

**From:** Canning Tye, Alice [REDACTED] >

**Sent:** 27 November 2024 16:11

**To:** James Meyer <[REDACTED]>

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Land at Humber Doucy Lane, Ipswich (Planning App Refs. 24/00172/OUTFL and DC/24/0771/OUT) Appeal - HRA Mitigation Measures

Dear James,

Thank you for getting in touch. The 10ha is a reference to our [green infrastructure \(GI\) standards](#) which states that a medium sized neighbourhood natural greenspace of 10ha should be accessible within 1km of a development (please see appendix 2 for the size proximity criteria). Please note that this is a minimum of what is required.

In the body of our advice letter we go on to advise that the full 11.5ha, along with additional details, is secured. We note that since our response, your authority has adopted the Healthy Environments SPD which specifies a guidance figure for SANG provision using 8hectares of SANG per 1,000 people.

I hope this is of help.

Kind regards,

**Alice Canning Tye** (she/her)

**Higher Officer, Sustainable Development, Norfolk and Suffolk Area Team**  
Natural England, Dragonfly House, 2 Gilders Way, Norwich, Norfolk, NR31UB

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



**From:** James Meyer [REDACTED]  
**Sent:** 27 November 2024 12:08

**To:** Canning Tye, Alice <[REDACTED]>

**Cc:** Ben Woolnough <[REDACTED]>  
[REDACTED]  
[REDACTED]

**Subject:** Land at Humber Doucy Lane, Ipswich (Planning App Refs. 24/00172/OUTFL and DC/24/0771/OUT) Appeal - HRA Mitigation Measures

Dear Alice,

As you may be aware the planning applications (IBC and ESC planning refs. 24/00172/OUTFL and DC/24/0771/OUT) for the proposed development at this site were refused and that decision is now being appealed (appeal refs. APP/R3515/W/24/3350674 & APP/X3540/W/24/3350673). One of the reasons for refusal relates to the necessary onsite Habitats Regulations Assessment mitigation measures (provision of public open space/SANG) and whether these are able to be delivered adequately.

In the summary section of Natural England's consultation response to the planning application (your letter of 26<sup>th</sup> April 2024, your ref. 471920), a reference is made to a "*minimum 10ha area of suitable alternative natural greenspace*" being required as part of the development to mitigate recreational disturbance impacts on European designated sites. However, it is unclear where this figure is derived from as it is not a number included in the applicant's Information to inform Habitats Regulations Assessment report (which states that 11.5ha of open space and green infrastructure), nor is it included in either of the allocation Local Plan policies for the site or any Supplementary Planning Documents which the LPAs have adopted (including ESC's Healthy Environments SPD). Given the reason for refusal on this matter, it would assist the appeal process if you were able to clarify where the 10Ha figure is derived from and what it is based on please?

Both the LPAs and appellant's team are currently working on their proofs of evidence and statements of common ground so please note that the appellant's agent is copied in to this e-mail so that both sides are aware of the answer to this query.

Kind regards

James

**James Meyer BSc (Hons) MCIEEM | Principal Ecologist**  
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