

The location and distribution of certain open spaces is also considered unacceptable in terms of recreational space and childrens spaces being limited to linear routes and transitional spaces at the periphery of the development. More generous spaces should be integrated within the residential parcels of the development. To protect the sensitive character of Humber Doucy Lane a larger set back of the development from Humber Doucy Lane should be shown.

The proposed Green & Blue Infrastructure Plan fails to demonstrate that a suitable range of open spaces will be provided and fails to demonstrate that the spaces which are proposed will be well overlooked, meaningful, useable and suitably distributed throughout the site, contrary to the NPPF (paragraphs 102, 135 and 139), Local Plan Policy DM6 and the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017).

13. S106

If consent were to be granted for the development of this site a S106 Legal Agreement would be required at this Outline Stage in order to secure necessary mitigation, housing mix and type, affordable housing and infrastructure to support the proposed development. At the point of decision no S106 Legal Agreement has been agreed and therefore Local Plan Policies ISPA4, CS8, CS12, CS16, CS17, DM8 and DM21 which require mitigation, affordable housing and infrastructure are not complied with.