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date 8<sup>th</sup> February 2024



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By email:- Kevin Coleman

Dear Mr Coleman,

**TOWN AND COUNTRY PLANNING ACT 1990  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990**

**Site Address: Land off Humber Doucy Lane**

**Proposal: Outline Planning Application for up to 600 dwellings and non-commercial uses including new vehicular access points on to Humber Doucy Lane and Tuddenham Road, drainage, landscaping and provision of public open space.**

I write in relation to the above proposal for which a series of pre-application meetings have been held to discuss matters – meetings were held 20<sup>th</sup> July, 15<sup>th</sup> September, 19<sup>th</sup> October (site visit), 1<sup>st</sup> November, 2<sup>nd</sup> November, 29<sup>th</sup> November and 8<sup>th</sup> December 2023. The purpose of this letter is to provide an overview of the matters discussed and highlight where further work and / or information is required. The content of this letter has been discussed with East Suffolk Council (ESC) and can be taken as joint advice from both ESC and Ipswich Borough Council (IBC) Planning Officers.

The matters raised in this letter reflect the discussions held between parties to date and identify the further areas of work which will need to be considered in order to progress the planning process. Whilst there is still a lot of detail and technical information which has not been reviewed or commented upon yet, we felt it important to get our current position over to you in writing so there is clarification on where we presently stand following the first round of discussions held on the site.

It is understood that there is an intention to submit a planning application at the end of February 2024. An EIA screening has been received and is currently being considered (Ref. 2024/0005) and an opinion is due to be issued by 16th February 2024. As previously advised and I think evident from the content of this letter, there are a number of matters which remain unresolved and we feel would be appropriate to address and work through prior to an application being submitted.

## **1. Background**

The proposals relate to a site which has been allocated in both the IBC and ESC Local Plans for a combined total of 600 dwellings under policies ISPA4 and SCLP12.24 respectively.

The land allocation consists of 5 parcels. All but one of the parcels (land opposite Westerfield House, Humber Doucy Lane) form the site to which this pre-application advice relates. The main focus of discussion to date has been the three main parcels which sit to the north side of Humber Doucy Lane. The remaining parcel which is on the junction between Humber Doucy Lane and Tuddenham Lane, is understood to be in the same ownership but no proposals for this land have been discussed in any detail to date.

## **2. Planning Policy and Guidance**

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

### **National Planning Policy**

**National Planning Policy Framework (2023)**

**National Planning Practice Guidance**

**National Design Guidance**

### **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 SCLP2.1: Growth in the Ipswich Strategic Planning Area

Policy SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats

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 SCLP8.1 - Community Facilities and Assets

Policy SCLP8.2 - Open Space

Policy SCLP8.3 - Allotments

Policy SCLP8.4 - Digital Infrastructure

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 SCLP10.5 - Settlement Coalescence

Policy SCLP11.1 - Design Quality

Policy SCLP11.2 - Residential Amenity

Policy SCLP11.3 - Historic Environment

Policy SCLP11.4 - Listed Buildings

Policy SCLP11.5 - Conservation Areas

Policy SCLP11.6 - Non-Designated Heritage Assets

Policy SCLP11.7 - Archaeology

Policy SCLP12.1 - Neighbourhood Plans

Policy SCLP12.18 - Strategy for Communities surrounding Ipswich

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**

The development proposals should make provision for a significant reinforcement of existing planting and additional native tree planting of local provenance along the north-eastern / eastern boundary of the site adjoining Tuddenham Lane and in the vicinity of existing residential properties off Tuddenham Lane. In particular, the planting scheme should be designed on the premise of maintaining the separation of the enlarged urban area of Ipswich with the rural and tranquil nature of this part of the Neighbourhood Area and proposals should be accompanied by a management plan which will ensure the successful establishment of the new planting and its continued growth through to maturity. Any access onto Tuddenham Lane and Seven Cottages Lane shall only be for pedestrian and/or cycle access.

##### **Policy RSA 3 – Protection of Landscape Character and Important Views**

As appropriate to their scale, nature and location and to ensure that they conserve the essential landscape, heritage and rural character of the parish, development proposals should demonstrate how they:

- i. have regard to, and conserve, or enhance, the landscape character and the setting of the parish, as referenced in the Rushmere Landscape Appraisal; and
- ii. will ensure that there is no unacceptable impact on the key features of the important views identified on the Policies Map.

#### **Policy RSA 4 – Protection of Trees, Hedgerows and other Natural Features**

Development proposals should avoid the loss of, or substantial harm to, distinctive trees, hedgerows and other natural features such as ponds and watercourses. Where such losses or harm are unavoidable:

- i. the benefits of the development proposal must be demonstrated to clearly outweigh any impacts; and
- ii. suitable mitigation measures, that provide better replacement of the lost features will be required to achieve measurable biodiversity net gain.

Any such mitigation measures should form an integral part of the design concept. In addition, the layout and design of the development proposal concerned should be landscape-led and appropriate in relation to its setting and context and have regard to its ongoing management.

Where new access is created, or an existing access is widened, through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.

#### **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)**

#### **ISPA 4 (Cross Boundary Working to deliver Sites);**

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

Requirements of ISPA4.1 (summary):

- a. High quality design including at least 30% affordable housing,
- b. Maintenance of separation between Ipswich and surrounding settlements through effective use of green infrastructure,
- c. Preservation/enhancement of the setting of Listed buildings and other heritage assets (Heritage Impact Assessment required),
- d. Site specific Flood Risk Assessment,
- e. Retention of existing protected trees,
- f. Meet infrastructure requirements (primary school; early years setting; replacement of lost sports facilities; Habitats Regulations Assessment; enhancement of strategic green infrastructure and 10% BNG; transport measures including improvements and mitigations; phasing in accordance with delivery of IGS in particular Red House Primary School provision; provision of convenience retail; and healthcare contributions.)

**CS1 (Sustainable Development)** relating to the tackling of climate change and consideration of its implications. Both Mitigation (reduction of carbon emissions related to the development) and Adaptation (building in resilience to the impacts of climate change) need to be considered. Sustainable building practices and cleaner energy provision will need to be included in the development;

**CS2 (The Location and Nature of Development)** as an allocated site, the principle of the proposal is sound, but it will need to demonstrate that the allocation requirements under ISPA4.1 are met;

**CS4 (Protecting our Assets)** The proximity of listed buildings and the location on the edge of the countryside mean consideration of the appearance and character of the area are crucial, as well as the greenfield and previous agricultural nature of the site mean that the value of soils will need to be considered;

**CS5 (Improving Accessibility);** the development will need to minimise the need to travel and enable access by foot, bicycle and public transport as well as encourage expansion of electronic communications and promote inclusive and age-friendly design;

**CS7 (The Amount of New Housing Required)** the development as an allocated site should meet the housing requirement minimum identified within the Housing Land Supply and Housing Trajectory – identified as 499 dwellings for Humber Doucy Lane by 2036 (the proposal appears to exceed this);

**CS8 (Housing Type and Tenure)** The development will be expected to provide a mix of dwelling tenure, types and sizes, including self build or custom build;

**CS12 (Affordable Housing)** The development is exempt from the 15% affordable housing requirement of CS12, but is nevertheless required to provide 30% of affordable housing as per ISPA4.1.;

**CS13 (Planning for Jobs Growth)** the Development will be required to meet its site allocation requirements for employment generating land uses, in this case consideration should be given to the opportunity to provide convenience retail facilities on site to serve new and existing residents;

**CS14 (Retail Development and Main Town Centre Uses)** in the case of the development, any retail uses would need to be at a local level only and should not compete with the Town Centre retail function;

**CS15 (Education Provision)** the need for Primary School and Early Years provision needs to be addressed by the application, either on site or through appropriate coordination and phasing with the future planned provision of facilities at the Ipswich Garden Suburb.

**CS16 (Green Infrastructure, Sport and Recreation)** The development may need to provide replacement sports facilities 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. The site is also bordered to the west by green corridor 'D' identified in Plan 6;

**CS17 (Delivering Infrastructure)** The proposal will need to demonstrate that the on and off-site infrastructure requirements needed to support the development can be met and impacts on communities and the environment can be mitigated;

**Policies DM1 (Sustainable Design and Construction)** The proposed development will need to achieve A 19% improvement in the reduction of CO2 emissions above the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L) and water

efficiency standards of 110 litres/person/day as set out in Requirement G2, Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended. It is noted that the most recent version of Part L came into effect on the 15 June 2022, and that new homes are now assessed under the SAP10 calculation procedure, but compliance meeting or exceeding emissions reduction and water efficiency will need to be demonstrated;

**DM2 (Decentralised Renewable or Low Carbon Energy)** The development will need to provide at least 15% of its energy requirements from decentralised and renewable or low-carbon sources. Reduced provision will be unlikely to be considered as the supply and cost of renewable energy has substantially improved since DM2 was written;

**DM3 (Air Quality)** the application site is not located in an Air Quality Management Area, but due to size and sensitivity of intended use an Air Quality Assessment and a Construction Management Plan including assessment of dust and emission impact from construction will be required;

**DM4 (Development and Flood Risk)** the application site is in flood zone 1 (meaning lowest risk from flooding impacts from rivers and the ocean), but does still have some potential likely impacts possible from surface water flooding, which may be exacerbated by the creation of hard surfaces, and will therefore require a site specific Flood Risk Assessment (FRA) and the appropriate application of Sustainable Drainage and water management;

**DM5 (Protection of Open Spaces, Sports and Recreation Facilities) and DM6 (Provision of New Open Spaces, Sports and Recreation Facilities)** these policies apply as the development site could involve the loss of existing sporting facilities (if the Rugby Club is included in development) and require provision of sporting and recreation facilities for residents or appropriate contributions;

**DM7 (Provision of Private Outdoor Amenity Space in New and Existing Developments)** the development will need to meet the private outdoor amenity space standards outlined in Policy DM7;

**DM8 (The Natural Environment)** It is noted that the eastern portion of the site has been identified in the Wildlife Audit as a potential development site with wildlife interest rank 1-4, flagging it as potentially sensitive to development. Any planning application must be supported by an Ecological Impact Assessment (EclA) undertaken by a suitably qualified ecologist following published best practice guidelines. The EclA must assess all likely impacts on ecological receptors and identify all necessary avoidance, mitigation or compensation measures to address impacts. The EclA must also include details of appropriate ecological enhancements to be incorporated into the development, in addition to measures to be provided to meet the mandatory Biodiversity Net Gain (BNG) requirement. The development proposal must incorporate measures to deliver a minimum of 10% net gain for biodiversity. Therefore, evidence of biodiversity net gain using the statutory biodiversity metric must be submitted to meet the requirements under the Environment Act (2021), this should include a completed Statutory biodiversity metric and draft Biodiversity Gain plan. A project level Habitats Regulations Assessment will be required, information to inform a Habitats Regulations Assessment must be submitted with any planning application. Such information should include details of how measures to address impacts arising from increased recreational disturbance will be delivered as part of the development. The site is located within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy Area and so financial contributions will be secured in relation to the avoidance and mitigation of impacts of increased recreation, to contribute towards the provision of strategic mitigation as established through the Recreational Disturbance Avoidance and Mitigation Strategy. **The site straddles the two RAMS contribution rate zones and therefore careful**

consideration of how to apply the total mitigation contribution across dwelling numbers will be necessary [Recreational Disturbance Avoidance and Mitigation Strategy \(RAMS\) \(arcgis.com\)](#).

**DM9 (Protection of Trees and Hedgerows)** The development site contains protected trees which must not be removed or harmed. In addition, the loss of any non-protected trees or hedgerows should be minimised and will need to follow a plan for replacement planting on a two for one basis or better and using semi-mature specimens. New planting within landscaping scheme will be encouraged;

**DM10 (Green and Blue Corridors)** The site is located on the eastern side of identified green corridor D. Development within the green and blue corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions. The Council will seek to establish attractive green links and to provide for public access wherever safe and practicable. Opportunities will be sought to link existing green and blue corridors into a more continuous network through the layout of new development, the provision of new open spaces or public realm improvement. Development proposals which break or disrupt an existing corridor without being able to form an acceptable and useable alternative route in the network will be refused;

**DM12 (Design and Character) and DM13 (Built Heritage and Conservation);** The application site is within the North East Character Area of the Ipswich Urban Characterisation Study SPD (within the Rural Edge Character Sub Area) describing the area around the site as an area with open countryside views across fields to the east. The proposed development will need careful consideration to ensure that the development design, layout and massing does not result in harm to various listed buildings in close proximity. Design principles in DM12 will need to be carefully adhered to both at outline stage and in the eventual detailed design, and sensitive integration will be required between the settlement footprint and the rural edge of Ipswich;

**DM14 (Archaeology)** The development site is within an area of Ipswich where detailed Archeological investigation has not taken place and so an Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geo-physical survey and an appropriate level of trial trenched archaeological evaluation (see character zone 2c in the Archaeology and Development SPD), in consultation with Suffolk County Archaeology;

**Policy DM18 (Amenity)** Amenity considerations for occupiers and neighbours of the development relating to sunlight and daylight, noise vibration, odour contamination, visual privacy, overlooking and overbearing will need to be considered in the design of the development;

**DM21 (Transport and Access in New Developments)** A Transport Assessment is required for the proposed development to ensure that it will have an acceptable impact on and relationship to existing transport infrastructure. The Council will need to be satisfied that impacts can be managed in a satisfactory way, sustainable modes have been prioritised and that suitable additional infrastructure provision is made where necessary;

**DM22 (Car and Cycle Parking in New Development)** Minimum standards for the provision of car parking and cycle storage will be required to be adhered to (Suffolk Guidance for Parking fourth edition 2023);

**DM23 (The Density of Residential Development)** The development site is in an area where low-density development of at least 35dph will be required;

**DM30 (District and Local Centres)** this policy sets out what will be supported within and in within set distances of defined centres;

**DM32 (Retail proposals outside defined centres)** this policy sets out the requirements for allowing retail proposals outside defined centres;

and

**Policy DM34 (Delivery and Expansion of Digital Communications Networks)** On sites of more than 10 new residential units and on other non-residential development, proposals must allow for the provision of the infrastructure for the most up to date digital communications technology in order to allow connection to that Network. This infrastructure should be provided on an open access basis that will allow for the future provision of 'ultrafast broadband', 'full fibre' solutions or any other technology as and when they are made available. b) Proposals for the expansion of electronic communications networks, including next generation mobile technology (such as 5G) will be supported, where they preserve the historic environment and do not harm the appearance of the street scene.

### **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 Coastal Landscape Character Assessment (2018)**

**Settlement Sensitivity Assessment (2018)**

**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**

**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)**

**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)**

### **3. Principle of development**

In accordance with planning policy the development for this planning allocation will need to be planned and comprehensively delivered through master planning of the site across the two council areas (IBC and ESDC). Further advice in relation to the factors which should influence the site are set out in the relevant site allocation policy and will be considered in the assessment of the masterplan proposed for the site. This has informed discussion on the masterplan proposals which have been tabled to date.



Whilst discussion on the principles of the masterplan have progressed positively there remains a number of outstanding issues which need to be resolved and agreed before moving to the next stage of pre-application discussion. Priority for these issues is the positioning and strategy for the vehicular access points and connections into and across the site. This needs to be resolved whilst maintaining an agreed landscape led approach to the masterplanning of the site and therefore this interim response does not guide in detail or conclude on those matters.

#### **4. Vehicular Accesses and connections – IGS site.**

Turning to the matter of vehicular accesses and connections to and within the site, this has been discussed in more detail during the course of our pre-application meetings. Various options have been considered and in summary we have advised on a number of points which should be incorporated into the final consideration of the masterplan for the site.

- It is recognised that the main highway junction (likely to be signalised) will be required on Humber Doucy Lane. The impact of this on the character of Humber Doucy Lane should be minimised as far as possible.
- The location of the main highway junction opposite Sidegate Lane is the preferred option, given the scale of the junction required.
- In the interests of minimising the impacts on Humber Doucy Lane, flexibility is available to providing another access into the site from Tuddenham Road in order to avoid having more than one vehicular access from Humber Doucy Lane into the main phase of the site.
- For the smaller phase of the site to the east of the site allocation we discussed the best position for this access in terms of safety and in the interests of maintaining as much existing hedgerow as possible, it was considered appropriate for the access to be located on the inside curve of the Humber Doucy Lane.

A key aspect of the above advice is the importance of the main highway access being located opposite Sidegate Lane as opposed to being opposite Inverness Road which is further west along Humber Doucy Lane. We understand from the discussion held to date that the preferred option will require some land from the adjoining Rugby Club ownership.

Whilst it is understood that the different land ownerships and uses is challenging, we are of the view that for the best planning outcome for your site, it is imperative that there is joined up work between this site and the adjoining rugby club site, not least because of the benefits and more acceptable development which can be achieved for the main highway junction from HDL into the site. The options for bringing forward this highway proposal need to be fully investigated with the relevant parties. Both Councils expect to see full east west pedestrian and cycle connectivity throughout the site immediately behind the Humber Doucy Lane hedgerow. This will require additional Rugby Club land.

#### **5. Other matters**

Drainage concern has been raised with regards to the large-scale drainage solutions which are being proposed and it is advised that more at source drainage solutions should be incorporated to ensure these can be minimised as far as possible.

It is understood that part of the site will involve land previously used by the neighbouring rugby club. Your attention is therefore drawn to national and local plan policies related to the loss of any sport facilities and the mitigation expected. An Open Space Assessment will be required to identify the quantity and quality of the existing provision affected and the proposals to compensate for any loss of sports facilities (including open space and recreational facilities).

SCC developer contributions advice is attached. You will note the reference to the assumption of the development using the Ipswich Garden Suburb schools. This is contrary to the assumptions made to date within the TA information on primary destinations and does need to be resolved with SCC.

Given the multi developer approach and parcelled nature of some of the site, we would expect to achieve a design code prior to Reserved Matters consideration.

Given the District and Borough boundary, the masterplan will need to recognise this and whilst avoiding it being an excessively artificial feature, homes and streets should be clearly laid out one side or the other as this will avoid future problems with street naming and number and other municipal and electoral matters.

## **6. Validation requirements adopted February 2023**

Full details of the requirements are set out in the Councils' Validation list. The following are the main documents and plans required:-

- Application forms, with appropriate certificates signed
- The relevant planning fee
- Site location plan 1:1250 or larger
- Planning Statement
- Design and Access Statement
- Masterplan
- Landscape Strategy
- Parameter Plans
  - Constraints Plan
  - Green and Blue Infrastructure Parameter Plan
  - Access and Movement Parameter Plan
  - Land Use Parameter Plan
  - Character Areas Parameter Plan
  - Density Parameter Plan
  - Heights Parameter Plan
- Air quality assessment
- Biodiversity Gain Plan – need to agree biodiversity baseline, Sanga provision
- Community Consultation Exercise Statement
- Lighting assessment
- Open space provision – breakdown of type, location and quantity proposed
- Open Space Assessment
- Heritage impact assessment
- Archaeology Assessment
- Affordable Housing Statement & Delivery Plan
- Viability Appraisal
- Site Waste Management Statement
- Transport Assessment
- Sustainable Drainage Strategy
- Sustainability Statement
- Health Impact Assessment
- Noise and Vibration Assessment
- Landscape and Visual Impact Assessment
- Statement of Crime Prevention
- Retail Impact Assessment
- Arboricultural Impact Assessment
- Ecological Impact Assessment (EclA)

- Information to inform a Habitats Regulations Assessment
- Statutory Biodiversity Net Gain Metric and draft Biodiversity Gain Plan

I trust this information proves useful for you and I thank you for engaging with the local planning authority in relation to this important site. You will be aware that the above comments are based on the plans provided and represent officer level opinion only, which is made without prejudice to any future decision the Council might make on this or a related application.

Yours sincerely

A black rectangular box redacting the signature of James Mann.

James Mann MRTPI  
Head of Planning and Development