

Town and Country Planning Act 1990

Appeal by Barratt David Wilson and Hopkins Homes concerning land north-east of Humber Doucy Lane, Ipswich. Appeal against Ipswich Borough Council's and East Suffolk Council's refusal of – Hybrid Planning 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

**LPA references: IP/24/00172/OUTFL and DC/24/0771/OUT
PINS reference: APP/X3540/W/24/3350673 (Lead Case) and
APP/R3515/W/24/3350674**

Statement of Case by Suffolk County Council

11th November 2024

1. Introduction

- 1.1. This Statement of Case (SoC) sets out the position of Suffolk County Council (SCC) in relation to its statutory functions in respect of highways, education, early years, surface water drainage, archaeology, waste, and libraries in regard to the proposed development at Land north-east of Humber Doucy Lane, Ipswich.
- 1.2. Because of the significant issues arising that fall to SCC, a request was made to PINS to be granted Rule 6(6) party status. This was granted on 07 October 2024. The significant issues which arise are in respect of highways mitigation, surface water, and archaeological issues, areas for which SCC have statutory responsibility. In addition, there are significant infrastructure implications for early years, education provision (primary, secondary, sixth and SEND), libraries, and waste.
- 1.3. The application is a cross-boundary application with the application site being located within the areas of both Ipswich Borough Council (IBC) and East Suffolk Council (ESC). Rather than one Local Planning Authority taking the lead in determining the cross-border proposal, both IBC and ESC separately determined identical planning applications. IBC and ESC validated both applications on 05 March 2024. SCC was consulted, and responded to, both applications, as detailed in section 3 below.
- 1.4. Permission was refused by both IBC and ESC on 2nd June 2024. IBC's decision set out 13 reasons for refusal. ESC's decision contained 11 reasons for refusal. These are summarised in Section 4 below. SCC is particularly concerned with 5 of those reasons for refusal, being the reasons for refusal particularly concerned with highways, flooding and drainage, archaeology, and development contributions.
- 1.5. SCC's case regarding these matters is set out in section 6 below, together with areas where it is anticipated that there may be common ground between SCC, IBC and ESC, and the Appellant. SCC will work with the other parties with a view to producing a SoCG in respect of these matters.
- 1.6. The following documents (to be included in the core documents library) are also referred to in support of this statement:
 - ESC - Suffolk Coastal Local Plan (2020)
 - IBC - Ipswich Core Strategy (2022)
 - SCC's Local Transport Plan (2011-2031)
 - SCC's Section 106 Developers Guide to Infrastructure Contributions in Suffolk
 - SCC's Schedule of Recommended Conditions
- 1.7 SCC will liaise with IBC and ESC and the appellants to finalise the core documents library.

2. Site Location

- 2.1. 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.

3. Application Timeline

3.1. SCC was formally notified of the planning application under reference DC/24/0771/OUT & 24/00172/OUT by letter (e-mail) from Ipswich Borough Council (IBC) and East Suffolk Council (ESC) on 2nd April 2024. This was in the form of a joint statement.

3.2. Formal consultation responses to the planning application were submitted to IBC and ESC by SCC throughout the lifetime of the appeal applications. The responses to the appeal applications included direct responses from the Highway Authority, the Lead Local Flood Authority (LLFA), the Suffolk Archaeological Service, and the Developer Contributions team. These responses are filed on the ESC and IBC planning webpages and can be found in Appendix 1.

3.3. The key dates are set out below:

- 5th March 2024 - Applications Validated Date
- 3rd April 2024 SCC Response (Archaeology) – holding objection
- 4th April 2024 SCC Response (Fire Service) - standard advice
- 23rd April 2024 SCC Response (Development Contributions) – setting out developer contributions
- 30th April 2024 SCC Response (Lead Local Flood Authority) – holding objection
- 24th May 2024 SCC Response (Local Highways Authority) – holding objection
- 2nd June 2024 refusal of applications

3.4. SCC Consultation responses are set out in the Appendix 1.

3.5. Whilst SCC does not have any objections in principle to the proposed development, there are important matters of detail which, in our view, have not been adequately addressed by the appellant. It is observed in the Appellants' Statement of Case that several of SCC's consultation responses are referred to as 'simply' holding objections requesting additional information rather than setting out any objection in principle. It is standard practice for SCC to submit a holding objection to the LPAs if we are not able to agree everything or require further information before our concerns can be confirmed as being addressed. The holding objection allows time for an applicant to submit further information to hopefully overcome the concerns we have. So, the onus is very much on the applicant to address/resolve any deficiencies with the application by the time it goes to planning committee. However, if an applicant hasn't overcome the identified deficiencies with their scheme, then that effectively becomes a formal objection from SCC for the LPA to report on and consider as part of the planning balance.

3.6. There also were pre-application discussions between SCC and the Appellants (or their consultants) in the form of in person and online meetings on respect of the planning applications with the LLFA and Highways Authority during November & December 2023. The LLFA also previously provided informal advice via email to the Appellants in August 2023 regarding the potential use of soakaways onsite and in September 2023 providing copies of flood risk incident records as requested. Developer Contributions responses setting out likely contributions were provided to the LPAs and Appellants (in response to their public consultation) in November 2023. SCC Archaeology had a meeting with the Appellants consultants in September 2023 and recommended that the site would require

geophysical (magnetometry) survey to inform preapplication evaluation trenches (4% with 1% contingency, 30m trenches).

3.7. Subsequent to the consultation response set out above the Appellants provided further documents including:

3.7.1. Response to LLFA consultation dated 8th May 2024. This was provided informally directly to SCC for review and due to workload pressures, it was requested by the LLFA that this information be directed via the LPA with a view to the LLFA being formally reconsulted on the document. A new consultation was not received prior to the determination of the application. This document has been included by the Appellants in their Statement of case - Appendix 3 - (draft)- response to LLFA comments 8th May 2024.

3.8. SCC has not been formally consulted on the above document, but it has been referred to as appropriate below.

3.9. Subsequent to the consultation response set out above SCC is aware that the Appellants on 30th September 2024 began conducting trenched archaeological evaluation commenced by Oxford Archaeology under the management of RPS.

4. Reasons for Refusal

4.1.A summary of the reasons for refusal is provided below.

4.2.The Reason for Refusals SCC is particularly concerned with are 1, 2, 3, 5, 8 and 13 (based on the IBC numbering). SCC understands that issues raised by SCC may also be considered relevant by IBC and ESC on other grounds of refusal but in this Statement our focus is on the technical matters which have been raised in our consultation responses and we consider need to be addressed.

RfR Summary	IBC RfR Number	ESC RfR Number
No masterplan submitted in support of the application	1	1
Impacts on highway network not properly assessed	2	2
Position of access onto Humber Doucy Lane	3	N/A
Landscape and Heritage Impact	4	3
Flooding and Drainage Strategy	5	4
Ecology and BNG	6	5
Adequacy of greenspace for HRA mitigation	7	6
Extent of pre-determination archaeological investigation	8	7
Air quality mitigation measures	9	8
Loss of sports pitches	10	N/A
Quantum of housing proposed	11	9
Quantum of open space proposed	12	10
Lack of completed s106	13	11

5. National and Local Planning Policy

National Planning Policy

- 5.1. In this section we focus on the policies which are more relevant to SCC's concerns rather than a comprehensive overview of all policies that may be relevant to this application.
- 5.2. The National Planning Policy Framework (NPPF), last updated in 2023, is a material consideration in determining this appeal. The following are considered relevant to the matters with which SCC is particularly concerned in this appeal.
- 5.3. The policies relating to **infrastructure contributions** are set out in section 4 of the NPPF under the heading 'Decision Taking' and sub section; 'Planning conditions and obligations'.
- 5.4. In relation to planning obligations, paragraph 57 requires all planning obligations to meet the following tests:
- 1) Necessary to make the development acceptable in planning terms
 - 2) Directly related to the development
 - 3) Fairly and reasonably related in scale and kind to the development
- 5.5. Paragraph 58 goes on to say that; 'it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.'
- 5.6. Section 8 (Promoting healthy and safe communities) requires planning decisions to provide the social, recreational and cultural facilities and services the community needs. Shared spaces, community facilities and other local services should be provided to enhance the sustainability of communities and residential environments (paragraph 97).
- 5.7. The policies relating to **highways** are set out in section 9 of the NPPF under the heading 'Promoting sustainable transport'.
- 5.8. Section 9 promotes the delivery of sustainable transport. Transport considerations should be considered at the earliest stages of plan-making and development proposals (paragraph 108). Significant development should be focussed on locations that can be made sustainable (paragraph 109). The emphasis is on limiting the need to travel and offering a range of transport modes, aimed at reducing congestion and emissions to improve air quality and public health (paragraph 109).
- 5.9. When considering development proposals paragraph 114 requires decision makers to ensure that:
- a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location
 - b) Safe and suitable access to the site can be achieved for all users
 - c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Code and the National Model Design Code; and

- d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 5.10. Paragraph 115 goes on to say that ‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe.’
- 5.11. Paragraph 116 sets out a number of requirements for development in relation to the provision of sustainable development. These include the prioritisation of pedestrians and cyclists, addressing the needs of people with disabilities, creating safe, secure and attractive streets, allowing suitable access for delivery and emergency vehicles and the inclusion of electric vehicle charging points.
- 5.12. Paragraph 117 requires all developments that will generate significant movements to submit a Travel Plan and Transport Statement or Transport Assessment, setting out the likely impacts of the proposal.
- 5.13. The policies relating to **drainage** are set out in section 14 of the NPPF under the heading ‘Meeting the challenge of climate change, flooding and coastal change’ and sub section ‘Planning and flood risk’.
- 5.14. Paragraph 175 states: ‘Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the lead local flood authority;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.’
- The policies relating to **archaeology** are set out in section 16 of the NPPF under the heading ‘Conserving and enhancing the historic environment’.
- 5.15. Section 16 sub heading ‘Proposals affecting heritage assets’ included paragraph 200 and 201. Paragraph 200 states “...Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation”. Paragraph 203 states, In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

Local Planning Policy

- 5.16. The Ipswich Borough Council Local Plan currently comprises the following documents relevant to this application:
- 1) Core Strategy and Policies Development Plan Document Review – adopted 23 March 2023

- 5.17. These documents contain the following objectives and policies considered relevant to the matters with which SCC is particularly concerned on this appeal.

Policy ISPA4 - Cross-boundary Working to Deliver Sites

- 5.18. Policy ISPA4 - Cross-boundary Working to Deliver Sites states that Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner.

Part i includes reference to; .”Primary school places and an early years setting to meet the need created by the development”;

Part vi. States “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”.;

Policy DM4 - Development and Flood Risk

- 5.19. Policy DM4 states that “Development will only be approved where it can be demonstrated that the proposal satisfies all the following criteria:... c) it will not increase the overall risk of all forms of flooding in the area or elsewhere through the mitigation of flood risk in the layout, design and form of the development and the appropriate application of Sustainable Drainage Systems (SuDS); ... f) it will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy...”

Policy CS10: Ipswich Garden Suburb

Policy CS10: Ipswich Garden Suburb identifies the education needs associated with development at the Ipswich Garden Suburb including a secondary school site allocated within the Red House neighbourhood, and safeguarded broad locations for primary schools within each of the neighbourhoods.

Policy CS15: Education Provision

- 5.20. Policy CS15: Education Provision states; “The Council supports the upgrading of education facilities and will seek to ensure that community access to school facilities is maximised.” And “New primary school provision will be needed to meet the demands of growth”.

Policy DM14: Archaeology

Policy DM14: Archaeology states; “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”.

Policy DM21: Transport and Access in New Developments

Policy DM21: Transport and Access in New Developments states a number of requirements that new development shall promote to achieve sustainable growth in Ipswich and reduce the impact of traffic congestion.

5.21. The East Suffolk Council Local Plan currently comprises the following documents relevant to this application:

2) Suffolk Coastal Local Plan – adopted 23 September 2020

5.22. These documents contain the following objectives and policies considered relevant to the matters with which SCC is particularly concerned on this appeal.

Policy SCLP9.6: Sustainable Drainage Systems

5.23. Policy SCLP9.6 states that “developments should use sustainable drainage systems to drain surface water. Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sqm of floorspace or on sites of 1 hectare or more, will be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate. Sustainable drainage systems should: a) Be integrated into the landscaping scheme and green infrastructure provision of the development; b) Contribute to the design quality of the scheme; and c) Deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible. This should be complementary of any local designations such as Source Protection Zones....”

Policy SCLP12.24: Land at Humber Doucy Lane

5.24. Policy SCLP12.24: Land at Humber Doucy Lane relates 9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings in conjunction with land identified in the Ipswich Local Plan. Development will only come forward as part of a masterplanned approach with land in Ipswich Borough.

Part c) refers to Provision of 0.1ha of land for an early years setting if needed within the part of the site in East Suffolk, and part e; “Provision for sufficient primary school spaces”;

6. Suffolk County Council's case

6.1. SCC has proactively engaged with the Appellant since April 2024 on the application. SCC remains open to ongoing dialogue with the parties and anticipate entering into Statements of Common Ground (SoCG) on highways and other SCC matters, prior to the opening of the Inquiry.

6.2. The topics that concern SCC are addressed below in the order of the reasons for refusal.

Highways

Reason for Refusal 2 - Transport

6.3. Reason for Refusal (RfR) 2 of both Ipswich Borough Council's (IBC's) and East Suffolk Council's (ESC's) refusal letters outline that the impacts of the development on the surrounding highway network need to be fully assessed to understand the acceptability of the proposals and the mitigation required, stating that the development proposals will also be expected to ensure opportunities to promote walking, cycling and public transport use are identified and secured.

6.4. In terms of the assessment of the impacts the development would have upon the local highway network, SCC, in its capacity as the Highway Authority response dated 24 May 2024 outlined some fundamental concerns relating to the submitted Transport Assessment (reference 230597, dated March 2024).

6.5. A primary concern associated with the submitted Transport Assessment relates to the methodology underpinning the trip distribution assumptions (how vehicular trips are distributed on the highway network). It is also understood that National Highways sought further information relating to how traffic is distributed to determine the impacts the development may have on key junctions on their network (strategic road network) and the recommendations made within the Highway Authority's response would provide additional information which could assist in reviewing the impacts on the strategic road network.

Transport Assessment

6.6. The submitted Transport Assessment utilised 2011 census travel to work data to establish where residents within the same area (Middle Super Output Area) as the proposed development site work. Once data for where the residents work was attained, routing options were assessed, and assumptions were made as to the routes those residents are likely to take, based on the length of the route and the time taken to travel the route, as per Section 6.5 of the submitted Transport Assessment.

6.7. While the approach taken for trip distribution is standard for smaller scale development, it is not considered suitable for a development of this scale due to the potential impacts it may have upon the local highway network. This is because the trip distribution is predicated on 2011 data, which has the potential to not represent 2024 conditions, and focuses on journeys to work in isolation, omitting other journey purposes.

6.8. Another primary concern surrounding the trip distribution included within the Transport Assessment is that it does not consider dynamic re-distribution, meaning that traffic

distribution associated with future year scenarios are predicated solely on trip distribution determined through the base year assessment and not re-distributed based on future anticipated convenience and journey times.

Trip Distribution and the Suffolk County Transport Model (SCTM)

- 6.9. SCC set out in its pre-application advice and in its consultation response that the Suffolk County Transport Model (SCTM) should be used to test the developments impact on the local highway network. The SCTM is a strategic highway model built in Saturn that has been calibrated and revalidated to reflect traffic conditions for a base year 2019. The advantages of the SCTM are that it considers trip distribution on a significantly greater scale than what was considered within the Appellants assessment, it is not predicated on 2011 data and is not specific to journeys to work (it covers all journey purposes).
- 6.10. SCTM outputs provide a comprehensive understanding of how trips are anticipated to distribute on the network, considering trips directly associated with a particular site and general background trips of which are growthed to a future year (2032) to ensure impacts associated with future growth are suitably assessed. A primary advantage of using the SCTM is that, unlike the Appellants assessment, traffic is dynamically re-distributed in the future year scenarios, meaning that factors such as journey times and convenience which may lead to traffic using different routes – both of which may be directly impacted through the development proposals – will be included within the assessment.
- 6.11. As set out in paragraph 4.27 of the Appellants Statement of Case, use of the SCTM is not a requirement for planning applications; however, given the scale and nature of the Appeal site, it was outlined at both pre-application and formal application stage that the Highway Authority expected strategic modelling to be completed to ensure a comprehensive assessment of the highway network is undertaken, with use of the SCTM being an option that had been identified to the Appellants.
- 6.12. The Appellants have commissioned and were provided with the outputs from the SCTM in June 2024. However, those do not form any part of the submitted Transport Assessment. To-date, SCC has not seen anything from the Appellants in respect of the SCTM data or how it may differ from or otherwise affect the assessment set out within the submitted Transport Assessment.
- 6.13. In terms of trip generation (the quantum of trips anticipated to leave and enter the Appeal site), SCC, as the Highway Authority is generally content with the approach within the submitted Transport Assessment. Notwithstanding this, it was highlighted within its consultation response that it appears that anticipated trip generation forecasts did not correlate with the trip generation inputted into junction models and that a further review should be undertaken due to the potential for flows within the submitted junction modelling to be understated.
- 6.14. Both trip generation and trip distribution are key to determining which junctions upon the local highway network should be assessed in greater detail through junction modelling. Due to the concerns surrounding trip distribution, it is not considered that the Transport Assessment has suitably assessed the junctions which may require detailed junction modelling. The SCTM outputs would assist in determining junctions which would

require detailed junction modelling of which may not have been included within the Transport Assessment.

- 6.15. In terms of the junctions which were modelled within the Transport Assessment, concerns were raised with how flows were inputted, given that at times they appeared to differ from what was included within the flow diagrams. As above, the SCTM outputs afford the potential to change trip distribution, and it would be anticipated that this would be considered and updated accordingly within the junction modelling.
- 6.16. The concerns surrounding the trip distribution presented within the submitted Transport Assessment, and the subsequent junction models produced which rely on traffic flows as a key input, has implications on the proposed vehicular accesses as it is not considered that the modelling submitted to support them can be relied upon or that the impacts resultant of their delivery has been assessed. SCC would expect the SCTM outputs to be reviewed and for modelling to be updated appropriately, and without this cannot be satisfied that the location of the access would not present an unacceptable impact on highway safety.
- 6.17. The proposed signalised junction opposite Inverness Road is of particular importance given design requirements and the potential impacts it may have upon the local highway network. In particular SCC is concerned that:
- surrounding trip distribution leads to concerns around the junction model in that SCC is not confident on the inputted flows. [A junction model will show the performance of a junction (i.e., will it lead to queuing and delays?). A key input into the model is traffic flows (how many vehicles are using the junction). If we are not confident with the flows (i.e, how many vehicles will use the junction), we cannot be confident in the junction model outputs. If the flows are understated, the performance of the junction could come out better than the reality].
 - The location of the proposed signalised junction affords the potential to intensify vehicular trips on Inverness Road and the implications of this need to be suitably assessed.
 - The submitted Transport Assessment does not consider potential re-distribution of background traffic resultant of the introduction of the proposed signalised junction and the potential impacts this may have.
 - Further design elements require clarification, including forward visibility for vehicles approaching the signalised junction, of which is imperative to highway safety.
- 6.18. Given that further details relating to visibility are required and that it is not considered that the impacts of the proposed signalised access opposite Inverness Road have been suitably assessed, SCC cannot be satisfied that the location of the access would not present an unacceptable impact on highway safety, or that the residual cumulative impacts on the road network would not be severe.
- 6.19. Visibility associated with the proposed priority junction from Tuddenham Road was also highlighted as a concern within SCC's consultation response. It is considered that the visibility to the north of the access (onto southbound traffic) would be substandard in that visibility was insufficient for the actual speeds reported, when considering local speed data available to SCC. SCC's consultation response stated that the visibility splay should be increased and re-submitted for assessment to ensure that appropriate visibility

could be provided within land under control of the Appellant or within highway maintainable at public expense. Increased visibility splays were not provided.

6.20. To-date, SCC is unclear on the level of visibility which can be achieved for the Tuddenham Road access and subsequently, in the event that permission is granted for development, SCC considers it would be necessary to include a Grampian condition which ensures that the existing 30mph speed limit on Tuddenham Road is extended north to ensure the visibility splays are included within the 30mph section.

6.21. In summary, SCC's (in its capacity as the Highway Authority) concerns are associated with the Transport Assessment and vehicular access proposals relating to visibility and design, as well as a lack of confidence in the Appellants anticipated trip distribution for development related traffic, and the impacts the development may present on background traffic (traffic not associated with the development site). It is not considered that the Appellants have suitably assessed the impacts that the development may present on the local highway network and subsequently, further information is required to establish suitability of proposals and compliance with Paragraph 115 of the National Planning Policy Framework 2023 (NPPF), in terms of highway safety and impacts.

Walking and cycling

6.22. In terms of the approach taken to ensure opportunities to promote walking, cycling and public transport use are identified and secured, SCC's consultation response outlined some fundamental concerns relating to the Appellant's efforts to ensure appropriate accessibility for walking, cycling and to public transportation.

6.23. SCC outlined expectations at both pre-application stage and in response to the formal planning consultation for the Appellants to consider the key destinations and facilities for future residents and determine the key active and sustainable travel routes between the application site and those destinations. This was to include reviewing accessibility to walking, cycling and public transportation.

6.24. Once those key routes had been established, the Appellants would have been expected to undertake an audit of those routes to establish substandard infrastructure and determine necessary improvements to prioritise and incentivise active and sustainable modes of travel. SCC does not consider that this was undertaken and notes that the Appellants have not proposed any off-site improvements beyond the frontage of the development site, contrary to local and national planning policies.

6.25. While the Appellants did undertake a pedestrian audit, no recommendations were made to improve those routes, and little consideration was given to cycling accessibility and compliance with Local Transport Note (LTN) 1/20. Both the Highway Authority and Active Travel England (Section 4.4) recommended that the Appellants should undertake a more thorough review of key routes and determine improvements for pedestrian movement, but also consider cycling in line with LTN 1/20 standards, with key destinations including Ipswich Town Centre, local shops and education facilities.

6.26. Delivery of a development of this scale without the provision of safe and suitable walking and cycling infrastructure is not only considered to contravene policies relating to incentivising, prioritising and maximising accessibility to sustainable modes of travel, but

also to policies surrounding highway safety. The application site is located in a location which will generate demand for walking and cycling and while infrastructure is essential for achieving a suitable and ambitious mode share for active and sustainable modes, it is essential to ensure those routes are safe and suitable.

- 6.27. To summarise the above in terms of walking and cycling, whilst proposals demonstrate that consideration has been given to the provision of walking and cycling within the proposed development site (albeit which require further consideration), 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. SCC's consultation response stated that 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. This has not been provided.
- 6.28. Alongside an audit of existing walking and cycling infrastructure, SCC's response also outlined the need to provide information of traffic speed data on Humber Doucy Lane to enable an assessment of the suitability of the proposed pedestrian and cycle crossings required to enable connectivity between the eastern and western parcels. This has not been provided.
- 6.29. SCC's consultation response listed a range of improvements to the local public rights of way (PRoW) network raised by the SCC PRoW team to improve connectivity for future residents of the application site, which are summarised below.
- Footpath 45: surfacing improvements will be required to facilitate increased footfall associated with the application site.
 - Footpath 48: surfacing improvements will be required to facilitate increased footfall associated with the application site.
 - Footpath 49: surfacing improvements will be required to facilitate increased footfall associated with the application site.
- 6.30. It is acknowledged that the Appellant has proposed to facilitate bus penetration into the application site and SCC has been in discussion with Ipswich Busses to establish a public transport strategy which would offer residents with suitable and convenient accessibility to public transportation. SCC will require a suitable planning obligation to pump prime a bus service which penetrates the Appeal site with a 20-minute frequency.
- 6.31. A segregated walking and cycling facility is proposed within the site boundary on the northern side of Humber Doucy Lane, for both the eastern and western parcels. Non-inclusion of the Ipswich Rugby Club land results in the need for the route to transition into a shared use facility on the southern side of Humber Doucy Lane, between the junction of Sidegate Lane to the proposed parallel crossing west of Ayr Road, resulting in a less direct and coherent route when compared with a fully segregated route within the development site which would be achievable with inclusion of the Rugby Club land.
- 6.32. An additional primary issue with non-inclusion of the rugby club land relates to the constraints this presents on vehicular access. The reasons for proposing the main vehicular access for the western parcel – of which is anticipated to cater for most of the allocated residential units – opposite Inverness Road is due to the existing access

serving the rugby club rendering it unsuitable to provide this access opposite Sidegate Lane.

Reason for Refusal 1 - Masterplan

- 6.33. RfR 1 of both IBC's and ESC's refusal letters relate to the Appellants not having submitted a masterplan. SCC did not raise this in its consultation responses and it is not understood that these reasons for refusal directly resulted from its consultation responses. SCC notes, however, that some of the points of concern raised in its consultation response could have been resolved in the event of a masterplan being produced which incorporated the land associated with Ipswich Rugby Club. It should be recognised that while these issues were highlighted within the SCC's consultation response (in its capacity a Highway Authority) to outline how the development could be improved, it was not stated that the development as proposed would be unacceptable to the Highway Authority, provided additional information was submitted which demonstrated suitability (as summarised above).

Humber Doucy Lane

- 6.34. Reason for Refusal (RfR) 3 of both Ipswich Borough Council's (IBC's) refusal letter outline the fundamental concerns with the principal junction in the location proposed. As outlined within SCC's consultation response, it has not been evidenced that a suitable signalised junction design can be delivered at this location, and it is considered 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. 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. SCC has detailed its concerns around design and acceptability in response to RfR 3 and does not comment upon character and visual impact which is an LPA issue.
- 6.35. See Appendix 2 - Schedule of conditions – for suggested draft conditions in the event the Inspector disagreed with SCC's view that the points in this section are not reasons for refusal.

Highways planning obligations

- 6.36. RfR 13 of IBC's refusal letter and RFR 11 of ESC's refusal letter states that at the time of decision no Section 106 Legal Agreement has been agreed and therefore, policies which relate to the provision of infrastructure are not complied with. SCC will seek to discuss infrastructure requirements and planning obligations with the Appellants to agree matters through a Statement of Common Ground.
- 6.37. The list of highways mitigation measures that can only be delivered by SCC through a S106 are set out below:
- Legal costs associated with the reduction of speed limits on Tuddenham Road to 30mph).
 - Public Rights of Way improvements.
 - Pump priming bus services to penetrate the site.

- Travel Plan monitoring and support.
- Ipswich Strategic Planning Area.

Flooding and Surface Water Drainage

- 6.38. On 15th April 2015 SCC, as Lead Local Flood Authority (LLFA), became the statutory consultee in respect of flood risk and surface water management for major planning applications.
- 6.39. National Planning Policy Framework (NPPF) Paragraph 165 states that.
“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”
- 6.40. Paragraph 175 states: ‘Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
- a) take account of advice from the lead local flood authority;
 - b) have appropriate proposed minimum operational standards;
 - c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d) where possible, provide multifunctional benefits.’
- 6.41. In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.
- 6.42. SCC, in its capacity as LLFA, was consulted by IBC and ESDC and reviewed the documents submitted with the application, which included but was not limited to:
- Flood Risk Assessment and Drainage Strategy Dated: Feb 2024 Ref: 681058-R1(0)-FRA
- 6.43. The site is largely at low risk of flooding from all sources, fluvial (river), pluvial (surface water), tidal, groundwater, reservoir and sewer flooding and thus suitable for the proposed development. It is agreed that there is a small, isolated area at high risk of pluvial flooding in the eastern portion of the site however this could be addressed by the removing the low spot when the levels strategy for the site is finalised.
- 6.44. However, based on the information that was contained within the application a holding objection was submitted to ESDC and IBC requesting specific information to be provided because insufficient information has been submitted to the LLFA to assess the application with respect to sustainable surface water management.
- 6.45. SCC LLFA acknowledges the further information provided in May 2024, responding to the points the LLFA raised. Although not formally consulted on it, SCC LLFA has considered this information and considers a number of the concerns resolved, namely points 1, 2, 3 & 4 of the from the LLFA’s original 9 points of objection in the consultation

response. The information required to satisfy the remaining points, 5, 6, 7, 8 and 9, and the specific reasons for the objection are set out in the following section.

Flooding and Surface Water Drainage - Outstanding Concerns

- 6.46. The LLFA consider that the following matters are still required to be addressed to overcome SCC's objections on surface water drainage grounds:
- 6.47. Point 5 (sub catchments). Many of the sub catchments use the more traditional pipe to pond approach which does not incorporate above ground conveyance of surface water or address surface water at source. The strategy should be reconsidered to include more SuDS within the parcels, e.g. basins for source control and swales to convey to the wider network that are designed at this stage to accurately reflect landtake and form. The strategy should also address what non-strategic SuDS principles will be used in the delivery of individual parcels such as raingardens, downpipe planters, tree pits, and other green infrastructure.
- 6.48. No masterplan (reason for refusal 1) was submitted but the Appellants Statement of Case states an illustrative site-wide Framework Plan and illustrative site-wide Landscape Strategy, which fed into the Parameter Plans, set the limits for future reserved matters applications on matters of land use including green and blue infrastructure. It is SCC's view that the drainage elements cannot be controlled by condition or through the detail stage, because the feasibility of the proposed mitigation has not been established at the outline stage. This view is supported by recent decisions by the Planning Inspectorate (Ref:APP/K0425/W/20/3245292 Wendover Arms Hotel, Desborough Avenue, High Wycombe, APP/P0240/W/22/3298555 Hatley Road, Wrestlingworth, APP/K0425/W/18/3218645 Land adjacent to Tollymore, Askett).
- 6.49. Point 6 (assessment of surface water hazard potential). The simple index approach has been used to assess the surface water pollution hazard potential however the applicant has not demonstrated the sufficient design requirements have been achieved to provide treatment compliant features at this stage. The requirements for treatment can have a significant effect on the size/form of features. It has not been demonstrated the proposal will not result in pollution of surface water it is therefore contrary to Paragraph 175 of the Framework.
- 6.50. Point 7 (highway drainage). In accordance with the Suffolk SuDS Guide and Suffolk Design for Streets Guide the main access roads should be drained to roadside swales. Cross sections should be provided to demonstrate how space has been provided to ensure this can be accommodated in the final layout. This should be provide for at the outline application stage This must be demonstrated at this stage as if sufficient space is not left within the site, it will not be possible to deliver a SuDS compliant strategy at the more detailed stage. The proposal is therefore contrary to Paragraph 175 of the Framework and local plan policies DM4 and SCLP9.6.
- 6.51. Point 8 (drainage of the school plot). The pre-school plot will require a connection to services and utilities and this often extends to the SuDS network. It is understood the appellant is looking to deliver the setting location within the mixed use area. This should be included for at this stage. This must be demonstrated at this stage as if sufficient space is not left within the site, it will not be possible to deliver a SuDS compliant strategy at the more detailed stage. The proposal is therefore contrary to Paragraph 175 of the Framework and local plan policies DM4 and SCLP9.6, and appeal decisions

referred to in 6.49 are relevant as any substandard provision at this stage is unlikely to produce an outcome that is in accordance with SuDS principles as the site is developed.

- 6.52. Point 9 (strategic swales and basins). The strategic swales and basins should have dimensions provided to demonstrate they are in accordance with the Suffolk SuDS Guide. At present the indicative cross-section submitted is also sub-standard as the water depths in the Northern basins exceed 1m and no wet benching has been provided. As many of the parcels are currently shown to be drained by traditional drainage, it is likely that the invert level of the pipes will be too deep to discharge into surface features, and this should be considered at this stage to avoid excessive below ground infrastructure being required at the detailed design stage. This must be demonstrated at this stage as if sufficient space is not left within the site, it will not be possible to deliver a SuDS compliant strategy at the more detailed stage. The proposal is therefore contrary to Paragraph 175 of the Framework and local plan policies DM4 and SCLP9.6. Appeal decisions referred to in 6.49 are again relevant as strategic SuDS infrastructure should be thoroughly thought about and laid out at the earliest stages of a development.
- 6.53. It is not evident from the information provided in the application that there is sufficient space to accommodate SuDS features and it is SCC's view that this should have been demonstrated at the outline stage. If sufficient space is not left within the site, it will not be possible to deliver a SuDS compliant strategy at the more detailed stage. The proposal is therefore contrary to Paragraph 175 of the Framework and local plan policies DM4 and SCLP9.6.
- 6.54. See Appendix 2 - Schedule of conditions – for suggested draft conditions in the event the Inspector disagreed with SCC's view that the points above are not reasons for refusal.

Archaeology

- 6.55. This large development proposal is situated within an area of very high archaeological potential recorded in the County Historic Environment Record (HER). Geophysical survey (AOC Archaeology, 2023) has shown several areas of previously unknown and dense archaeological anomalies which suggested that there could be more archaeological remains that were not detected. However, this application site had 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.
- 6.56. National Planning Policy Framework (NPPF – 4.1) paragraph 200 states that:
“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

- 6.57. A Desk-Based Assessment (RPS, 2023) was submitted with application which argued that the combination of desk-based and geophysical assessment did not provide evidence that field evaluation was necessary prior to determination.
- 6.58. SCC Archaeological Service ("SCCAS") responded to the planning application on 3rd April 2024 advising the need for pre-determination archaeological evaluation in accordance with paragraph 200 and 201 of the NPPF. This reflects pre app advice given by Rachael Abraham (Senior Archaeological Officer, SCCAS) in November 2022
- 6.59. SCCAS advised that in order to establish the full archaeological implications of this area and the suitability of the site for the development, the Appellants 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). The evaluation should comprise of a trenched archaeological evaluation to "ground-truth" the results of the geophysical survey. It was SCCAS's view that the large area encompassed with the application site could not be assessed or approved for the proposed development until a full archaeological evaluation had been undertaken, with the results enabling SCCAS to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 200 and 201 of the National Planning Policy Framework.
- 6.60. Decisions on the suitability of the site, and the need for, and scope of, any further work should below-ground heritage assets of significance be identified, would be based upon the results of that evaluation.
- 6.61. To support the application, on 1st February 2024 a Written Scheme of Investigation was approved by SCCAS, but trenched archaeological evaluation was only commenced on 30th September 2024 by Oxford Archaeology under the management of RPS consulting on behalf of the Appellants.
- 6.62. The position now is that SCC is satisfied that the reasons for refusal on archaeology can be addressed by condition for the following reasons.
- 6.63. The trenched archaeological evaluation is being used to ground truth the geophysical survey results, sampling geophysical anomalies as well as any blank spaces to assess the significance of archaeological heritage assets.
- 6.64. Thus far the trenched archaeological evaluation has recorded the presence of archaeology with preliminary dating (in the absence of specialist reporting as the fieldworks has not been completed) from the Medieval and Post Medieval periods with other features as yet undated that could be from either the Roman or Prehistoric periods.
- 6.65. The results record two main concentrations of archaeology (as suggested by the geophysical survey) and the absence of any funerary material. What blank trenches have been seen and the targeted trenches over the geophysical anomalies shows that in this instance the geophysical survey has largely been accurate in showing the extent of archaeological remains on this site.
- 6.66. On notification of the appeal and due to the unfinished trial trench evaluation Dr Hannah Cutler (Senior Archaeological Officer, SCCAS) instructed RPS and Oxford Archaeology that all trenches targeting strong geophysical responses be stripped and pre excavation features and recorded using GPS as a priority to determine if any

remains of national significance schedulable quality worthy of preservation in situ are present.

- 6.67. Whilst trial trench evaluation is ongoing and unfinished, these areas of strong geophysical responses have now been exposed and have been viewed by Dr Cutler sufficiently enough to update the SCCAS opinion: SCCAS is satisfied that whilst there are archaeological remains that will certainly require targeted mitigation excavations there is nothing of schedulable quality (national significance) and worthy of preservation in situ.
- 6.68. It should be noted that whilst the SCCAS is content that any remaining archaeological works can now be secured by condition based on trenching completed thus far, much of the pre excavation interpretation of the nature (date, function) of the archaeological remains in the DBA has not been accurate and whilst the apparent significance of the observed remains is equivalent to those predicted, this was not certain at the time of the application and should not have been treated as such without evidence as required by paragraphs 200 and 201 of the NPPF.
- 6.69. See Appendix 2 - Schedule of conditions - for suggested conditions in the event that planning permission is granted for the development SCC would therefore request that the two conditions be included to secure remaining evaluation and archaeological mitigation, post-excavation reporting, publication, and archiving.

Infrastructure Contributions

Planning Obligations - Section 106 / CIL – Reason for Refusal 13 and 11 (Lack of completed S106 agreement)

- 6.70. The site-specific policies in both the Ipswich Borough Council Local Plan and the Suffolk Coastal Council Plan include a requirement for financial contributions ranging from education, waste, libraries, healthcare, through to local sustainable travel measures. This section of SCC's Statement of Case deals with the non-highway S106 contributions.
- 6.71. As set out above the application covers two Local Planning Authority areas and ESC is a CIL charging Authority, therefore some of the infrastructure identified below will fall to CIL rather than S106. This includes Libraries, Waste, Sixth Form expansion and Secondary new build (as per ESC Infrastructure Funding Statement). As it is not clear what proportion of dwellings will fall in the East Suffolk district a per dwelling cost has been provided.
- 6.72. The Appellants Statement of Case states they intend to work with the two Local Planning Authorities in preparing a suitable s106 document to cover the delivery of affordable housing, relevant local infrastructure enhancements, and any other necessary mitigation.
- 6.73. SCC have had ongoing contact from 17th October 2024 from Jan Kinsman of EFM (Educational Facilities Management Partnership Limited) who is acting for the appellant and requested further information regarding the education contributions including summer forecasts and details of delivery of proposed infrastructure.
- 6.74. It is not known at this time whether the s106 contributions requested by SCC to secure appropriate mitigation for the libraries, and waste are agreed by the Appellants, but the e-mail of 17th October 2024 indicated that the Appellants "probably need to look

at the justification for the non-education infrastructure items” and has since asked for further supporting information.

6.75. The Appellants’ agent followed this up in an e-mail on 6th November 2024 reaffirming this position that there is likely to be some points of disagreement between us, but emphasised this was not so much in terms of the principle of making contributions on the service areas raises, but in terms of the factors that go into those calculations.

6.76. In the 23 April 2024 consultation response SCC set out the non-highway infrastructure contributions sought as follows:

Service Requirement	Capital Contribution	Per dwelling cost
Early Years New (standalone) @ £36,050 per place	£1,982,750.00	£3,004.17
Early Years site – fully serviced freehold	£1	-
Primary School New @ £28,760 per pupil place	£6,097,120.00	£9,238.06
Secondary School New @ £37,443 per place	£3,706,857.00	£5,616.45
Sixth Form expansion @ £29,095 per place	£989,230.00	£1,498.83
Household Waste @ £138 per dwelling	£91,080.00	£ 138.00
Libraries Improvements @ £216 per dwelling	£142,560.00	£ 216.00
SEND	TBC	TBC
Primary School Transport	TBC	TBC
Highways	TBC	TBC
Monitoring fee (per trigger point)	£476	£476

6.77. SCC will review the level of contributions sought to take account of updates such as summer forecasts and project costs to ensure such contributions sought will meet the CIL regulation 122 tests. A CIL compliance statement will be submitted ahead of the Inquiry to justify these contributions once reviewed.

Education contributions

6.78. When estimating the number of children (pupil yield) that will require a school place arising from a new housing development, SCC takes into account the number of bedrooms in houses and flats that will accommodate children. Student and elderly accommodation (with restrictive conditions) are excluded from the calculation. It should be noted that the pupil yields cover both market and affordable housing. It is widely acknowledged that affordable housing and larger properties tend to generate more pupils. When assessing the pupil yield for a development proposal, the county council will apply the relevant pupil yields according to the expected housing mix.

6.79. SCC’s pupil yields are taken from the ‘headline’ yields for Suffolk provided by the Department for Education [Pupil Yield Data Dashboard](#). The DfE guidance *Estimating pupil yield from housing development* (August 2023) recommends at paragraph 15 that the “starting point is the “headline” pupil yield factors for 2021/22, as these are based on the full sample of developments between 2008 and 2022”. These yields are considered a baseline position which could be

supplemented or adjusted to local circumstances and evidence. The DfE dashboard provides a technical note to accompany the data, and when reviewing the data it is important to only select Suffolk along with the dwelling type, size and all tenure from the filters.

6.80. For contributions toward primary and secondary places the pupil yield is calculated to 2 decimal places per individual dwelling and a whole number for calculations per 100 dwellings. For sixth form places the pupil yield is calculated to 3 decimal places per individual dwelling and to 1 decimal place for calculations per 100 dwellings. The calculated pupil yield will be rounded up to the nearest whole number to determine the total number of places required per phase of education.

6.81. This pupil yields will be used to forecast the education needs for each type of education provision arising from new housing developments in the County. The pupil yield factors allow for estimation of the number of early years, primary, secondary, and post-16 places required as a direct result of development. The school phase age yields from qualifying dwellings (flats or houses) are set out in Table 5, below:

Table 5: Estimated pupil yields for different dwelling types

Dwelling Type	Primary pupil yield (2021/22)		Secondary pupil yield (2021/22)		Sixth Form pupil yield (2020/21 reporting year. DfE figures for the 2021/22 year are not available)	
	Per Dwelling	Per 100 Dwellings	Per Dwelling	Per 100 Dwellings	Per Dwelling	Per 100 Dwellings
Houses with 2 or more bedroom	0.32	32	0.15	15	0.055	5.5
Flats with 2 or more bedrooms	0.18	18	0.05	5	0.017	1.7
Flats with 1 bedroom	0.03	3	0.02	2	0.015	1.5

6.82. With a development up to 660 dwellings this gives rise to the following pupil yields:

Primary School Pupils – 212
Secondary School Pupils (11-16) – 99
Secondary School Pupils (16-18) - 34

Primary School

6.83. SCC is legally obliged to ensure sufficient school places, and therefore it needs to identify how this would be achieved, should planning permission be granted.

6.84. The nearest school is Rushmere Hall Primary School. This school has an academy funding agreement capacity of 630 place (a published admission number (PAN) of 90). Recently, the PAN has been reduced to 60. The school is forecast to be oversubscribed. Of the three new schools proposed in the Ipswich Garden Suburb, the application site is nearest to the Red House Neighbourhood of Ipswich Garden Suburb where there is a planned new primary school. Primary school places required to accommodate the calculated pupil yield could be provided at the new schools serving Ipswich Garden Suburb. This would be in the form of new primary school contributions secured by S106 as set out in the table above. The new Primary Schools serving the Red House Neighbourhood and Fonnereau Neighbourhood will be delivered linked to dwelling build out rates. The first of the three primary schools serving the Ipswich Garden Suburb is the new Henley Gate primary school is expected to be open in September 2027. However, discussions are ongoing with the appellant's education consultant – it is envisaged matters will be set out in a statement of common ground (also identifying any issues in dispute).

6.85. Both the Suffolk Coastal Local Plan on page 488 Appendix 4B and the East Suffolk Infrastructure Funding Statement (2023) page 69 states SCLP 12.24 primary contribution is funded by s106. This is on top of CIL payable in the ESC area of the site. The IBC element will be S106.

Secondary School

6.86. At the secondary school level, the nearest schools are forecast to exceed 95% capacity during the forecast period. The proposed strategy for mitigating this growth has been via the provision of a new secondary school within the Red House Neighbourhood of the Ipswich Garden Suburb. However, this strategy is currently under review to determine if existing secondary schools serving the proposed development can be expanded. This issue will be further discussed with the appellant's education consultant and covered in a statement of common ground (also identifying any areas in dispute).

6.87. As per the DfE *Securing developer contributions for education* guidance paragraphs 32 and 33, SCC rely on the published and regionally adjusted scorecard costs, but as per paragraph 35 bespoke costs will be used where it is justified. This is a matter we are discussing with the appellants.

6.88. Secondary School contribution is to be funded by CIL in respect of that part of the application site falling within ESC's area as informed by the Suffolk Coastal Local Plan Infrastructure Delivery Framework. It will need to be secured by s.106 for that part of the application site falling with IBC's area.

Sixth Form

- 6.89. Appropriate pupil yield assessment needs to be made and s106 contributions secured to mitigate impacts. For the ESC element of the scheme this will be covered by CIL.

SEND

- 6.90. Appropriate pupil yield assessment needs to be made and s106 contributions secured to mitigate impacts. The DfE Securing Developer Contributions for Education (August 2023) paragraph 37 states; "Special schools require more space per pupil than mainstream schools, and this should be reflected in the assumed costs of provision. Many local authorities set the costs of special or alternative provision school places at four times the cost of mainstream places, consistent with the additional space requirements in Building Bulletin 104".

School Transport

- 6.91. An assessment needs to be undertaken with the Appellants to ensure that all pupils arising can safely walk from the proposed development to local schools. The absence of safe walking routes would be a significant deficiency with the proposed development and would need to be addressed by the Appellant. If there are deemed to be no safe walking routes, then s106 school transport contributions will be required to be secured if the scheme is allowed on appeal.
- 6.92. SCC will look to agree a Statement of Common Ground on these matters, or in absence of agreement, will address these matters further in its evidence.

Early years

- 6.93. In Suffolk it is estimated that statutory requirements generate a need for 13 additional FTE places per 100 new dwellings calculated as set out below
- 6.94. The adopted SCC Developers Guide to Infrastructure Contributions in Suffolk Topic Paper on Early Years and Childcare states in paragraph 7.1.4; "Where a development proposal is anticipated to create over 20 FTE places, then a new provision will be sought. This will include the land and contributions for the construction of suitable premises for a new provision". This is in line with the Local Plan policies ISPA 4.1 part f (i) (Primary school places and an early years setting to meet the need created by the development) of the Core Strategy and Policies Development Plan Document Review (2022) and the Suffolk Coastal Local Plan policy SCLP12.24 part c) (provision of 0.1ha of land for an early years setting if needed within the part of the site in East Suffolk;).

- 6.95. Early years settings have been secured across Suffolk following this approach. These include:

Site	Application number of dwellings	Planning Reference
Land to the north and west of School Road Elmswell Suffolk	86	DC/18/02146
Land east of The Street and Loraine Way Bramford Ipswich	190	DC/18/00233
Land to the east of Station Road Long Melford Suffolk	150	DC/18/00606
Land north of Walton High Street Felixstowe Suffolk	385	DC/16/2778/OUT

- 6.96. The application includes an 'Early Years facility' within the description and paragraph 3.22 of the Planning Statement states a new on-site building would be provided within the mixed-use area and an area of 0.22 ha for an Early Years facility. The Appellants Statement of Case at paragraph 3.11 refers to the Local Centre on the Land Use Parameter Plan, but when considering the parameter plan it is understood this is within the mixed-use development parcel.
- 6.97. Due to the extended entitlement to eligible parents of free early years childcare from the age of 9 months, a 90 place early years setting is now required to accommodate the development. A sufficient size of land to accommodate the early years site is a minimum site area of 0.32 hectares.
- 6.98. In addition to the developer contributions for education set out above, SCC require unencumbered freehold transfer of the early years site to SCC for £1. This site will need to be free of Surface Water Drainage (SuDS) features and the site, when transferred, will be provided with all necessary services and be free of encumbrances. This is in line with approach adopted with the sites above. The early years site location can be identified in a land use parameter plan and planning obligation land use plan or it will need to be identified at the reserved matters stage.
- 6.99. The Appellants, via their education consultant, have proposed that they would potentially want to deliver the setting themselves via PVI (Private, Voluntary and Independent) provision, and this is expected to be an area of disagreement between the parties. As the statutory responsibility for ensuring early year provision lies with SCC, (who have successfully delivered such provision elsewhere in Suffolk through build and lease out using developer contributions), it is for the Appellants to provide evidence of how they can deliver a building that is registerable with Ofsted on terms that make is viable for childcare providers – and importantly will be available in perpetuity. The critical issue is that if the appeal is allowed, then early years facilities must be available for the lifetime of the development – and it is therefore appropriate for SCC, as the authority with statutory responsibility, to have full control over the asset for the benefit of local residents.
- 6.100. Once the location is agreed within the scheme at the reserved matters (noting that this is a sub-optimal approach in the absence of a masterplan) stage a detailed planning permission for the early years setting will be sought by SCC either via a reserved matters application to ESC/IBC or a full application to be determined by SCC. A

significant deficiency with there being no approved masterplan is that the location of the early years setting within the scheme is uncertain – this is in conflict with the NPPF Chapter 12 Achieving well-designed and beautiful places as set out in paragraphs 131, 132, 133, 134, and 135.

Waste

- 6.101. £138 per dwelling is required, which is based on the existing and proposed (allocations and undetermined planning applications) catchment households (2021) sharing the capital cost towards the delivered project. For this development of up to 660 homes, the total contribution sought for waste is £91,080. A project has recently been delivered at Foxhall Recycling Centre which involved considerable forward funding including £6.8 million SCC capital funding as well as £958,914 CIL funding from East Suffolk Council. An additional project is to relocate the existing [Portman Walk Recycling Centre](#).

Libraries

- 6.102. The development is projected to give rise to 1,164 people (660 dwellings x 2.4 persons per household). These new residents represent an addition to the number of residents currently within the catchment of Ipswich Library. The total contribution is calculated as £216 x 660 = £142,560

Other SCC Service Areas

- 6.103. With regard to the remaining SCC service areas, including Suffolk Fire and Rescue, SCC wishes to rely on the comments made in the consultation responses submitted to WSC. This response is standard advice and filed on the ESC and IBC planning portal and summarised below.

Fire and Rescue

- 6.104. Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations, although Suffolk Fire and Rescue Service requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.
- 6.105. Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions and that proper consideration be given provision of an automatic fire sprinkler system.

7. Summary and Conclusion

- 7.1. SCC has engaged positively with IBC and ESC and the appellants throughout the highways and transportation, education and early years, archaeological and drainage discussions on this site.
- 7.2. The key outstanding matters between ESC/IBC/SCC and the Appellants relate to:
 - 7.2.1. the adequacy of the transport assessment, sustainable transport provision, infrastructure contributions (highways early years, education (primary, secondary, sixth, and SEND provision), libraries, and waste); and insufficient detail of design of the drainage system.
- 7.3. Unless these matters are satisfactorily resolved SCC will be asking the Inspector to dismiss the appeal.

Appendices



The Archaeological Service

Growth, Highways and Infrastructure
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

James Mann
Head of Development
Ipswich Planning Services
Ipswich Borough Council
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Our Ref: CSF46993
Date: 03/04/2024

For the Attention of Rosalynn Claxton

Dear Mr Mann

Planning Application IP/24/00172/OUTFL – Land Between Humber Doucy Lane and Tuddenham Lane Humber Doucy Lane, Ipswich: Archaeology

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.

Given the high potential, lack of previous investigation and large size of the proposed development area, I 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). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 200 and 201 of the National Planning Policy Framework.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should below-ground heritage assets of significance be identified, will be based upon the results of the evaluation.

The geophysical survey results will be used to make a decision on the extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as

part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Hannah Cutler

Senior Archaeological Officer
Conservation Team

Your ref: IP/24/00172/OUTFL & DC/24/0771/OUT
Our ref: 60296 & 60297
Date: 23 April 2024
Enquiries to: Peter Freer
Tel: 01284 758475
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By e-mail only: development.management@ipswich.gov.uk
planning@eastsuffolk.gov.uk

FAO Roz Claxton & Eleanor Attwood

Dear Roz & Eleanor,

Re: Land Between Humber Doucy Lane and Tuddenham Lane - developer contributions

I refer to the 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 covers two Local Planning Authority areas and East Suffolk Council is a CIL charging Authority, therefore some of the infrastructure identified below will fall to CIL rather than S106. This includes Libraries, Waste, Sixth Form expansion and Secondary new build. As it is not clear what proportion of dwellings will fall in the East Suffolk district a per dwelling cost has been provided to simply this for the decision taker.

This letter sets out the infrastructure requirements arising from the above identical applications lodged with both East Suffolk Council and Ipswich Borough Council. It is understood that Ipswich Borough are the lead authority determining the application.

The supporting Planning Statement refers to overall housing numbers of 690 dwellings, with a conservative figure of 660 maximum number of homes. The questioning of the Ipswich Local Plan policy figure of 449 dwellings, based on the 60% allocated for housing at 35 dwellings per hectare to produce a figure of 499 dwellings, needs to state whether this assessment has included open space and other land use requirements.

Summary of infrastructure requirements based on 660 dwellings set out below:

Service Requirement	Capital Contribution	Per dwelling cost
Early Years New (standalone) @ £36,050 per place	£1,982,750.00	£3,004.17
Early Years site – fully serviced freehold	£1	-
Primary School New @£28,760 per pupil place	£6,097,120.00	£9,238.06
Secondary School New @ £37,443 per place	£3,706,857.00	£5,616.45
Sixth Form expansion @ £29,096 per place	£989,264.00	£1,498.88
Household Waste @ £138 per dwelling	£91,080.00	£ 138.00
Libraries Improvements @ £216 per dwelling	£142,560.00	£ 216.00
SEND	TBC	TBC
Primary School Transport	TBC	TBC
Highways	TBC	TBC
Monitoring fee (per trigger point)	£476	£476

The county council and district/borough councils have a shared approach to calculating infrastructure needs, in the [Section 106 Developers Guide to Infrastructure Contributions in Suffolk](#).

The Suffolk Coastal Local Plan Review was adopted on 26 September 2020. Part of this site is included in the Suffolk Coastal Local Plan as SCLP12.24, Land at Humber Doucy Lane, Rushmere St Andrew. The policy includes;

- c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in East Suffolk;
- e) Provision for sufficient primary school spaces.

The adopted Local Plan includes Appendix A - Delivery Framework which refers to the Early Years site requirement, and Appendix B – Infrastructure Delivery Framework which sets out the infrastructure requirements and funding sources. This includes the following in respect of this site allocation:

- Early years setting at Land at Humber Doucy Lane, Rushmere St Andrew (Policy SCLP12.24). Type of developer contribution; **S106**.
- Capacity for additional pupils at new Ipswich Garden Suburb Primary (Policies SCLP12.66, SCLP12.67, SCLP12.24). Type of developer contribution; **S106**.
- Capacity for additional pupils at Ipswich Garden Suburb Secondary School. Type of developer contribution; **CIL**.

The Ipswich Borough Council Local Plan was adopted on 23 March 2022. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 10 seeks to retain, improve and provide high quality and sustainable

education facilities, health facilities, and sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet local demand.

- Policy CS17 which requires all developments to meet site related infrastructure needs and, where the provision of new or the improvement of existing infrastructure is needed, the development is expected to mitigate its impacts.

ISPA Policy 4.1 allocated part of this site. This policy includes:

i) Primary school places and an early years setting to meet the need created by the development;

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;

Overall the Ipswich Borough Council Local Plan Review policy ISPA4.1 allocates 449 dwellings and Suffolk Coastal Local Plan Policy SCLP12.24 allocates approximately 150 dwellings.

Community Infrastructure Levy and S106

East Suffolk are a CIL charging authority and have published an [Infrastructure Funding Statement](#) for the which includes an 'infrastructure list' starting on page 57, setting out how required infrastructure should be funded by either CIL or S106. East Suffolk Council adopted a revised CIL Charging Schedule and charges CIL on planning permissions granted after 1 August 2023.

The County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the contributions being agreed between the applicant and the local authority, the development cannot be considered to accord with relevant policies.

The National Planning Policy Framework (NPPF) [December 2023] paragraph 57 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The details of the impact on local infrastructure serving the development is set out below and will form the basis of developer contributions funding:

1. Education. Paragraph 99 of the NPPF states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

Furthermore, the NPPF at paragraph 110 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;'

The Department for Education (DfE) publication 'Securing developer contributions for education' (August 2023), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 2019]. Paragraph 41 of the DfE guidance states, "We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including temporary education needs where relevant, such as temporary school provision and any associated school transport costs before a permanent new school opens within a development site."

SCC's pupil yields are taken from the 'headline' data for Suffolk provided by the Department for Education [Pupil Yield Data Dashboard](#). These are per dwelling (2 bedroom+); 0.32 Primary, 0.15 Secondary and 0.055 for Sixth Form.

In paragraph 32 of the DfE guidance 'Securing developer contributions for education' it says, "We advise that you base the assumed cost of mainstream school places on the relevant average regional costs published in the DfE school places scorecard. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the regional average to account for inflation since the latest scorecard base date". Paragraph 35 of the guidance states; "Where you have a reasonable expectation of higher costs based on local planning policy requirements, known site abnormalities or recent trends of higher delivery costs for projects in your area, these can be used in preference to the regional average in the school places scorecard".

SCC does have evidence of higher delivery costs for projects in Suffolk

and there are set out below:

- a) Early Years age range 2-4: Cost per place is £36,050 (2024 Suffolk costs for new build).

To note that the government announced in the March 2023 budget that childcare provision is to be extended for children from age nine months up to the age of four, which will roll out from April 2024.

- b) Primary school age range, 5-11: Cost per place is £28,760 (2024 Suffolk cost for new build 420 place school).
- c) Secondary school age range, 11-16: Cost per place is £37,443 (2024 Suffolk cost for new build Secondary School).
- d) Secondary school age range, 16-18: Cost per place is £29,096 (DfE school places scorecard (June 2023) cost for expansion).

SCC would anticipate the following **minimum** pupil yields from this development:

School level	Minimum pupil yield:	Required:	Cost per place £:
Primary school age range, 5-11:	212	212	28,760
Secondary school age range, 11-16:	99	99	37,443
Secondary school age range, 16+:	34	34	29,096

Pupil places contributions total:	£10,793,241.00
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The site is within the catchment of Rushmere Hall Primary School and Northgate High School (11-18).

Primary School build costs

The catchment school is forecast to be at capacity and cannot be expanded any further.

A proportionate developer contribution, based on the primary age pupils

forecast to arise from the proposed development is calculated above and set out in the table at the start of this letter.

The allocation is nearest to the Red House Neighbourhood of Ipswich Garden Suburb but there should be flexibility with either of the three new primary schools serving Ipswich Garden Suburb to provide places for this proposal. This would be in the form of new primary school contributions secured by S106. The new Henley Gate primary school is expected to be open in September 2026 which is the first of the three primary schools serving the Ipswich Garden Suburb. The new Primary Schools serving the Red House Neighbourhood and Fonnereau Neighbourhood currently have no dates for delivery at this moment in time but will be delivered linked to dwelling build out rates.

Safe Routes to Schools

School infrastructure delivery on the IGS will obviously be phased and depending on when this scheme is built out will inform SCC of the most suitable primary school to attend from a pupil place planning perspective.

Depending on when this site comes forward an assessment of safe routes to school will be required and it may be that the distance to the nearest primary school with places will be over 2 miles, and primary school transport costs may be necessary. The SCC transport policy states that transport will be provided for children up to 8 years old where the statutory walking distance is over 2 miles, and for children 8 and over the statutory walking distance is 3 miles.

An important aspect of progressing this scheme will be ensuring that there are safe walking routes to local schools (including those planned on IGS) and we would expect the scheme promoters to address this important issue. Hopefully, this will result in a situation where all pupils can walk to school and no contribution to school transport will arise. If it is determined a requirement it will be based on a calculation of £1,405 x number of pupils x 7 years.

Secondary School

At the secondary school level the school is forecast to exceed 95% capacity during the forecast period. The proposed strategy for mitigating this growth is via provision of a new secondary school within the Red House Neighbourhood of the Ipswich Garden Suburb. On this basis, a capital contribution is set out in the above table.

Sixth Form

The pupils arising from this development would necessitate the provision of additional sixth form places. The strategy for sixth form provision is to provide places at Northgate High School Sixth Form which is programmed to be

expanded.

SEND

The SEND developer contributions requirement is being reviewed and will be updated separately.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

To note that the government announced in the March 2023 budget that childcare provision is to be extended for children from age nine months up to the age of four. This is proposed to be rolled out from April 2024.

The published guidance from the DfE in paragraph 36: "Developer contributions for early years provision will often be used to fund places at existing or new school sites, incorporated within primary schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school, unless you have alternative local/regional cost data for new or expanded standalone settings (either maintained or PVI sector) that more accurately reflect the type of new early years provision required in your area".

Paragraph 3.22 of the Planning Statement confirms the provision of an 'Early Years Nursery' on a site of 0.22ha. Paragraph 3.23 discusses a second element of non-residential built floorspace, and paragraph 3.25 states the two elements are purposely co-located and; "set in the centre of the site next to the central open space, to form a clear 'heart' to the development, to provide a focal point for community activity, and to maximise the opportunity for walking and cycling to local facilities for residents". Whilst SCC support this co-location, it's

important that the Early Years setting is standalone and it is not considered shared use.

For standalone Early Years settings which are not part of new primary school sites SCC uses a contribution of £36,050 per place (60 place setting cost calculated from our recently completed cost review).

From this development proposal SCC would anticipate the following pre-school places arising:

	Minimum number of eligible children:	Required:	Cost per place £ (2024):
Pre-School age range, 2-4:	55	55	36,050

Required pre-school contributions:	£1,982,750.00
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This proposed development is in the Carlford & Fynn Valley. When taking into account approved development proposals in the ward a deficit of places is forecast, and the development based on existing calculations generates 55 FTE places. The Government's extended entitlement is being rolled out in phases from April 2024 and the take up of the additional hours is likely to require more FTE places and larger site areas. This calculation is being reviewed.

Pre-school land requirements

- The new setting will require a fully serviced site.
- All BNG requirements to be addressed by the wider site requirements.
- Unencumbered freehold to be transferred to SCC for £1.
- SCC would need to be involved with identifying the location of the setting and would expect the scheme promoter to pay for a feasibility study.

3. Play space provision. This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.

4. Transport issues. Refer to the NPPF 'Section 9 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Luke Cantwell-Forbes will coordinate this.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated October 2023¹).

5. Libraries. Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

The Arts Council England in partnership with The National Archives has produced Guidance on seeking and securing developer contributions for library and archive provision in England (September 2023). This summarises the previous Museums Libraries and Archives Council (MLA) publications: Public Libraries, Archives and New Development: A Standard Charge Approach [May 2010]; and Museums, libraries, archives, arts provisions and new development: Progress report on the adoption of standard charge approaches [June 2010]. The MLA suggests using 30 sqm of library floorspace per 1,000 population. The MLA guidance recognises that contributions may not always be used to construct new library floor space but might be used to upgrade or refurbish existing provision. For example, it is suggested a contribution based on the MLA benchmark figure could be used for IT provision, the reorganisation of library space within buildings and other refurbishments to increase public access.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A contribution of £216 per dwelling is sought, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (3 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. This gives a cost of £216 / dwelling for the support of improving services and outreach at Ipswich Library.

Libraries contribution:	£142,560.00
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6. Waste. All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when

¹ Suffolk Guidance for Parking (October 2023) <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

A contribution of £138 per household is required to improve/relocate the Recycling Centre facilities serving Ipswich and surrounding areas. A project has recently been delivered at Foxhall Recycling Centre which involved considerable forward funding including £6.8 million SCC capital funding as well as £958,914 CIL funding from East Suffolk Council. An additional project is to relocate the existing [Portman Walk Recycling Centre](#). The East Suffolk element can be deducted as there was an element of forward funding in the CIL bid for the Foxhall project.

Waste contribution:	£91,080.00
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7. **Suffolk Fire and Rescue Service** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC strongly recommends the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.
8. **Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 62 to 65 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

9. **Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority. Paragraphs 159 – 169 refer to planning and flood risk and paragraph 169 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.'

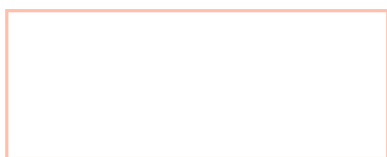
A consultation response will be coordinated by Suffolk County Council Floods Team.

10. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs associated with work on a S106A, whether or not the matter proceeds to completion.

11. Monitoring fee. The CIL Regs allow for charging of monitoring fees. In this respect the County Council charges **£476** for each trigger point in a planning obligation, payable upon completion of the deed.

12. Time Limit. The above information is time-limited for 6 months only from the date of this letter and will be reassessed for reconsultations.

Yours sincerely,



Peter Freer MSc MRTPI
Senior Planning Officer (Infrastructure)
Growth, Highways & Infrastructure Directorate

cc SCC, Luke Cantwell Forbes
SCC, Sarah Finn
SCC, Kelly Smith
SCC, Penny Bates
SCC, Floods Team
SCC, Archaeology
SCC, Suffolk Fire and Rescue
ESC, CIL Team

Our Ref: SCC/CON/1093/24

Date: 24 May 2024

Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.

Email: development.management@ipswich.gov.uk

The Planning Department
Ipswich Borough Council
15-17 Russell Road
Ipswich
Suffolk
IP1 2DE

For the attention of: Rosalynn Claxton

Dear Rosalynn Claxton

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: 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).

LOCATION: Land Between Humber Doucy Lane And Tuddenham Lane Humber Doucy Lane

Suffolk County Council (SCC) in its capacity of the Local Highway Authority recommends that a **Holding Objection** is upheld until the information presented within this consultation response has been submitted for review, in the interest of ensuring that the impacts to the local highway network are suitably assessed and to ensure that opportunities to promote walking, cycling and public transport use are identified and pursued, in accordance with national and local policy requirements.

ACCESS AND ACCESSIBILITY CONSIDERATION:

The proposed site is severed by the existing rugby club on Humber Doucy Lane and subsequently, there are initial concerns around permeability and connectivity within the site which should be considered by the Local Planning Authority. For the purpose of this consultation response, the section of the site situated west of the rugby club will be referred to as the 'western parcel' and the section of the site situated east of the rugby club will be referred to as the 'eastern parcel'.

A segregated walking and cycling facility has been proposed within the site boundary on the northern side of Humber Doucy Lane, for both the eastern and western parcels. The route transitions into a shared use facility on the southern side of Humber Doucy Lane, between the junction of Sidegate Lane to the proposed parallel crossing west of Ayr Road. Consideration should be given to the feasibility of providing a continuous route on the northern side of Humber Doucy Lane to accord with the LTN 1/20 principles of directness and coherence and to ensure compliance with policies outlined within Section 9 National Planning Policy Framework 2023 (NPPF) and Local Plans. This is of particular importance given that it is anticipated that this route would provide connectivity for residents on the eastern parcel to the early years facility and non-residential uses associated with the western parcel.

In terms of vehicular access, the development proposes to provide access from Humber Doucy Lane and Tuddenham Road; with a signalised junction proposed opposite Inverness Road, a priority (bus only) access opposite Sidegate Lane and a priority junction from Tuddenham Road to serve the western parcel, as well as a priority junction from Humber Doucy Lane to serve the eastern parcel.

In terms of the western parcel, it is understood that the access serving the existing rugby club constrains the potential to provide the main signalised site access at the junction of Sidegate Lane, as opposed to the junction of Inverness Road, of which is currently proposed. 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:

The comments above relate to recommendations which are considered to improve the development proposal and the following comments relate to the access proposals as currently proposed with this planning consultation. It should be recognised that the preference for site access remains to be in line with the recommendations above, in the interest of maximising accessibility and connectivity and prioritising active modes of travel, in accordance with local and national planning policies.

Site access – bus only (opposite Sidegate Lane):

It is noted that a bus-only access is proposed from Humber Doucy Lane, opposite Sidegate Lane. It is recognised that this is within close proximity to the access serving the Ipswich Rugby Club and while the preference would be for the rugby Club access to be altered to be served from the internal spine road associated with this development, concerns relating to potential 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 being achieved from the main vehicular access opposite Inverness Road.

The bus-only access should be designed with a width of 3.25m, to accommodate one-way movement, and a radius as close to 6.0m as possible (dependant on vehicle tracking). Vehicle tracking for busses should be submitted to demonstrate that access proposals will accommodate bus movements from each of the relevant accesses.

It is recognised that there is a proposal to provide a parallel crossing west of the bus-only access. This is supported as it is likely to form part of a key desire line; however, it should be noted that these crossings will require lighting and, in some locations, such as the crossing west of Ayr Road, this may require further removal of vegetation.

Site access – signalised junction (opposite Inverness Road):

A signalised junction has been proposed opposite Inverness Road – of which is presented within submitted Drawing Number 890695 RSK ZZ XX DR C 0003 Revision P02. It has not been evidenced that a suitable signalised junction design can be delivered at this location. Initial comments have been received from the Suffolk Highways Traffic Signals team in relation to the design proposal, of which are included below.

- Forward visibility splays should be provided for the signal heads on each approach. Basic forward visibility splays are 40m where 85th percentile speeds are 30mph and 52m where 85th percentile speeds are 40mph.
- Confirmation should be provided that there is no intention to provide push buttons within the proposed island – this should be a straight over crossing point.
- It appears that the proposed crossing point is to accommodate walking and cycling and should be designed with a width of 4.0m, as standard. Further consideration also needs to be given to what the walking and cycling crossing point connects to, given that it appears to connect to existing footway provision on Inverness Road.
- Tactile paving should be to the back-edge of the footway on the north-west side of the crossing.

Consideration needs to be given to ongoing connections for pedestrians and cyclists from this junction. As alluded to above, the proposed pedestrian and cycle crossing appears to lead into existing footway provision, with no transition for cyclists to join Inverness Road.

Consideration must be given to the potential impacts to Inverness Road afforded by the proposal to situate the main site access at the junction of Inverness Road and Humber Doucy Lane. It is anticipated that this will increase vehicle trips on Inverness Road for flows distributing to and from Sidegate Lane. Mitigation will likely be required to minimise these flows, given that Inverness Road should not be relied upon to facilitate the development.

Site access – priority junction (Tuddenham Road):

Section 5.3.1.3 of the submitted Transport Assessment outlines that “*the design of the accesses ensures that intervisibility is provided between drivers, pedestrians and cyclists, offering pedestrian priority and suitable visibility splays for vehicles emerging onto Tuddenham Road and Humber Doucy Lane*”. Visibility splays for the junction onto Tuddenham Road have been proposed with an X-Value of 2.4m, and Y-Values of 43m for northbound traffic and 136m for southbound traffic, as per submitted Drawing Number 890695 RSK ZZ ZZ DR C 0002 Revision P02.

The proposed 136m northbound Y-Value appears reasonable on the basis that it would accommodate 85th percentile speeds of 47.2mph. However, SCC would be seeking a contribution to fund an extension to the existing 30mph speed limit further north, to ensure that the access junction is situated within the 30mph zone.

The proposed 43m southbound Y-Value appears low when considering the 85th percentile speed data available to SCC. The data shows 85th percentile speeds close to 40mph, which would require a Y-Value of 82m. This appears achievable within the redline boundary and highway boundary; however, the plan should be amended to demonstrate this.

It appears that 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. Currently, the proposed 2.0m footways appear to terminate in advance of Tuddenham Road and further consideration should be given to a suitable transition point.

It is noted that the land accessed from Tuddenham Road – parcel D on the submitted Parameter Plans – does not include cycle infrastructure, as per the submitted Cycle Movement Parameter Plan (Drawing Number HDL-PRP-XX-XX-DR-A-08206 REV P02). 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.

Site access – priority junction (Humber Doucy Lane eastern parcel):

SCC supports the proposal to design the proposed walking and cycling route so that it naturally sets-back into the site to retain a 10m clearance between the facility and the nearside edge of Humber Doucy Lane, while retaining the desire line. However, the access arrangement should be revised with the walking and cycling facility maintaining a continuous level, like Figure 10.15 of LTN 1/20.

It does not appear that cycling routes have been proposed for Parcels E1 and E2 and subsequently, the proposed access does not offer a cycling facility into the development site. Further consideration should be given to how the layout will be designed to suitably accommodate cycling and whether the proposed site access should be designed with a cycle facility incorporated.

While the proposed segregated walking and cycling route is shown to terminate just before Seven Cottages Lane and rejoin Humber Doucy Lane, it does not appear that consideration has been given to the provision of a suitable transition. Further details of the proposed transition should be provided. It would also be beneficial to provide a suitable connection from this point onto Seven Cottages Lane itself, given that it is a Quiet Lane and will offer a suitable onward route for walking and cycling on Tuddenham Lane and Lamberts Lane.

There is an existing bus stop on Humber Doucy Lane near Seven Cottages Lane, near to the connection to the proposed walking and cycling facility. This 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. This stop serves Route Number 59 and will provide future residents accessibility to the route between Ipswich Town Centre and Little Bealings. Details can be shown indicatively at this stage to ensure sufficient space is provided within proposals and further details can be secured via a suitable planning condition.

Based on Google Maps, the Local Centre on Selkirk Road is approximately 0.4 miles from the Public Right of Way (PRoW) between Parcels E1 and E2 (Footpath 48) via Kinross Road, Roxburgh Road and Renfrew Road. This is likely to attract walking and cycling trips and subsequently, a suitable crossing point should be provided at this location on Humber Doucy Lane to provide a direct connection to the route from the PRoW. Furthermore, consideration should be given to the interaction between the proposed walking and cycling facility and the PRoW, given that the walking and cycling facility is proposed to cross the PRoW.

Information relating to the upgrade of Footpath 48 – and other PRow's – are included under section "Public Rights of Way Enhancements" of this consultation response. This should be considered in conjunction with the crossing point on Humber Doucy Lane referred to within the previous paragraph.

A separate cycle track should be provided adjacent to Footpath 48 which will provide cycle permeability central to the site. Currently, there is a lack of pedestrian and cycle access proposed for the eastern site parcel and the introduction of a suitable access point, crossing on Humber Doucy Lane, PRow improvements (Footpath 48) and central cycle track will provide a central access point and enhance overall site accessibility and permeability.

Proposed walking and cycling facility and Crossings:

Parallel crossings have been proposed on Humber Doucy Lane and as outlined above 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:

SCC engaged throughout the pre-application discussions associated with this application and outlined a clear expectation for the Suffolk County Transport Model (SCTM) to be used determine anticipated trip distribution. This was considered necessary given the scale of the development and the routing options within the vicinity of the site.

It remains the Highway Authority's position that the SCTM should be used to assess potential trip distribution from the site, when considering the potential for future residents to utilise Main Road, Church Lane, Lower Road and other alternatives to the A1214 corridor south of the site.

It is understood that the applicant has requested model outputs from the SCTM which can be used for assessment purposes. This will include outputs associated with the Base Year, as well as the Future Year scenario, inclusive of committed development. This information should be submitted for review as part of the Transport Assessment associated with this development proposal.

As per Section 6.5 of the submitted Transport Assessment – March 2024 – 2011 travel to work Census data was used alongside Google Maps as a basis for trip distribution. Upon a review of the submitted Trip Assignment Diagram included within Appendix 13, it is apparent that most of the routing will be towards Ipswich, with minimal movements anticipated to route towards Tuddenham. The SCTM will provide a useful comparison for these assumptions. Furthermore, routing north of Access One (Tuddenham Road access) is limited to a straight-ahead movement to Tuddenham and does not assess potential movements on Church Lane, Westerfield Road and Lower Road, of which offer an alternative route option for westbound movements to the A1214 corridor. The SCTM should be used to assess potential distribution on these routes.

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). This requires further consideration given that it could lead to understated flows within the submitted junction modelling.

Further information relating to how trip generation was split amongst the separate site accesses should be provided. Based on the trips illustrated within the submitted Traffic Flow Diagrams, the following proportions have been modelled:

- Access One (Tuddenham Road): 8% - 53 dwellings.
- Access Two (Humber Doucy Lane – western access): 82% - 541 dwellings.
- Access Three (Humber Doucy Lane – eastern access): 10% - 66 dwellings.

The submitted Transport Assessment provides an assessment of multi-modal trips; however, the information is limited to peak times. Trip rates for active and sustainable travel should be extracted from the TRICS outputs and presented as a total day number.

Trip generation has been submitted for the residential use of the site; however, it does not appear that trip generation has been established for the proposed Early Years use. It is anticipated that the Early Years provision will serve the development site itself and subsequently, trips will be self-contained. The trip rates are accepted on this basis.

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 modelling associated with Access Two should consider the junction with Inverness Road open to motorised traffic and with Inverness Road closed to motorised traffic, in the event this arm of the junction is stopped-up to facilitate the development (see section '*Site access – signalised junction (opposite Inverness Road)*' within this consultation response).

The Origin-Destination model inputs for each of the junction models should be reviewed as they do not appear to correlate with the submitted Traffic Flow Diagrams. As an example, for the Tuddenham Road / Colchester Road / Valley Road roundabout, full build-out with committed development scenario, the Flow Diagrams show an ahead movement from Colchester Road to Valley Road of 1,030 during the PM peak. When looking at the inputted model data, it appears this movement has been inputted as from Tuddenham Road (NB) to Tuddenham Road (SB). There are numerous examples of this and it is advised that each of the models are reassessed.

The submitted traffic modelling includes trips associated with committed development. The committed developments included within these trips should be stated and links provided to the associated Transport Assessments where the trips were extracted from. Individual flow diagrams associated with each committed development should also be provided. Ipswich Borough Council and East Suffolk Council – in their capacity of Local Planning Authority – should review the committed development and confirm they are satisfied.

It is recognised that the applicant has requested data from the SCTM, of which includes an assessment of committed development. The outputs from this exercise may satisfy the information requested within the previous paragraph, provided the Local Planning Authorities are content with the committed development sites utilised within the assessment.

Details of the junction geometry plans should be submitted for review to demonstrate how the inputted junction geometries were determined.

The Traffic Profiles associated with the submitted junction modelling have been run on a flat profile which requires further justification given the potential for flows to vary across the peak hours.

ACCIDENT DATA ANALYSIS:

Accident data has been provided within the proximity of the site for a 5-year period between 2018 and 2022. Data should be provided for a 7-year period between 2016 and 2024, to ensure up-to-date data is provided and to account for COVID-19. Upon an initial review of Crashmap, it appears that two additional 'slight' accidents are recorded on Humber Doucy Lane; west of Seven Cottages Lane and at the junction of Ayr Road, in addition to a 'serious' accident west of Inverness Road. The detailed report should be submitted for consideration.

A1214 AND TUDDENHAM ROAD ROUNDABOUT PROPOSAL:

Appendix 16 provides details of a proposed improvements scheme to the A1214 and Tuddenham Road roundabout junction, of which has been taken through submissions associated with the Ipswich Garden Suburb. It should be acknowledged that SCC will expect a design which better facilitates walking and cycling for any works required at this junction. This is an important improvement for this scheme given the need to provide walking and cycling accessibility between the site and the Ipswich Garden Suburb (particularly for education facilities) and Ipswich Town Centre.

SUSTAINABLE AND ACTIVE TRAVEL:

Section 9 of the NPPF includes a range of paragraphs which emphasise the importance of ensuring that transport issues are considered from the earliest stages of development proposals to ensure that opportunities to promote walking, cycling and public transport use are identified and pursued, with priority given to pedestrian and cycle movements, both within the scheme and neighbouring areas, and to facilitating access to high quality public transportation.

Paragraph 114 (a) of the NPPF states that when assessing new applications for development it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up. Paragraph 114 (b) of the NPPF outlines that new development should provide safe and suitable access to the site for all users.

Paragraph 116 (b) of the NPPF states that “*development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use*”.

Policy DM21 of Ipswich Borough Council's (IBC's) Local Plan (adopted March 2022) outlines a range of requirements in the interest of promoting sustainable growth in Ipswich and reducing the impact of traffic congestion on the network. The policy sets a clear expectation for development to:

- e) prioritise available options to enable and support travel on foot, by bicycle or public transport.
- f) have safe and convenient access to public transport within 400m, and facilitate its use through the provision or contributions towards services or infrastructure.
- h) ensure safe and suitable access for all users, including people with disabilities and reduced mobility.
- k) contribute as required to other mitigation measures identified through Policy CS20 and the ISPA Transport Mitigation Strategy.

Policy ISPA4.1 of IBC's Local Plan outlines that development on this land will be expected to comply with the following transport measures:

- 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;

Policy SCLP7.1 of the East Suffolk (Suffolk Coastal) Local Plan states that development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities, proceeding to outline that development proposals will be supported where:

c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken.

e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking.

g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety.

Policy SCLP7.1 also specifies that development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth and that opportunities to improve provision of or access to public transport, in rural and urban areas will be supported.

Policy SCLP12.24 of East Suffolk's local Plan acknowledges that transport modelling indicates capacity issues on the local highway network close to the site and specifies that a robust package of measures to promote sustainable transport is expected for any development proposal to mitigate any impacts on the surrounding road network.

OFF-SITE SUSTAINABLE AND ACTIVE TRAVEL:

Section 4 of the submitted Transport Assessment provides a general overview of accessibility to the site. The Pedestrian accessibility audit – Section 4.2 – discusses a variety of walking routes in the proximity of the development site; however, it fails to recommend what improvements could be made to existing infrastructure which will form part of the key movement corridors for pedestrians. Further consideration should be given to the key desire lines between the site and destinations and facilities in conjunction with the audit to establish off-site improvements necessary to enable safe and suitable pedestrian movement to and from the development site.

Like the comments relating to pedestrian movement above, little consideration has been given to off-site infrastructure requirements to accommodate cycling. Throughout pre-application discussions Sidegate Lane was discussed as a key corridor for walking and cycling movement, providing accessibility to Northgate High School, the A1214 corridor and destinations thereafter, such as infrastructure associated with the Ipswich Garden Suburb and Ipswich Town Centre, of which was identified as a key destination for sustainable travel requirements within the Local Plan.

A key requirement is to provide safe and suitable walking and cycling connectivity between the development site and the educational facilities within the Ipswich Garden Suburb, given concerns associated with limited capacity for schools closest to the development site.

A detailed plan showing walking and cycling improvements on Sidegate Lane must be submitted for consideration. This is vital as it will provide accessibility to the site and connect into the on-site walking and cycling infrastructure. It should be noted that based on surveyed traffic flows on Sidegate Lane, on-carriageway cycling (mixed traffic) is considered *“provision suitable for few people and will exclude most potential users and/or have safety concerns”* in terms of LTN 1/20 (Figure 4.1). Therefore, it is evident that improvements are required on Sidegate Lane to accommodate off-carriageway cycling.

To summarise the above in terms of walking and cycling, 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 the local and national policy requirements outlined above. 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.

It is anticipated that a planning obligation will be sought to extend existing bus service(s) within the area to accommodate the new development site, and SCC is currently in discussion with the relevant bus operators. It is recognised that a bus-only access has been proposed from Humber Doucy Lane to serve the eastern section of the site, with the internal road network intended to allow for busses to penetrate the site and rejoin Humber Doucy Lane. This approach is supported, and consideration will need to be given to the walking routes within the site to enable suitable accessibility to bus infrastructure for future residents. Consideration will be given to Table 2 of the Suffolk Design: Streets Guide when reviewing actual walking distances to bus infrastructure.

PUBLIC RIGHTS OF WAY (PRoW) ENHANCEMENTS:

- **Footpath 45:** Consideration will need to be given to the walking and cycling connection which crosses Footpath 45. This connection will be essential to ensure that all areas of the site have access to the proposed strategic walking and cycling corridor.

Consideration will need to be given to the surfacing of Footpath 45 and any necessary improvements required to facilitate increased footfall. The SCC PRoW has confirmed they will be undertaking a site visit to determine necessary improvements.

- **Footpath 49:** Consideration will need to be given to the surfacing of Footpath 49 and any necessary improvements required to facilitate increased footfall. The SCC PRoW has confirmed they will be undertaking a site visit to determine necessary improvements.
- **Footpath 48:** Consideration will need to be given to the interaction between Footpath 48 and the proposed east-west segregated walking and cycling facility. Consideration should be given to the access on Humber Doucy Lane. As alluded to elsewhere within this consultation response, consideration should be given to linking Footpath 48 to a new crossing facility on Humber Doucy Lane and it may be that the footpath is directed onto the proposed walking and cycling facility to accommodate suitable access onto Humber Doucy Lane. The provision of a cycle track adjacent the current footpath would also provide connectivity for cyclists, without the need to change the status of Footpath 48 which continues north outside the development site.

Consideration will need to be given to the surfacing of Footpath 48 and any necessary improvements required to facilitate increased footfall. The SCC PRoW has confirmed they will be undertaking a site visit to determine necessary improvements.

INTERNAL LAYOUT:

Improvements should be made to the walking and cycling links internally within the site illustrated within the submitted Pedestrian and Cycle Parameter Plans (Drawing Numbers HDL-PRP-XX-XX-DR-A-08205 REV P03 and HDL-PRP-XX-XX-DR-A-08206 REV P02 respectively).

As discussed at pre-application stage, while it has been shown to provide cycle facilities adjacent to the proposed spine road, 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 as referenced on the Parameter Plans. Consideration would need to be given to cycle infrastructure for other parcels too, but this could be accommodated through shared use along sections of the proposed spine road, on the basis that a direct segregated route is provided centrally.

Consideration will need to be given to the walking and cycling infrastructure proposed to cross existing Footpath 45 and the proposed recreational route just north of the spine road illustrated within the Illustrative Landscape Strategy. The preference should be to continue the fully segregated route up to the land parcel north of Footpath 47 (parcel D within the Parameter Plans).

TRAVEL PLAN (NOT PART OF THE HOLDING OBJECTION):

A separate Travel Plan will be required for the proposed residential use and the early years facility. The Travel Plans will be required to be submitted six months prior to first occupation of the residential element of the development and six months prior to the early years use. Suitable Travel Plan condition(s) will be included within any recommendation of approval of this application.

PLANNING OBLIGATIONS:

TRAVEL PLAN CONTRIBUTION:

A planning obligation will be required to fund the ongoing monitoring of the Travel Plans associated with the site.

PASSENGER TRANSPORT CONTRIBUTION:

It is anticipated that a planning obligation will be required 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, in the interest of facilitating access to high quality public transport within the layout of the site in line with local and national policy requirements.

PUBLIC RIGHTS OF WAY CONTRIBUTION:

It is anticipated that a planning obligation will be sought to fund improvements to the existing PRow network within the development site.

TRAFFIC REGULATION ORDER CONTRIBUTION:

It is anticipated that a planning obligation will be sought to fund an extension to the existing 30mph speed limit on Tuddenham Road further north, to ensure that the access junction is situated within the 30mph zone.

IPSWICH STRATEGIC PLANNING AREA (ISPA) CONTRIBUTION:

It is anticipated that a planning obligation will be requested to contribute towards the ISPA Transport Mitigation Strategy. Policy DM21 (k) of Ipswich Borough Council's Local Plan outlines that to promote sustainable growth in Ipswich and reduce the impact of traffic congestion, developments shall contribute as required to the ISPA Transport Mitigation Strategy.

Evidence shows that growth across the ISPA would cause a severe, cumulative impact on the function of the highway network within Ipswich and on the strategic highway network around Ipswich. Significant shift towards sustainable modes of transport is required to avoid severe, cumulative traffic impacts.

The ISPA Transport Mitigation Strategy is around maximising the potential for vehicular trip suppression and encouraging steps to prioritise healthy and sustainable travel. Walking and cycling are considered key sustainable transport modes that can be effective options for short journeys and the provision of suitable infrastructure can be a factor in achieving modal shift to these modes.

Yours sincerely,

Luke Cantwell-Forbes

Principal Transport Development Planner

Growth, Highways and Infrastructure

From: Hannah Purkis <Hannah.Purkis@suffolk.gov.uk>
Sent: 30 April 2024 14:34
To: Development Management
Cc: Rosalynn Claxton; Benjamin Locksmith
Subject: 2024-04-30 HP Reply Land between Humber Doucy Lane and Tuddenham Lane, Ipswich Ref: 24/00172/OUTFL

Dear Rosalynn,

Subject: Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane, Ipswich, Suffolk. 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.

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application Ref: 24/000172/OUTFL.

The following submitted document has been reviewed and the LLFA recommends a **holding objection** at this time:

- Flood Risk Assessment and Drainage Strategy Dated: Feb 2024 Ref: 681058-R1(0)-FRA

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. These points and other more technical details are listed in the bullet points below.

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

The points below detail the actions required to overcome our current objection:-

Watercourse network

1. A plan of the watercourse network is included in the flood risk assessment and drainage strategy however it is missing some of the watercourses within and/or adjacent to the site. It is of vital importance that the development does not adversely impact the existing surface water network and thus a detailed survey of the existing watercourse network should be undertaken. This should comprise a walkover of the watercourse network and trace each from where it approaches the site, its connectivity through or around it to its outfall beyond the site's boundaries including any culverted sections. The plan should be updated and photos included where necessary. Any required maintenance to the network needs to be highlighted to ensure that the new development will not increase offsite flood risk.

2. There is a watercourse adjacent highway on the eastern parcel that could be adversely impacted by the proposed highway upgrades. Any upgrade works to the existing highway need to be carefully planned in conjunction with existing onsite constraints.

Drainage Strategy

3. The hierarchy set out in the Suffolk SuDS Guide (based on the NPPF and CIRIA SuDS Guide) states that deep infiltration is a last resort and should only be considered once all other options have been fully assessed. Whilst shallow infiltration and a connection to a surface water sewer are understood to be not viable, a discharge to the nearby watercourse network should be considered further. 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. Constructing deep infiltration structures up to 8m below ground level as is currently proposed requires significant earthworks, is higher risk and less sustainable than surface-based solutions. The deep infiltration structures also increase the risk of discharging pollutants directly into the ground in an area highlighted as being vulnerable to pollution incidents.
4. The greenfield runoff rate has been calculated but is very low compared to the more typical figure of 2l/s/ha that is often used. If a restricted discharge to a watercourse is progressed then this should be reviewed to ensure a viable rate is proposed.
5. Many of the sub catchments use the more traditional pipe to pond approach which does not incorporate above ground conveyance of surface water or address surface water at source. The strategy should be reconsidered to include more SuDS within the parcels, eg. raingardens, downpipe planters, tree pits, permeable paving or swales.
6. The simple index approach has been used to assess the surface water pollution hazard potential however given the number of dwellings, a school and community uses proposed on the site, it is likely that the main distributor road will generate a greater level of pollution than can be assessed using this method. The assessment used only applies to roads with less than 300 traffic movements per day.
7. In accordance with the Suffolk SuDS Guide and Suffolk Design for Streets Guide the main access roads should be drained to roadside swales. Cross sections should be provided to demonstrate how space has been provided to ensure this can be accommodated in the final layout.
8. The school plot will require a connection to services and utilities and this often extends to the SuDS network. It should be confirmed with the schools team if they require a unrestricted discharge into the SuDS network as this may result in a change to the current proposal.
9. The strategic swales and basins should have dimensions provided to demonstrate they are in accordance with the Suffolk SuDS Guide. As many of the parcels are currently shown to be drained by traditional drainage, it is likely that the invert level of the pipes will be too deep to discharge into surface features and this should be considered at this stage to avoid excessive below ground infrastructure being required at the detailed design stage.

Kind regards

Hannah

Hannah Purkis BSc (Hons) MCIWEM C.WEM

Flood and Water Manager

Flood and Water Management (Lead Local Flood Authority)

Growth, Highways and Infrastructure Directorate

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX

Tel No: 01473 260386

Please Note: The Suffolk SuDS Guide has been updated (March 2023) and is available [here](#).

My working days are Monday – Thursday during term time.

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SCC – Schedule of Recommended Conditions

Highways

- 1.1 The highways mitigation required to facilitate the Appeal Site is identified below should the appeal be allowed. It should be recognised that these recommendations are based on the information that was presented with the planning application and additional mitigation may have been considered necessary following the additional information requested at the application stage.
- 1.2 The following improvements will need to be secured through a suitably worded condition:
- 1.3 The key access requirements to be secured by condition will be:
- The proposed signalised junction on Humber Doucy Lane.
 - The proposed bus access on Humber Doucy Lane.
 - The proposed priority junction on Humber Doucy Lane.
 - The proposed priority junction on Tuddenham Road.
 - Grampian condition to extend the 30mph speed limit on Tuddenham Road.
 - The proposed walking and cycling infrastructure on Humber Doucy Lane linking the eastern and western parcels.
 - Details of pedestrian and cycle access onto Seven Cottages Lane.
 - Details of pedestrian and cycle access onto Tuddenham Lane.
- 1.4 The development is expected to provide walking and cycling infrastructure along Sidegate Lane, where no cycle infrastructure currently exists, to provide connectivity to Northgate High School, the A1214 corridor and ongoing destinations, including Ipswich Town Centre and the Ipswich Garden Suburb.
- 1.5 The development is expected to provide walking and cycling infrastructure along the A1214 Colchester Road between Sidegate Lane west and Tuddenham Road, providing connectivity between the improvements on Sidegate Lane and ongoing connections to Ipswich Town Centre.
- 1.6 The development is expected to provide improvements to pedestrian routes between the Appeal site and the Selkirk Local Centre.
- 1.7 Both IBC's and ESC's Local Plans outline the need for the development to identify and improve highways and junctions on Humber Doucy Lane. The development is expected to improve the junction of Humber Doucy Lane and Tuddenham Road, to ensure suitable intervisibility between motorists at the junction and motorists on Tuddenham Road and to reduce the radius.
- 1.8 Bus infrastructure will be required as part of the internal site layout to provide future residents with accessibility to public transportation. A suitable planning condition will be required to secure details of the internal highway network, inclusive of bus infrastructure.

1.9 A condition will be required to secure the provision of a suitable travel plan which sets ambitious targets to achieve high proportions of sustainable and active modes of travel.

LLFA

1.10 Full Application Conditions

No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:

Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses

- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater

1.11 Outline Application Conditions

Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority (LPA). The scheme shall be in accordance with the approved FRA and include:

- a. Dimensioned plans and drawings of the surface water drainage scheme;
- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
- c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Qbar or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
- d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year rainfall event including climate change, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.
- h. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
 - i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

Within 28 days of practical completion of the last dwelling or unit, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

Archaeology

1.12 Condition 1 – Archaeological Mitigation condition:

No development shall take place within the site until an implementation of a full programme of archaeological work has been secured in accordance with a Written Scheme of Investigation which has been submitted and approved by the Local Planning Authority. The Written Scheme of Investigation shall include:

- a. The programme and methodology of site investigation and recording.
- b. The programme for post investigation assessment.
- c. Provision to be made for analysis of the site investigation and recording.
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation.
- e. Provision to be made for archive deposition of the analysis and records of the site investigation.
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation,

recording, reporting and presentation of archaeological assets affected by this development, in accordance with policy DM14 of the of the Ipswich Local Plan (2022) and Policy SCLP11.7 of Suffolk Coastal Local Plan (2020). and the National Planning Policy Framework (2023).

1.13 Condition 2 - Post-excavation Reporting, Publication and Archiving condition:

No dwelling hereby approved shall be occupied until the site investigation and post investigation assessment for the site has been completed, submitted to, and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with policy DM14 of the of the Ipswich Local Plan (2022) and Policy SCLP11.7 of Suffolk Coastal Local Plan (2020). and the National Planning Policy Framework (2023).