



Save Our Country Spaces (SOCS)

SOCS - Ipswich Borough Council Planning Application 24/00172/OUTFL "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 ... etc."

Ipswich Development Management say, To: development.management@ipswich.gov.uk

OBJECTION; due to failure to offer sufficient up to date information to achieve Sustainable development, which takes into account Cumulative and Compound impacts **as well as new rulings on 'Deliverability under NPPF 2018.'**¹

For your information; the Ipswich Borough planning portal (on the 'view map' link) shows an incorrect outline for this development – just around the Westerfield House complex. This could mislead someone who hasn't looked at the detailed application documents and hasn't seen the physical site notices.

What concerns the Statutory Stakeholders (and non statutory) have identified for CS10 so far, and with whom SOCS agree;

- Anglian Water (following private conversations with AW)
- Westerfield Parish Councils
- Tuddenham Parish Council
- North Fringe Protection group (attached as Appendix A)
- NHS Estates (to be posted later)

SOCS strongly object to this application on the following grounds:

We strongly object to the Statement of Community Involvement and have submitted online responses which have been glossed over by the Developer. NFPG state, the developer summarises our position as, *'The group highlighted the necessity of early engagement with local community groups to ensure transparency and collaboration. It also discussed adherence to local plan requirements, ensuring that up and coming projects align with established guidelines and policies.'* Unfortunately this application fails to reference or adequately address our 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).'

1. SOCS believe the application is **outside the scope of the adopted Local Plan (2022)** – which already has sufficient provision for homes until 2031. These homes are not needed to meet existing targets, so **this application is premature.**
2. **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.
3. **Other ICS 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.
4. **Breach of CS10 and breach of Policy IPSA4**

¹ <https://www.planoraks.com/posts-1/deliverability>

SOCS recall the **HDL sequencing requirements required by the Planning Inspector** to make the Ipswich Local Plan sound and to resist any attempts by developers to jump the queue and make premature applications (such as this one, not online till 2031).

SOCS have extracted the relevant text below, from **CS10 discussions**:

Paragraph 169 of the Inspector's Report states that,

"In terms of proximity to local facilities, Rushmere Primary School and Northgate High School are within close walking distance, but currently there are no available school places at the primary school."

Whilst Paragraph 170 states, *"Nevertheless, to ensure that the Plan is effective and positively prepared in co-ordinating the provision of school places with housebuilding at HDL, MM17 adds two new criteria into **Policy ISPA4**, so that development at HDL is **either triggered by the provision of primary school capacity on IGS, or an agreement with the LEA to provide a primary school on the HDL site.**"*

Unless the developers agree to provide a new primary school on its site, this development is premature and non-compliant with the Local Plan as stipulated by the Planning Inspectors. The current consultation fails to recognise this requirement and the Vision fails to include a commitment to ensuring educational infrastructure for residents nor proposes how it will be provided as stipulated by the Planning Inspectors"

This application doesn't seem to ensure that the required provision of a new school will be met.

Projected timeframes.

Site Reference	Planning application ref/DPD policy ref	Type of permission (Allocation, Outline, Reserved Matters, Full)	Parish/Ward	Name and address of site	Greenfield/Brownfield	Available	Suitable	Achievable in 5 years	Site Area	Total number of dwellings built on site	Total residual number of dwellings under construction, permitted or planned	Total number of dwellings on site	Number of residual dwellings which are expected to be completed in 5 years	2019/20 (Current Year)	2020/21 (Yr 1)	2021/22 (Yr 2)	2022/23 (Yr 3)	2023/24 (Yr 4)	2024/25 (Yr 5)	2025/26 (Yr 6)	2026/27 (Yr 7)	2027/28 (Yr 8)	2028/29 (Yr 9)	2029/30 (Yr 10)	2030/31 (Yr 11)	2031/32 (Yr 12)	2032/33 (Yr 13)	2033/34 (Yr 14)	2034/35 (Yr 15)	2035/36 (Yr 16)	Total Identified Supply	
IP180 (part)	16/00608	Strategic Devt Site (Outline pending)	Whitton	Ipswich Garden Suburb Phase N2a (Crest - North of Railway and east of Henley Road)	G	Yes	Yes	Part	42.7	0	1100	1100	351		9	72	72	90	108	40	72	75	113	108	108	96	72	65	0	0	1,100	
IP182 (part)		Strategic Devt Site	St Margaret's	Ipswich Garden Suburb Phase N3a (Mersea - East of Westernfield Road)	G	Yes	Yes	Part	53.1	0	912	912	120		0	0	0	48	72	72	72	72	72	72	72	72	72	72	72	72	912	
IP185, part IP182 & IP180		Strategic Devt Site	St Margaret's & Whitton	Ipswich Garden Suburb Phase N1b (Ipswich School), Phase N3b (Red House Farm) & Phase N2b (Other)	G	Yes	Yes	No	25.6	0	456	456	0		0	0	0	0	0	0	0	0	0	0	0	72	96	96	96	96	456	
ISPA4.1		Allocation (ISPA4)	Rushmere	Humber Doucy Lane adjacent to Tuddenham Road	G	Yes	Yes	No		0	496	496	0														56	110	110	110	110	496
Various	Various			Sites with fewer than 5 dwellings	G	Yes	Yes	Yes	2.5	1	54	55	48	6	13	13	12	10													54	
Various	Various			Sites with fewer than 5 dwellings	B	Yes	Yes	Yes	3.5	-3	108	105	78	30	26	24	20	8													108	
Windfall				Windfall sites	B					0	700	700	150				50	50	50	50	50	50	50	50	50	50	50	50	50	50	700	
Total										712	9,028	9,740	2,164	352	360	316	355	492	641	547	487	675	772	617	613	685	625	607	461	423	9,028	
Brownfield total														1,303	302	326	190	164	270	353	339	221	430	515	365	328	284	240	264	183	145	4,919
Greenfield total														861	50	34	126	191	222	288	208	266	245	257	252	285	401	385	343	278	278	4,109

SOCS believe this is a **breach of the Ipswich Garden Suburb SPD and Local Plan Policy CS10**.

- If this application is passed, it may render the **Local Plan out of date**.
- 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.
- There seems to be **insufficient information in this application on the provision for foul drainage and the receiving environment**, so SOCS contend and believe it should have **failed the validation checklist process** on this point.

Other considerations to be taken into account before determination; Ipswich Local Plan (K22_0.pdf) Ipswich Local Plan Review – Policy CS10 – Ipswich Garden Suburb

Actions/Tasks

Main Modification to Local Plan Review Policies Map Key (A3) – Ipswich Garden Suburb change from Location for Secondary School to Broad Location for Secondary School

IBC have considered the Inspector's request to consider the wording within Policy CS10 that relates to the purpose of the Ipswich Garden Suburb SPD. The relevant part of the policy is as follows:

An Ipswich Garden Suburb supplementary planning document (SPD) has been adopted, which will:

- a. guide the development of the whole Ipswich Garden Suburb area;
- b. amplify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;
- c. identify the detailed location of a district and two local centres and other supporting infrastructure; and
- d. provide guidance on the sequencing of housing and infrastructure delivery required for the development.

At the Hearing Phase2 Planning raised their concerns on this wording and referred to their Matter 6 Statement with alternative wording. IBC are satisfied that the wording above, with the exception of point C, identifies that the Ipswich Garden Suburb SPD only expands on those policy requirements detailing the environmental, social, design and economic objectives relevant to the attainment of the development and use of land. It is also noted that this is an adopted Policy.

The Ipswich Garden Suburb Supplementary Planning Document is a detailed document intended to guide this important strategic housing allocation. The text above clearly identifies its remit, in line with the relevant regulations, for guiding applications coming forward.

IBC considers that the generalised wording proposed by Phase2 Planning does not improve the clarity of the policy and is an attempt to water down the consideration of the SPD when assessing any planning application on the IGS.

Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012, IBC have considered the wording at point (c.) which was specifically raised within the Hearing and propose a Main Modification to Policy CS10 to replace "identify" with "guide" so that it would read:

- c. identify guide the detailed location of a district and two local centres and other supporting infrastructure; and

IBC's position is that this change to the wording is sufficient to address the point raised.

Phase2Planning have also proposed new wording for the following part of Policy CS10, as follows:

"Development proposals will be required to demonstrate that they are in accordance with the SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD."

The purpose of the SPD is to guide how this strategic housing allocation can be brought forward comprehensively and to ensure that any individual development does not jeopardise this. The Ipswich Garden Suburb, through Policy CS10, Table 8b, the Policies Map, the IGS SPD and IGS IDP, is a well-planned, comprehensive sustainable urban extension to Ipswich with housing supported by appropriate infrastructure. In the absence of an overarching planning permission, it is key that individual sites on the IGS do not prejudice other development phases. IBC's clear vision on how this strategic site will work collectively is set out in the IGS SPD and this part of Policy CS10 makes that clear for any application which is to be submitted to the Local Planning Authority.

The wording that Phase2Planning have proposed in their Matter 6 Statement removes the need for development to avoid prejudice to other development on the IGS and undermines the Policy intention to ensure a comprehensive, sustainable urban extension to Ipswich. However, it is accepted that the use of the words "in accordance" could be more amended to better reflect the role of the IGS SPD.

IBC's position is to propose a Main Modification to Policy CS10 to read:

Development proposals will be required to demonstrate that they are in accordance with the SPD how they have had regard to the principles, objectives and vision of the adopted SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the comprehensive development of the area as set out in the SPD. '

Further considerations to be taken into account before determination;

- a) Economy/inflationary issues plus 'viability' issues- this will trigger a viability review SOCS believe.
- b) Water shortages and Food security /'Best & Most Versatile Farmland
- c) IGS SPD CS10 requirements being satisfied? Country Park -development & delivery impacting on all sites under CS10 IGS SPD²
- d) Current Enforcement actions against 'master developer" CREST by IBC
- e) Interdependency and Infrastructure delivery plan delays difficulties
- f) New and pending Suffolk wide national guidance - Biodiversity Net Gain, Air Quality Action Planning, Public Health requirements (on Particulates and respiratory)³ Air pollution causes harm at all stages of life – report
- g) Natural England Great Crested Newts and legislative Biodiversity requirements
- h) new legislation pending (Levelling upor down..? and regeneration ... or not...!) Huge implications for North Fringe - is this why they are rushing to get full access road permission?
- i) England's adoption of Schedule 3 is a watershed moment ⁴
- j) **Transport/road safety issues- a huge issue for locally impacted communities.-** (Rushmere, Westerfield and Tuddenham)

Despite the intervening years, it would appear few of the substantive concerns relating to **CS10** raised have been addressed. Nor have concerns raised during the pre-application consultation /Hybrid Application 2023/2024 been satisfied.

Neither have they been adequately addressed within this 'hybrid' Application.
Some key Statutory Consultees have issued a holding objection.

We suggest the Application is inadequate, proposals DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) nor acknowledge recent Michael GOVE announcement on Levelling Up & Regeneration with Community involvement & those views taken into account.

NPPF /Bruntland NOT TAKEN FULL ACCOUNT OF CUMULATIVE AND COMPOUND ADVERSE EFFECTS:

Requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The Sustainability Assessment does not appear to take account of the cumulative effect of Core Strategy Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.

2 <https://westerfield.onesuffolk.net/assets/Meetings/Minutes/2023-03-21-Westerfield-PC-Minutes-DraftB.pdf> The developer, Crest Nicholson's milestones are slipping and being pushed back (6 to 18 months late), for example, opening of the pedestrian/cycle railway crossing. The planning approval is aligned with phases needing to be completed and residents occupying houses. Country Park also continues to cause flooding to the gardens of residences in Lower Road. The PC agreed to raise a formal complaint to Ipswich Borough Council's Planning Department as the Henley Gate development was not adhering to the agreed planning application.. Cllr Hudson agreed to document the complaints (with input from Cllr Austin's list of issues) and Clerk Gooch would submit this on behalf of the PC

3 <https://www.bbc.co.uk/news/uk-england-london-65296752> **Imperial College The team from Imperial's Environmental Research Group looked at evidence from more than 35,000 studies over 10 years.** As part of the research, the team looked at studies from the World Health Organisation (WHO), the UK Committee on the Medical Effects of Air Pollution (COMEAP), the Royal College of Physicians (RCP), the Health Effects Institute, and the International Agency for Research on Cancer (IARC).

4 <https://www.newcivilengineer.com/sponsored/englands-adoption-of-schedule-3-is-a-watershed-moment-17-04-2023/>
Across the UK, sewage networks are buckling under the strain of climate change and urbanisation. The mounting pressure on our aging sewage infrastructure is resulting in storm overflows being discharged more frequently into British rivers, lakes and oceans. Currently new developments in England have an automatic legal right to connect surface water drainage to nearby sewage infrastructure – increasing the burden on aging infrastructure. But recent developments mean that's likely to change, with England set to adopt Schedule 3 of the [Flood and Water Management Act 2010](#) and make sustainable drainage systems (SuDS) a mandatory requirement for developments over 100m². So, what will this change mean for developers in England? Unlike England, Wales [fully implemented Schedule 3 in January 2019](#). This made SuDS mandatory on all new developments of more than one dwelling house, or where the construction area is 100m² or more. As a result, developers must demonstrate their compliance with Schedule 3 in planning applications, with the installation monitored and handed over from developer to the SuDS Approving Body (SAB). This approach gives the body that will ultimately be responsible for the SuDS control over their design and implementation. As Wavin product manager for urban climate resilience Martin Lambley points out: "Ultimately [the local authority] are the biggest stakeholders, so why shouldn't they have management of it? Community floods are the responsibility of the authority, so this gives them the power to make sure it's done properly and then gives them control over it."

There has been a growing recognition of the adverse cumulative impacts of poorly delivered development, unwise planning approvals - (often due to the pressures on Local Authorities of the NFPP 5 year House supply issue) - compounded by the failure of the Local Plan system (as well as NPPF) to deliver sustainable expansion, sustainable economic growth and housing delivery. Mr Gove spoke of this recently. Public opinion and feedback from residents to us indicate, that over the time, areas of concerns raised by residents and stakeholders have not been addressed nor sufficient mitigation established to have any confidence in either the need, viability or sustainability of this application.

The Key Sustainability issues and concerns raised by stakeholders and the public to CS10 and the other IGS developments) have remained essentially constant since these proposals were put forward in the 2004 Local Plan Process.

There is now an imperative to address issues such as Food security & protection of Grade 2&3 'Best & Most Versatile Land', address impacts from Air pollution and particulates, mitigate against increasing flood risks and foul sewer contamination, to halt biodiversity loss & survey to protect Red House/Millennium Cemetery Great Newts on Westerfield Watercourse, in order to address the Climate Change & Emergency and meet rigorous new targets on this before it is too late.

Principle Community Concerns collated by SOCS and NFPG

1. <u>DRAINAGE</u> , Surface Water Drainage problem and Westerfield Water Course, Millennium Cemetery- SWALES
2. FLOODING LIKELIHOOD may increase at Westerfield (Climate Change and Climate emergency requirements)
3. <u>SEWAGE PROPOSALS INADEQUATE</u> & likely to add to existing problems - Anglian Water are aware - multiple holding tanks feeding existing combined sewers is inadequate. WHAT ON SITE 'LAND MANAGEMENT COSTS'-SWALES, DRAINAGE, FLOOD MITIGATION, ETC WILL FUTURE RESIDENTS HAVE TO PAY?
4. <u>TRAFFIC PROPOSALS</u> AND ADVERSE IMPACTS ON EXISTING RESIDENTS - no solutions <u>/ no traffic survey of impact on villages EastSuffolk Council area.</u>
5. <u>AIR POLLUTION</u> and impact on our children's health inadequate. Air Pollution Action Planning does not factor in AQ requirements identified by SCC and others.
6. <u>ADVERSE PRESSURES ON HOSPITALS, SCHOOLS & ACCESS TO GPs and SOCIAL CARE</u> The 'Health Impact Assessment' needs redoing and space allocated for a GP Surgery as well as School places provided The lack of plans for health provision here which has triggered a HOLDING OBJECTION from SNEE ICS.
7. <u>ADVERSE EFFECTS OF ROAD WIDENING and REMOVAL OF TREES & VERGES</u> May be affected by land ownership and deeds
8. LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND Grade 2 and 3 – food security risks
9. REMOVAL OF TREES, HEDGEROWS, HABITATS – Rare Trees and TPOs - Loss of amenity/heritage
10. RED HOUSE HISTORIC COUNTRY PARK – Local Listed and gun placement, historic asset loss and archaeology
11. <u>BIODIVERSITY LOSS PROTECTED SPECIES</u> - https://socsnews.blogspot.com/2015/12/please-help-record-important-sightings.html recorded and logged on site - and adjacent adjoining sites - Great Crested Newts, badgers, owls and bats, hedgehogs. <u>NATURAL ENGLAND and Environment Agency required surveys</u>
12. <u>PROBLEMS WITH ACCESS AND EXIT</u> - Road Safety issues with Hump Back Bridge, road constraints, no drains, no footpaths, no lighting, congestion with unsafe entrances, school, hockey club etc public access dangerous at Tuddenham Road Access Point. Level Crossing Westerfield.
13. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?
14. POSSIBLE PROBLEM WITH ADEQUATE WATER SUPPLY ANGLIAN WATER COMMENTS IN early 2000

Transport/Road Safety issues-

a huge issue for locally impacted communities.- (Rushmere, Westerfield and Tuddenham)
We are still awaiting impacts & traffic consequences from Henley Gate and IGS developments which are creating 'Rat Runs' through the East Suffolk villages from Westerfield-Tuddenham-Bealings and Playford-Culpho-Grundisburgh and Rushmere

SOCS agree with SCC Councillor Martin's objection;

'Nature of Submission: Inform the Authority that you object to the Planning Application As County Councillor for the Rushmere Division of Ipswich, I would like to object to this application on the following grounds:

1. Full Planning Permission is being sought for access arrangements. Full permission should not be given for access to the site when there are no clear plans of the exact access provisions proposed. At the very least there needs to be clear plans for the exact layout of the provisions which are only broadly suggested in the documents.

2. The sole vehicular access for the vast majority of the site is onto Humber Doucy Lane at the junction with Inverness Road. Such a junction must provide (or be provided in conjunction with):

a. Traffic calming measures north of the junction to slow southbound vehicles prior to their turning the blind corner onto the junction

b. Measures to prevent vehicles from the new development using Inverness Road as a cut-through

c. Safe access for pedestrians, including wheelchair users, and cyclists from the development onto Inverness Road and onto the South West side of Humber Doucy Lane

d. An upgrade of the footway on the South West side of Humber Doucy Lane between Inverness Road and Sidegate Lane, to allow for pedestrians, wheelchairs and 2-way cycling (especially important for children going to school)

3. All traffic to and from the development- with the exception of the small parcel off Tuddenham Rd, - will use Humber Doucy Lane. HDL is currently too narrow to be safe, has no physical speed restrictions and currently experiences regular speeding and heavy through-traffic, especially during rush-hour, avoiding safer more suitable roads. Traffic calming needs to be introduced at strategic locations along the whole of HDL to slow traffic down and reduce the propensity to rat-run.

4. The section of HDL between Inverness Rd and Sidegate Lane has a series of concealed or partly-concealed exits on the south side, as a result of the very mature Oak trees (which are quite possibly 200 years old and helped give HDL its name?). The only safe way to increase the level of traffic on this section of HDL would be:

a. To introduce a clear strip of say 2 metres on the north/east side of the trees, to enable visibility to vehicles entering and exiting the bungalows

b. To EITHER replace the 2m of road surface lost, by widening it to the north (thus removing the hedgerow) OR to make the existing narrowed HDL northbound only and introduce a southbound-only lane on the other side of the hedgerow

5. The three main routes to the development from Colchester Rd (and thus from almost every destination) will be

a. Up to Tuddenham Rd and then down to Colchester Rd

b. Along Sidegate Lane and Sidegate Lane West

c. Down to Rushmere Rd and then either along to Colchester Rd or through Rushmere Village or down the narrowest part of HDL to [Playford Rd](#).

*[5a\) Tuddenham Rd](#) is relatively broad between Colchester Rd and the Woodbridge Branch Railway Line. (Hump Backed Bridge) This induces speeding traffic. Enforcement of speed limits in this location is virtually non-existent. The visibility on either side of **both railway bridges is very poor.***

There are no pedestrian footways on various parts of this road. Speed reduction measures will be needed on both sides of both rail bridges (not just an extension of the 30mph limit, but physical measures to ensure that the limit is respected). The junction from HDL to Tuddenham Rd will need to be upgraded, preferably signalised. The junction from the small parcel of development directly onto Tuddenham Rd is inherently unsafe, as it is far too close to the blind bridge. In addition, pedestrian footways need to be continuous on both sides of Tuddenham Rd from the Woodbridge Branch bridge to [Colchester Rd.5b\) Sidegate Lane](#) carries very heavy pedestrian and cycle access to Northgate School. Traffic calming measures will be essential, especially on Sidegate Lane West. The current slip road from Colchester Road onto Sidegate Lane West should be closed, leaving the only access being the main part of SLW outside the Co-op - this should be left-in-left-out in order to make the junction with Colchester Rd safer and to deter through traffic. In addition there should be built-up Zebra crossings on BOTH sides of the Northgate school entrance, and the whole of Sidegate Lane West should be a mandatory 20mph.

SCC Highways

1. It would place very significant traffic loading onto Humber Doucy Lane and nearby roads, which are far more limited in capacity compared to other developments, like Ravenswood – which has good connectivity to the A1189, A14, Felixstowe Rd, Nacton Rd (see images on page 2). I don't have confidence that this application has properly modelled the traffic impact and that it will not lead to significant problems.
2. If a similar methodology was used for the design of Ravenswood, then the widely reported traffic issues at that site would suggest that this type of traffic modelling is flawed. See: <https://www.ipswichstar.co.uk/news/23209032.ipswich-calls-solution-prevent-ravenswood-traffic-chaos/>
3. There is poor pedestrian access from Humber Doucy Ln onto and along Tuddenham Rd. The separate access point onto Tuddenham Rd is unsafe, as Tuddenham Rd has no pavements or street lighting.
4. A vehicular access point is shown at the north-west corner of the site, less than 80m from the railway bridge. Have Highways approved an access route this close to the bridge?
5. This area is a know accident blackspot which includes the narrowing of highway on rail bridge.

13.2. Further work is required to ensure the impact of the development on the wider transport network is fully understood and appropriately mitigated.

'it must also be demonstrated that sustainable transport is at the forefront of the design and that pedestrian and cycle movements are prioritised. Tthe proposals currently prioritise motor traffic, contrary to the User Hierarchy outlined within the Manual for Streets (MfS) and paragraph 112 (a) of the NPPF 2021.13.3.'

Below left – the junction from Humber Doucy Ln to Tuddenham Rd. Below right – likely congestion areas (red) and existing school congestion (black):



Images: Google Earth, Landsat/Copernicus, Google Maps

The only other routes away from Humber Doucy Ln are Sidegate Lane (which has pedestrian/vehicle congestion at peak hours from the nearby Rushmere and Northgate schools – students having to walk in the road, etc) or the existing Rushmere estate (Renfrew Rd, Selkirk Rd, etc) which has narrow residential streets and is also congested at peak hours with school related traffic. There is a constraint opposite Westerfield House: road only 4.5 metres wide, with no road widening possibility. **Westerfield House needs to have its travel plan sign off we believe.**

For 660 homes, there will likely be over 1200 cars. Some cars will make multiple movements/journeys per day. How is this level of traffic going to be accommodated? SOCS have no confidence in the traffic modelling used for this planning application. The traffic jams at Ravenswood suggest the modelling used for these large developments is flawed. The proposed traffic light arrangement for access on and off the site on the western

bend of Humber Doucy Ln will further limit traffic throughput. SOCS believe this will cumulatively cause significant problems, especially at peak hours. Vehicle congestion is a known source of harmful pollution which the local authority has legal requirements to prevent.

SCC Highways-SOCS Concur with B. Samuel On behalf of the Northern Fringe Protection

We also note the requirements in paragraphs 166-168 (extracts below) in relation to off-site highway infrastructure and sustainable travel and that substantial contributions from the developers will be required to deliver junction and accessibility improvements. The current consultation fails to adequately address the off-site infrastructure requirements, most notably in relation to travel. Developers will need to demonstrate that they can deliver at least 15% modal shift to comply with the Local Plan. We also note that the two road bridges on Tuddenham Road, either side of Humber Doucy Lane will require major improvements to allow pedestrians and cyclists to travel safely along Tuddenham Road from the new homes.

166. Access to the site would be taken from Tuddenham Road and HDL [Humber Doucy Lane], both of which currently operate with two-way traffic. But given the location of the site on the edge of Ipswich, around 3.5 km from the town centre, accessibility improvements will be required. Whilst there are opportunities to improve the junction of HDL and Tuddenham Road and the width of HDL on land within the site, the Highway Authority acknowledges that the options to significantly increase traffic capacity are limited by space constraints.

167. Therefore, the transport and access strategy for the site, relies on good quality walking, cycling and bus routes to the town centre and local services and facilities, plus other sustainable transport measures to manage travel demand, encourage modal shift and contain road traffic growth.

168. Currently, Policy ISPA4 identifies the need for transport network improvements, but not demand management measures to mitigate impacts. Accordingly, MM17 includes wording to this effect in the policy, with reference to the ISPA Transport Mitigation Strategy. MM18 and MM22 make consequential amendments to the supporting text, including the need for financial contributions towards sustainable transport measures.

The formal planning application will obviously require a full Transport Assessment based on real traffic survey data during school term time when all years are in full-time education and not during GCSE/A Level exam time. This should include the cumulative effects of all known developments and the full build out of the Ipswich Garden Suburb, which due to the school phasing requirement should have been largely completed before the HDL site can be progressed. We welcome references to providing a safe pedestrian network that can connect to the existing public rights of ways and provides alternative “slow” movement through car-free green links but this appears to relate to the site itself. The Vision currently fails to include sufficient commitment to off-site sustainable travel .

The Inspectors also required changes to the Local Plan to ensure the timely delivery of appropriate infrastructure whilst Paragraph 153 states “The A1214 junction mitigation related to the IGS development is considered likely to be delivered in 2027 or 2028, thereby alleviating the congestion issues at these locations at the earliest opportunity during the Plan period.” Without these A1214 junction improvements, the local road network will be unable to cope with traffic from the HDL site. Until such improvements are in place, bringing forward the HDL site is clearly premature, which the consultation fails to recognise.

Group

SOCS have grave concerns over Foul Waste disposal - (Anglian Water) - The application is silent on any details and developer does not even reference this in it's official application form.

SOCS suggest this is a breach of validation process.

1. The public are not party to negotiations but SOCS have grave concerns that sewer issues for foul disposal must be ‘front loaded’ to meet Anglian Water’s 5 year business cycle.

2. The only existing sewer infrastructure is combined surface water and foul, there are pinch points and capacity issues, (Warwick Road) eg and likely pressures from extreme weather events and climate change en route to to Cliff Key.
3. The land topography and SUDS are directed to the Fynn Valley via ponds /Swales. The land here is problematic impermeable clay.
4. The proposed SUDS and Surface Water drainage route is likely to have an adverse impact (overwhelming/flooding) on Lacy and Allen Farms plus The Barn, who are all on non mains drainage and small Treatment Works, as are many others existing properties on this land area.
5. In 2012 it was suggested that the receiving environment for sewerage might be Donkey works Treatment plant Tuddenham, but this was ruled out by the environment agency as a threat to the Fynn.
6. Also the works are very small there (with restricted limited capacity as it also serves Withesham, and there is an AW Lorry access problem impacting on this residential lane in the village.

<https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality#drainage-strategies> **'Are there particular considerations that apply in areas with inadequate wastewater infrastructure?**

'The preparation of plans should be the focus for ensuring that investment plans of water and sewerage companies align with development needs. If there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants can be asked to provide information about how the proposed development will be drained and wastewater dealt with. Applications for developments relying on anything other than connection to a public sewage treatment plant will need to be supported by sufficient information to understand the potential implications for the water environment.

When drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This will need to be done in consultation with the sewerage company of the area.

The timescales for works to be carried out by the sewerage company do not always fit with development needs. In such cases, local planning authorities will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to the public sewage system have been carried out. Read [further information on conditions](#).'

Information specified on the Local Validation List.

<https://www.ipswich.gov.uk/localvalidationlist>

<https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

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2.35. Foul Drainage Assessment

2.35.1. A Foul Drainage Assessment is required for all development that proposes/requires the disposal of additional foul sewage effluent.

This includes;

- all schemes proposing additional new build units or uses requiring toilet facilities or other foul water disposal(e.g. new dwellings, offices, community buildings, restaurants, car washes etc),
- conversions of existing buildings that were unlikely to have an existing or previous foul water connection (e.g. barns and other storage buildings) to a use requiring a foul water connection,
- significant extensions to existing buildings and/or uses requiring additional foul water facilities (excluding extensions to existing dwellings).

2.35.2. This is required because all development is expected to ensure that the capacity of local wastewater treatment and sewerage infrastructure is not exceeded.

2.35.3. If an application proposes to connect a development to the existing drainage system, then details of the existing system should be shown on the application drawing(s). In the case of extensions to existing dwellings this can simply be in the form of annotation on the block and/or floor plans showing the connection to the existing sewage pipe within the property.

2.35.4. On applications creating additional units (e.g. new dwellings, offices, community facilities etc including conversions), the Foul Drainage Assessment should detail how the foul sewage will be connected to the public sewer.

2.35.5. Where a development involves the disposal of trade waste or the disposal of foul sewage effluent other than to the public sewer (i.e. if it is to be treated via an onsite unit), then a more detailed Foul Drainage Assessment will be required including details of the method of storage, treatment and disposal. A Foul Drainage Assessment should include a full assessment of the site, its location and suitability for storing, transporting and treating sewage.

2.35.6. Where connection to the mains sewer is not practical, then the Foul Drainage Assessment will be required to demonstrate why the development cannot connect to the public mains sewer system and show that the alternative means of disposal are satisfactory. A private means of foul effluent disposal is only acceptable, and should only be considered, when foul mains drainage is unavailable.

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<https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

- **Environment Agency?**
- **SCC Flood and Surface Water Management ?**

SOCS seek reassurance on these matters from Borough and comment from them following the required information being provided by developer before determination.

SOCS will contact SCC and IBC Public Health & Environmental Protection (particularly about health & Air Quality Issues likely to result from the above identified problems)

Air Quality Assessment Large scale developments will require an Air Quality Assessment These proposals will cause further impacts to air quality and exacerbate air pollution.

Westerfield/ (Tuddenham Parish Councils) concerns and comment on Transport and SCC Highways inadequate oversight and survey along Church Lane, Westerfield Lane (an SCC Quiet lane...!) and Lower Road

Nature of Submission: Inform the Authority that you object to the Planning Application operate within capacity following the build out of the development or whether measures are required to mitigate the impact

Health Impact Assessments Suffolk and North East Essex ICB

- and likely contributions will possibly amount to about £650,000

Healthcare Position Proximate to the Planning Application Site

The proposed development is likely to have an impact on the services of Two Rivers and Felixstowe Road and the proposed new GP practice on the site of Took's bakery. Took's is not underway yet.

Previous developments in the area have already had S106 agreed for the purpose of supporting the new GP practice, but this one does not.

In addition to a primary healthcare response, the proposed development is likely to have an impact on other health and social care system providers that have been consulted as part of this East Suffolk & North East Essex Foundation Trust • Norfolk & Suffolk Foundation Trust (Mental Health) • East of England Ambulance Service NHS Trust

The proposed development will be likely to have an impact on the NHS funding programme for the delivery of healthcare provision within this area and specifically within the health catchment of the development.

*** FOI request to Suffolk & N E Essex Alliance 2021 by SOCS**

New FOI regarding current situation: more accurate data on GP Availability and current patient load show that the situation is far worse than indicated within the Mersey Red House Park Application and Health Impact Assessment, where it is conceded that local GPs are beyond recommended patient load and the problem is escalating.

2023 figures with 2024 Figures to follow with implications of the impact of finding pressures experienced 2025-2025 by the ICS

Practice (data as at 31 Dec 2021)	Practice list size	Patients per GP - FTE		Patients per GP		HIA Kevin Coleman	
		This includes trainee GPs and Locums	Patients per GP - FTE	FTE	Patients per GP - FTE	GP FTE	Patient numbers
			Includes trainee GPs & Locum	excluding Trainee & Locum	excluding Trainee & Locum		
BARRACK LANE MEDICAL C	19890	1437.14	13	2673.39	7.45	7	19435
BURLINGTON ROAD SURGB	17453	2164.81	8	3438.7	5.07	5	16733
IVRY STREET MEDICAL PRA	12426	1505.09	8.25	1728.39	7.21	9	12209
ORCHARD MEDICAL PRACT	14217	1563.51	9.09 (12)	2042.77	6.9	9	14460
TWO RIVERS MEDICAL CEN	28074	1831.36	15.32	2639.46	10.63	15	26378
Totals	92060	8501.91	44.57	12522.71	37.26	45	89215
			2065.5 pts each		2470 pts each	1982 pt each	

SOCS HIA Analysis required under Validation checklist

SOCS have looked at the figures and have assessed the data. This HDL will result in approx 2000 additional residents. There are further pressures evident on experienced GPs. Surgeries can only cope with trainees and Locums.

It would appear that further development pressures from BT Martlesham will impact on already stretch to capacity health services.

HIA reports acknowledged the pressure with GPs, assuming 'full time GPs' (FTE) having too big a case load (1982 patients averaged when recommended figure is 1800) However, the current figure is 2065.5, is way over! And includes trainees and locums.

If they are excluded, (i.e. inexperienced and part time) the figure for experienced FTE GPs is 2470 patients per GP. That is 30% more than recommendations!!!!

This leaves too much capacity for things to go wrong in our view! GP services, dentists etc are at crisis point.

ICB statement 2023- (Red House0) As the commissioner of primary care services, Suffolk and North East Essex ICB would therefore expect these impacts to be fully assessed and mitigated.

4.0 Assessment of Development Impact on Existing Healthcare Provision

4.1 The existing GP practices do not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 2,346 residents and subsequently increase demand upon existing constrained services.

4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.'

- **SCC Drainage & Flood** (to be confirmed) Especially in relation to flooding and impacts on existing non mains drainage systems.

Special Needs Education – currently in crisis failed OFSTED and CQC

This means the Council will seek a contribution of £611,757.52 for the provision of SEND facilities

Landscape Character

This proposal partly falls within East Suffolk and borders the Fynn Valley and a number of historic buildings.

'Landscape Character' in the Suffolk Coastal Local Plan 2020 –

"10.31 The Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018) analyse the sensitivity of settlement fringes, their capacity to accommodate future development and priorities for the enhancement, protection, management and conservation of these landscape areas."

The image on the next page shows the close proximity of this development to Lacy's Farm, Allen's Farm and the Fynn Valley. And the highly detrimental effect on their amenity and adverse effect on their historic importance as well as Fynn Valley.

Lacy and Allen farmers plus other properties are currently in non Mains foul drainage



- **Agricultural Land Assessment and importance**

No account of the of this special high grade 2 and 3, for food production.

We have a food security crisis looming. The Govcerment needs a wake up call and to prevent speculative and mis timed development pressures on hard pressed Local Authority Planning departments.

Dec 2023 LURA and emphasis on brownfield sites not '**Best and Most versatile land**'

