

## **Committee Report**

**Item No:** 6B

**Reference:** DC/21/05110

**Case Officer:** Elizabeth Flood

**Ward:** Sproughton & Pinewood.

**Ward Member/s:** Cllr Richard Hardacre. Cllr Zachary Norman.

---

## **RECOMMENDATION – PLANNING PERMISSION WITH CONDITIONS**

---

### **Description of Development**

Hybrid Application. Outline Planning Application for Interchange 55 comprising predominantly industrial (B2 use) and warehousing (B8 use) and prospective offices, research and light industry (E(g) (i, ii, iii) uses) buildings. Full Planning Application for access to the development and associated landscaping.

### **Location**

Land To The South Of Thompson And Morgan, Poplar Lane, Sproughton, Suffolk

**Expiry Date:** 17/12/2021

**Application Type:** OUT - Outline Planning Application

**Development Type:** Major Large Scale - Manu/Ind/Storg/Wareh

**Applicant:** Poplar Holdings Ltd & Building Partnerships Ltd

**Agent:** Miss Maureen Darrie

**Parish:** Sproughton

**Site Area:** 7.98 hectares

**Details of Previous Committee / Resolutions and any member site visit:** None

**Has a Committee Call In request been received from a Council Member (Appendix 1):** No

**Has the application been subject to Pre-Application Advice:** No

---

## **PART ONE – REASON FOR REFERENCE TO COMMITTEE**

---

The application is referred to committee for the following reason/s: The development involves the erection of industrial building/s with a gross floor space exceeding 3,750sqm.

---

## **PART TWO – POLICIES AND CONSULTATION SUMMARY**

---

### **Summary of Policies**

CN01 - Design Standards

CS01 - Applying the presumption in Favour of Sustainable Development in Babergh

---

CLASSIFICATION: Official

CS02 - Settlement Pattern Policy  
CS03 - Strategy for Growth and Development  
CS07 - Strategic Site Allocation - Babergh Ipswich Fringe  
CS13 - Renewable / Low Carbon Energy  
CS15 - Implementing Sustainable Development  
EM01 - General Employment  
TP15 - Parking Standards - New Development

### **Neighbourhood Plan Status**

This application site is within a Neighbourhood Plan Area.

The Neighbourhood Plan is currently at:-

Stage 3: Pre-submission publicity and consultation

Accordingly, the Neighbourhood Plan has limited weight.

### **Consultations and Representations**

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

#### **A: Summary of Consultations**

##### **Parish Council**

##### **Sproughton Parish Council**

We object to this application for the reasons set out below but agree in principle that this site is a good site for employment and commercial use.

We agree that a buffer surrounds the residential area but consider it is insufficient as the present plan is presented. Our recommendation to set back warehouses further from the residential areas than the 15m specified in the original consultation appears to have been ignored. We believe this buffer should be wider and densely greener. We recognise that the outline planning application shows more greenery along the buffer and the inclusion of a Gabion Wall, but details of the planting and the Gabion Wall is unclear and therefore its benefit as a visual screen is not guaranteed by this application and significant concern has been expressed to the Parish Council by residents here.

We would therefore propose that the warehouses are set back further from the existing residential area and more details of the Gabion Wall height and planting associated with the wall and buffer area is provided. We would also ask that what is planted between the Warehouses and present Residential area should include trees of sufficient height once mature to visually screen the warehouses.

We are also concerned about the wildlife access around the site, through the site and into and out of the site because of the important wildlife route from the Copdock Interchange and underpass under the A14 linking the countryside to the South into three locally allocated wildlife areas, Chantry Park County Wildlife site, The SEP Nature Area/LNR and The River Gipping County Wildlife Site (downstream of the SEP Park). These are valuable community wildlife sites providing truly nature rich recreational and leisure areas for the expanding population of Ipswich that need support and protection to maintain the health of their diverse

ecosystem. These nature sites have endured and developed because the wide green Chantry Vale and River Valley have provided wildlife with an attractive migratory link to the wider countryside promoting genetic exchange between wildlife populations to prevent harmful interbreeding ensuring healthy wildlife colonies. These wildlife links need to be maintained otherwise significant long term harm will be done to these locally designated wildlife areas that are of significant benefit to the developing Ipswich area and support some rare and endangered species.

The applicants Ecological Assessment identifies the cycle path running beside the London Road as green infrastructure linking Chantry Park with the wider countryside via the Copdock interchange and tunnels. However this is too long and exposed for larger mammals like deer that need secluded green routes with undergrowth and bramble cover adequate for them to move amongst unseen and 'stepping stone' habitat areas along the corridor to rest and hide during the day. The Assessment also only considers species found resident on the site and not the more important occasional or seasonal transit of the species that need to move between the Wildlife Sites and the wider countryside. The assessment suggests biodiversity gains but is misleading as this does not consider the greater potential biodiversity harm that may be done by restricting the movement of species into and out of the Wildlife Sites.

The Havens Gateway project which set out the development proposals for Essex and Suffolk identified this need many years ago and proposed a Country Park in Chantry Vale and a green link across what is now the I55 Site and the Wolsey Grange 1 site into Hadleigh Road in Chantry Vale to ensure the health and vitality of these important wildlife sites for Ipswich. But this seems to be being ignored.

Instead, Along with Wolsey Grange 1 and the proposed Wolsey Grange 2 application half of the wildlife routes into the Chantry Vale particularly those from the Belstead Brook Valley area are being stifled by development leaving some narrow pathways also suitable for wildlife routes. To maintain wildlife routes suitable for some of the larger species it is important that access to these wildlife routes is inviting and as green as possible

The buffer around the existing residential area on the old London Road therefore becomes important as a quiet isolated wildlife route which hopefully will feed into a SUDs basin in WG1 that can act as a Stepping Stone Habitat area. But it pinches quite tightly at its northern end and appears to be fenced off there preventing the likes of deer from taking this route further into the WG1 SUDs area.

We would recommend more width to the buffer at this point and fencing and ground cover that will allow and attract larger mammal movements through the developed area with a realistic green vegetated wildlife route into and out of the buffer strip both to the Copdock interchange underpass area and Belstead Brook Valley and towards the inner wildlife areas.

It is noted that the application now proposes HGV/Vehicle access to the Thompson and Morgan site through the I 55 Site. The existing Copdock Interchange Retail Park has two access routes but only one exit route and all of those must go around the smaller roundabout at the junction of the main Tesco entrance. This is already an extremely congested roundabout and the addition of the I 55 site traffic plus all the Thompson and Morgan Traffic, HGV's and smaller vehicles into and out of both these sites will significantly overload this roundabout. This impact is likely to be even more severe on the smaller Park and Ride roundabout which will be very tight for HGV's. Then add to this the three vacant sites on the Retail Park which will generate additional traffic when re-occupied and the addition of a new Macdonald's that will add even more traffic.

We would propose that this site should not progress without improvements to both these roundabouts being implemented prior to any construction work due to the additional congestion that even site construction will create.

The Copdock (I 55) roundabout/interchange system is also well known to be overburdened and congested as is the A1214 J/W Scrivener Drive roundabout as a satellite of the interchange system. Improvements are required desperately and are a high local priority that we understand are proposed. We would recommend that this site was timed to avoid any major construction work on the rebuilding of the interchange as both projects running in tandem would put too much stress on the road network and the tolerance of road users. In preference the Copdock interchange improvements should be completed before adding additional demand on the road network with this application.

This site sits in the general area of significant archaeological finds. The ancient landscape places this site on a ridge over the line of the old Roman Pye Road close to the area where it would have turned North towards Norwich through what is now Sproughton village. It is a likely point along the road for Roman development and sometime after evolved the Hamlet of Felstead with its own Church or Chapel which disappeared several hundred years ago after having existed for many centuries. The exact position and extent of the potential archaeological evidence is unknown so we believe careful archaeological examination of the site before planning approval and certainly before undertaking any groundwork should be a priority.

Whereas the visual impact of 10 and 15 m warehouses may be limited these buildings will still be visible from some open countryside areas. We would ask that provision for layered or block green or blue sky type camouflage/visual bulk breakdown in the buildings cladding is incorporated to reduce their visual impact on the surrounding countryside or better still living green wall planting.

We would ask that provision for extensive tree, shrubbery and other green infrastructure like green walls and hedgerow dividers, particularly pollinator supporting planting is incorporated around the development. To aid with the Queens Canopy aspirations for a new tree per person to regreen and to regenerate the natural environment for future generations.

No mention is made of energy aspirations of the development. We would ask for some commitment to the use of extensive solar power on roofing, heat pumps for warehouse/office heating and battery systems to store power for overnight use. There is also the opportunity for a Grey water harvesting and/or Rainwater collection system to irrigate the greened areas of the site. An ideal commitment would be to achieve a development harvesting sufficient renewable energy for its own lighting and heating.

### **Copdock and Washbrook Parish Council**

With regards to Highways & Movement:

The development site has the proposal to increase a maximum amount of parking at any one time of 469 spaces + 39 HGV. Over the space of a 10-hour operating period this could increase traffic movements by 1876 vehicles + deliveries.

Access to and from the proposed new development. The existing access road and roundabout to the A1214 to Tesco's is already overloaded by users especially at peak times and certainly Christmas time. With HGV's now joining the queue to get out of the retail site will be even worse.

What also has to be taken into account is the future construction of the McDonalds restaurant which obtained planning permission. The old Toys-R-Us building which unoccupied at present will create more traffic use of the access road together with the opening up of the old Mothercare building.

## Pinewood Parish Council

Traffic from Stoke Park, Belstead Hills and the small local villages passes through Pinewood in order to access the wider road network. A number of commercial developments have been built in the last few years as well as One, the sixth form college which now has up to 2,000 students. In addition, BDC has also granted planning permission to Taylor Wimpey for 475 dwellings, an application for a further 750 is in the pipeline. BDC has granted planning permission for a 65 bed care home with an additional 20 dwellings on the Belstead House site and 155 on the Belstead Meadows site. Some of these developments have already contributed to increased congestion on Scrivener Drive and the access points, including Sprites Lane, to the wider road network, those in the pipeline will cause further difficulties for residents and this proposal will add to further congestion. Pinewood Parish Council has asked BDC to consider the wider implications of a number of these developments on these matters when at the planning stage, but so far it has refused to do so. We ask that this is not the case in this instance.

It is proposed that the greatest proportion of the site will be for B8 warehousing and B2 light industrial use. This is the issue that gives us the greatest cause for concern for the following reasons:

**Traffic and Road Use** It appears that access to the site will be from the A1214 Tesco roundabout, using traffic capacity already consented within the Wolsey Grange development, passing round the back of Tesco and entering the site via a newly designed and constructed roundabout at the Park and Ride site. However, it is likely that traffic coming from Ipswich and the A1071 will access the site via the Tesco/ Scrivener Drive roundabout.

The Travel Plan confirms that all vehicles will exit the site via the Park and Ride roundabout and onto the strategic road network via the Scrivener Drive roundabout.

Therefore, both entering and exiting traffic will place increased pressure on the Scrivener Drive roundabout which is one of the main access points to the wider road network for residents of Pinewood, Belstead and Stoke Park. The Aldi store and One Sixth form College have already caused a great increase in traffic to Scrivener Drive. Traffic already builds up to gridlock proportions whenever there is a problem on the strategic road network, causing delay and frustration to these residents.

The Tesco site already has a number of retail and fast food outlets as well as a large Filling Station and a 24-hour McDonalds will be constructed soon. There are 2 large retail premises, formerly Toys are Us and Mothercare, which are presently empty but will no doubt in the future come back into use. The road from the Park and Ride roundabout to the Scrivener Drive roundabout, which serves all these premises and shoppers is of limited length and would soon become congested at peak times of shopping.

The Travel Plan asserts that the A1214 has a high traffic capacity and can accommodate a large proportion of HGVs. We would claim that it has already reached that capacity, the person who wrote this has obviously not seen the traffic queues between Scrivener Drive and Copdock Mill Interchange at any given hour of the day. Rush hour now seems to begin at mid-afternoon.

The Travel Plan also makes the assumption that workers travelling to the site will find it easy to walk or cycle to the site. It states that the topography is undulating and that it is possible to travel to most parts of Ipswich in 25 minutes by cycle. It may appear undulating when travelling by car, but the town of Ipswich sits in a valley and when travelling from one side to the other it is necessary to negotiate hills of varying steepness. Consequently, despite there being a number of cycle lanes on town routes, cycling is not a widespread activity for travel to work. It is doubtful that the writer of the Travel Plan has actually cycled many of the routes. Therefore, this cannot be considered as a viable option to reduce car use in this case.

Conclusion

Increased traffic movements, many of which will be of HGVs, will result in further congestion and gridlock for the residents of Pinewood and other residential settlements in the area.

The Travel Plan states at present there are 29 parking spaces on the site, the proposed number of 257 will mean an increase of 228 so workers and visitors to the site will increase daily traffic movements greatly.

The majority of units will be for warehousing, storage or distribution, 17347.6sqm compared to 800sqm for offices. This indicates that most vehicular movements will be HGVs and other large vehicles, the site is likely to be operating for 24/7 so the potential implications for the residents of Pinewood are significant in terms of noise and extra traffic on our already congested local road network.

The Design Access statement 3:10 states that the build completion by 2025 is not unreasonable. All potential road improvements will not be in place by then. Even if improvements to Copdock Interchange are approved, funding will not be available until 2025 at the earliest and completion will not be until 2020 at the earliest.

We contend that this application is for a site that is not suitable for its intended use.

The local road system is already overloaded and there are concerns that the strategic road network will not be able to cope with the increased traffic load.

There are already a number of housing developments in close proximity to the site and more are planned. There are already a number of such sites already planned or in operation on the fringe of Ipswich, none of them appear to have the limitations we have described in this submission.

Pinewood Parish Council therefore wishes to register its objection to this application

### **National Consultee**

Natural England: No objections

Historic England: No comments

National Highways: Recommends conditions to agree design details relating to the required scheme for traffic signs queues likely on road ahead warning signage on the A14 Western approach to Copdock Interchange

### **County Council Responses**

Fire and Rescue: Recommends condition relating to fire hydrants

Developer Contributions: does not have any requirements for developer contributions in relation to this application.

Flood and Water Officer: Recommends approval subject to conditions

Archaeological Officer: The site has been subject to archaeological evaluation that includes Desk-Based Assessment, Geophysical Survey and Archaeological Trial-Trenching (reports from GHC Archaeology and Heritage submitted in support of the application).

The works have confirmed that the north-eastern area of the proposed development will affect an historic cemetery that is almost certainly associated with the site of the 'lost' medieval chapel of Felchurch. The

cemetery is present within a 'dogleg' in the field boundary of a larger field that is called 'Chapel' on the 1837 tithe map. References to the chapel appear in medieval documents and it was likely linked to medieval occupation and activity that has been recorded around Poplar Lane as part of the Wolsey Grange development. Given the potential for the chapel site and burial ground to be present (as set out in our letter of 30th November 2021), Suffolk County Council Archaeological Service (SCCAS) advised that trial trenching should be undertaken ahead of a planning decision, in order to confirm whether there was a chapel and cemetery on the site, and to establish the quality, level of survival, extent and significance of any remains.

The field evaluation commissioned by the applicant has addressed these questions, within the parameters of a reasonably targeted sample that gave coverage across the potential area of the church where it lies within the proposed development area. The report confirms that there are burials present within an area in the north-eastern corner of the site that appears to be enclosed by ditches, which is consistent with the map evidence.

Seven burials were identified within a 'churchyard soil' – a soil deposit that builds up in an active churchyard - in evaluation trench 2. The burials recorded were at the top of this soil, where it was first encountered, and there is potential for stratified layers of burials beneath. The full depth of the sequence of burials was not investigated in the trenches, in order to minimise damage to human remains, and there may be a large number of burials in the area. The skeletal remains were shown to be generally well preserved and in good condition.

Regarding the chapel itself, traces of a building were limited to a deposit of tile found within a ditch or other feature (in trench 16), and to finds of tile in other trenches in the vicinity (identified by CFA Archaeology specialists as tile that post-dates the 13th century). A formless concentration of flint pebbles was also observed on the site visit, although this may have been a natural occurrence. Within the evaluation, and the preceding geophysical survey, there therefore did not appear to be clear traces of structural remains relating to a church, although the tile likely does represent demolition material. It would not be unreasonable to suggest that the church site itself may have been impacted by ploughing and agriculture, or that there are remains present of a smaller scale such that they would only be revealed through full excavation of the site - or even that it was within another 'dogleg' area observed on the tithe map adjacent to the one which falls into the site.

To the south of the ditch which appears to be a boundary ditch for the cemetery area, features included a pit in evaluation trench 6 included a loom weight and what appeared to be fragments of a kiln lining, which is indicative of late-Saxon occupation in the area. The area of the burial ground and this area to the south of it comprise the area of interest within the proposed development area.

Across the rest of the site, there were a few sparse remains recorded in the trial trenching, and we would not advise that they require further mitigation work.

### **Relevant Policy and SCCAS Position**

Firstly, we highlight that any disturbance of burials would need a licence from the Ministry of Justice, which is a separate consenting process.

In relation to the planning process, we advise that the site constitutes a significant non-designated heritage asset, as a 'lost' chapel/cemetery site within the hinterland of Ipswich, with the site currently appreciable as occupying a rise over the small valley which runs through the site. The site also has high archaeological research value, as it would provide an example of a cemetery group that could contribute to bioarchaeological questions raised in the regional research framework for East Anglia,<sup>1</sup> and one that could potentially contribute a case study for broader questions.

The National Planning Policy Framework (NPPF), footnote 68, highlights that 'Non designated heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments should be considered subject to the policies for designated assets.'

The site has not been tested against criteria for designation through a formal process. However, whilst there is latent scientific value in a group of human remains, the criteria for designation of medieval cemetery sites acknowledges that there are a high number of known medieval burial sites and includes the following points which are intended to guide the targeting of sites for scheduling (Historic England 2018, Commemorative and Funerary Scheduling Selection Guide2 p. 24):

- Some examples which ceased to be used for burials at the time of the dispersal of their populations have been scheduled within the designation of larger areas of deserted medieval settlement or the scheduling of ruined church sites – this would not be applicable in this case.
- Newly identified mass burial sites would almost certainly meet the standard for scheduling (meaning large numbers of burials associated with plague or battle, for example, which is not the expected case here).

Given the more ephemeral evidence for the church identified within a reasonably targeted evaluation, SCCAS would not object to the scheme on the grounds of a need to preserve in situ remains that are demonstrably of equivalence to designated sites of national importance.

However, we advise that the site is of local/regional significance and importance, and paragraph 203 of the NPPF is relevant. This says that

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

Policy LP21 of the emerging Local Plan (November 2021) is also relevant and highlights that harm to heritage assets should be avoided in the first instance.

SCCAS advise that an optimum approach to managing remains on the site would be one that preserves it in situ as an open space, which would minimise disturbance and allow some recognition and commemoration of the place of Felchurch. In a housing scheme along different lines to the proposed development, for example, this could be achieved through preservation within a public amenity area, with some interpretative information.

The current plans for employment/office/industrial/warehouse use of the site involve construction over the area of archaeological interest (part of Block 2 buildings, overflow parking, potential access, and parking bays). We advise that decision makers should weigh up the economic and public benefits of the development, and the viability of the scheme as it is designed, against the impact on heritage assets (archaeological remains). Should consent be granted, the use of appropriate conditions to secure archaeological mitigation would be compliant with national and local policy. Therefore, we advise that in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

There are potential mitigation options available for the scheme which could be secured through suitably worded conditions. These are full archaeological investigation of the site or, potentially, exploration as to the possibility of preserving remains within the parameters of construction design. Both approaches should also be supported by provision of interpretation on the site in design, or other public outreach.

## **Archaeological Requirements**



### *Excavation*

A programme of excavation will allow investigation and recording of the site prior to impacts from development. The costs and timescales of appropriate, robust, and proportionate excavation, analysis, research, archiving, and dissemination of information to enhance public understanding for cemetery sites can be high. We would advise early consideration of costs, timescales, and project design, and appreciate that the applicant's archaeological consultant is advising in this regard. Provision/contingency should be made for large numbers of burials.

A programme of excavation would require a research design proportionate to the significance of the remains. The burials would have special archaeological significance and interest as a medieval group which has not been disturbed by later burial (as is often the case with parish churchyards, for example). A programme of investigation should be informed by the East Anglian Regional Research Framework, and bioarchaeological research frameworks (<https://researchframeworks.org/>). As an assemblage from a rural site, there would be scope for comparison to the medieval urban cemetery excavated at Stoke Quay, within Ipswich (although the population at Felchurch would likely have been smaller).

Ground Penetrating Radar may be applicable as a further evaluation tool to seek to establish depths/numbers of burials and inform a mitigation strategy, subject to specialist advice on the suitability of the site for the particular technique.

The chapel may also have had older origins (the name has been interpreted as a corruption of 'vielle' or 'old' church), borne out by the archaeological evidence for the use of pillow stones noted in the evaluation report, and by the identification of what appears to be Early Medieval/Late Saxon occupation to the south of the cemetery area. The identified area of interest also covers this area of occupation to the south of the cemetery. Together, mitigation should reflect the potential of evidence from the site to contribute to our understanding of the earlier medieval/late Saxon period in the area. The sites are at the top of the higher ground over the small valley that runs through the site, in what would likely have been a prominent location in the landscape.

### *Preservation in Situ*

With regards to the feasibility of preservation within the scheme, we have some concerns that burials are relatively shallow in places and hence vulnerable to development over them, and also that the site occupies and can be appreciated as a slightly raised area (partly perhaps due to the burial soil, and also a shorter history of ploughing), which may present some challenges to burial and preservation.

However, we understand from the applicant's agent that the intended lighter weight garaging/single-storey buildings for block 2 would enable some flexibility for a scheme to raise the ground whilst remaining within the parameters of proposed building heights, which could offer the potential to contain services and foundations within made ground.

As designs/reserved matters applications are progressed, we would need to see the development design over the archaeological remains, along with detailed engineering information. We would also require further information on the depths of archaeological remains in relation to site topography (enhanced illustration in the evaluation report would be ideal) to fully appreciate the size of buffer needed, and to understand the absolute levels of impacts. We advise that the approach would need careful consideration and design to ensure that remains are not damaged through either construction or compaction, as we would seek to preserve skeletal remains in their current condition. There are options that could be explored such as a supported slab or raft. We would also seek to ensure controls on proposed landscaping and preparation for the road and parking areas.

### ***Appropriate Condition Wording***

We recommend the appended suite of conditions (see Appendix), in order to allow the development of an appropriate mitigation strategy at an appropriate point. The conditions would cover excavation and mitigation, and preservation in situ if appropriate, allowing flexibility as design progresses. We would be happy to discuss tailored condition wording and would also be happy to agree the area of the site that should be subject to mitigation, so that it can be referred to in the condition wording. This will focus on the area of the medieval burial ground (northwards of evaluation trench 2 and eastwards of evaluation trench 10), and on the area of Early Medieval/Saxon occupation to the south of it (trenches 2,8,9, 6 and 7 and eastwards).

## **Local Highway Authority**

### **Response 18/08/2022**

Further to the submission of additional plans and documents and subject to confirmation from National Highways that the impact upon the Copdock Interchange (A14 J55) is acceptable (that we understand is imminent), we are satisfied with the proposal subject to recommended planning conditions and a Section 106 contribution as detailed below.

With regard to the traffic impact, we do have some outstanding issues around the methodology in the submitted modelling. However, we are now satisfied that it represents a robust assessment of the *impact* upon the junctions of greatest concern. It is clear from the submitted junction modelling that a significant impact upon the Scrivener Drive/ A1214 roundabout results from the proposal (above the baseline) in both the AM and PM peaks on multiple arms of the roundabout in its current and future (improved) form.

Section 106 Contributions: In order for the proposal to be acceptable to the Highway Authority, we require a S106 contribution towards sustainable travel improvements on the A1214 London Road corridor to further encourage the use of sustainable modes of travel and mitigate the impact of the development on the local highway network. This is identified in the forthcoming Ipswich Transport Strategy and contributions will be sought from this and other large developments in this area to provide a significant improvement scheme.

A S106 contribution of £124,875 (based upon £5 per sq. metre of floor space) is required.

Without this contribution, the proposal would not be in accordance with NPPF 111 due to a severe cumulative impact upon the highway network.

We feel that this request is fully in accordance with NPPF paras 57, 110 and 112 and the relevant local policies as detailed below:

The National Planning Policy Framework (NPPF) [July 2021] 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.

In terms of priorities for walking and cycling and promoting sustainable transport modes, the NPPF paragraph 110, specifies that in assessing specific applications for development, it should be ensured 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.

Whilst paragraph 112 specifies that applications for development should:

- a) 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;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

Babergh Core Strategy (2014) Policy CS7 identifies the need for: 'good links and / or the enhancement of existing links for pedestrians and cyclists to local shops and services, schools, employment areas, and public transport routes and services.'

### **Subsequent response 31/10/2022**

Further to our response dated 18/08/22, discussions with the applicant and their representatives have taken place regarding the Section 106 contribution requested by the Highway Authority for sustainable travel improvements.

This request was made to mitigate the impact upon the local highway network of this proposal by encouraging modal shift in line with the ISPA (Ipswich Strategic Plan Area) mitigation approach regarding travel choices (reducing private vehicle use). Whilst in most circumstances, we would look to secure junction capacity improvements where the impact upon a junction is unacceptable, in this instance the junction in question (A1214, Scrivener Drive roundabout) is already subject to a secured capacity improvement as part of the Wolsey Grange highway improvement measures.

The applicant has not accepted the Section 106 contribution request and following further review and consideration, it is accepted that we are not in a position to maintain our objection to the proposal without the contribution. However, we have recommended a further planning condition overleaf regarding the aforementioned junction improvement to ensure that it is delivered at an appropriate time.

It is noted that the proposal will be providing a significant investment in off-site highway improvements that will benefit users of the proposal and others. This will also encourage some modal shift and may also improve the viability of the existing park and ride bus service.

Additional recommended planning condition:

Condition: Prior to the occupation of 25% of the hereby permitted development, the off-site highway improvements to the A1214/ Scrivener Drive/ Tesco roundabout as indicatively shown on Drawing No. 5244 SK-26 Rev C (included in the approved planning documents submitted for planning permission B/15/00993) shall be completed in accordance with details that have previously been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the necessary highway improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway capacity and safety.

Note: These improvements are secured as part of planning permission B/15/00993 (Wolsey Grange) and are due to provided prior to occupation of the 300th dwelling. This condition will only need to be complied with if not completed by the Wolsey Grange development prior to 25% occupation of this proposal.

### **Internal Consultee Responses**

Environmental Protection- land contamination: No objection and no requirements for further investigations.

Environmental Protection – air quality: Based on the report of Create Consulting and our own knowledge of the site I am satisfied that the development is unlikely to result in a significant adverse impact on air quality in the Babergh district nor is it likely to result in an exceedance of air quality objectives at, and around, the development site

Landscapes: The site area is within the Gipping Valley Special Landscape Area and sits within the Babergh Ipswich Fringe (CS7) Strategic Site Allocation identified in the Babergh Local Plan 2011-2031- Core Strategy and Policies (2014). We have reviewed the submitted LVIA and considered to be in line with the standards set out in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). We are satisfied with the mitigation recommendations and receptors identified and the identified viewpoints.

We welcome the proposed landscape strategy which has reflected the mitigation measures established in the LVIA; – Retention of the existing landscape features which are strategically important within the wider landscape context. – Proposed 15 metre zone of landform and native woodland and shrub planting along the western (A14) boundary of the site to mitigate the impact of the development in particular in wider views from the west. – Proposed 15 metre set back zone containing native woodland and shrub planting along the southern (London Road) boundary of the site, extending along the northern boundaries of the existing residential properties on London Road. – Careful choice of materials - building elevations to be clad using non reflective materials with recessive matt finishes. Natural lighter and recessive colours will be used whilst stronger brighter colours and tones will be avoided. – Follow the principles set out in the ecological assessment of the site, the landscape strategy will enhance biodiversity. – Integration of the landscape, ecology and sustainable urban drainage.

Previous concerns over the height of the proposed buildings and the potential impact in the skyline in particular to the north of the site where buildings sits on higher ground, can be reflected on Viewpoints 7, 8 10, 12 wireframe models. The current building height for Block 1 and Block 3 is 15m. It is considered that a reduction in height will help to get the proposal absorbed by the existing built form. Visual impact of Blocks 2,4,5 and 6 is less of a concern as these are 10m high and sit on lower ground. We would recommend that the height for Block 1 and Block 3 is reviewed to reduce its impact in the landscape and deliver a scheme that blends better in the landscape. Effort has been made to address the landscape comments made at pre-application stage with regards SuDS, buffer zones and tree planting. We acknowledge the constraint that the existing water main/easement corridor has on the proposal and the impact this has on the proposed buffer zone along the western boundary. The proposed landscaping strategy along the access road to the development is acceptable. We welcome the addition of rain gardens in the outline proposal. Rain gardens should be planted with a wide range of species appropriate to the conditions of each rain garden. Marginal planting might not be the best choice if these areas are anticipated to be dry most of the time. A mix of drought tolerant plants and plants that can withstand occasional flooding will be more suitable. The proposed infiltration basins should be improved by having a range of gradients to create a natural landform - 1 in 4 slopes preferred - and by diversifying the planting to include trees, woody shrubs, and wildflower mixes to provide for biodiversity and habitat creation.

Overall, we consider that the principles shown in the outline landscape proposal have taken regard of Policy CR04 (development in Special Landscape Areas). The introduction of industrial development will create a more urban character, but with the implementation of the proposed landscape mitigation alongside a reduction of building height to softening the skyline, the proposed development could be accommodated and its landscape and visual impact reduced to acceptable levels. The commercial buildings would not be

fully screened but would be viewed in conjunction with trees and integrated with Ipswich's western fridge. Place Services is a traded service of Essex County Council The principles of the landscape proposal would also contribute to the creation of woodland and to biodiversity enhancement at the same time as retaining and enhancing the boundary vegetation. Recommendations If minded for approval, we would recommend the following: – A reduction in height for Block 1 and Block 3. – Improvements to the proposed infiltration basins by diversifying the planting to include trees, woody shrubs, and wildflower mixes to provide for biodiversity and habitat creation. – We would recommend the use of permeable paving on car park areas to reduce water run-off. – Additional native species hedge planting to fill in the gaps along the northern boundary. – The proposed planting scheme should be of native species to reflect the landscape character type and to deliver a varied tree planting palette with long life expectancy trees. A detailed landscape plan, landscape specification (including existing vegetation to be removed and retained), a proposed hard and soft landscaping plan, a boundary treatment plan, SuDS plan and landscape management plan are submitted as part of any reserved matters applications. We recommend the following conditions for consideration:

Environmental Protection- sustainability: No objections recommend conditions relating to a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development.

Heritage: No comments

Arboricultural Officer: I have no objection to this application subject to it being undertaken in accordance with the measures outlined in the accompanying arboricultural report. Although a small number of trees are proposed for removal they are of limited amenity value and/or poor condition and their loss will have negligible impact upon the character of the local area

Environmental Protection – noise and odours:

Environmental Protection have the following concerns.

- Noise from vehicle movements, FLT's Container lift etc may cause loss of amenity or nuisance
- Noise from the handling of materials externally may cause loss of amenity or nuisance
- Noise, Fumes, smoke and odours from a B2 activity may cause loss of amenity or nuisance
- Noise from any externally mounted plant such as air handling units, extract ventilation, refrigeration etc may cause loss of amenity or nuisance
- Lighting may cause loss of amenity or cause nuisance

The applicant has indicated that hours of operation are not relevant to this application. I disagree that hours are not relevant for heavy industrial uses and distribution activities which have a potential high impact depending on the actual use within the B2 and B8 use classes. It is therefore assumed that the applicant is applying for 24 hour use at the site which, as identified, is in close proximity to existing housing and a significant number of new housing currently under construction.

A noise assessment has been carried out by Adrian James Acoustics limited. The assessment is a background noise level survey but in the absence of any actual known occupant for the proposed business units at this stage, a full BS4142 assessment has not been possible. The report suggests setting noise limits using the background noise levels for day and night time hours. The established background levels are as follows.

- Daytime (07:00hrs – 23:00hrs): 42dB LA90,1hr
- Night-time (23.00hr – 07:00hrs): 33dB LA90,15min

I have no objection in principle to setting noise limits for the site. The report proposes + 5 dB above background noise levels, however, there is difficulty with this approach due to there being multiple units

that could potentially be occupied by different businesses. If each business is set a noise level of +5dB above background there will be noise creep (if each business used the full noise allowance) as each unit is occupied which will take the overall noise rating level to +10dB or more above background which BS4142 considers to cause a significant adverse impact on residential dwellings. In addition a +5dB is the point at which the onset of an adverse impacts begins. While this is may be acceptable in quiet rural areas where background levels are very low, in higher noise environments most local authorities to ensure that noise from commercial activities does not exceed background and in some cases require noise to be below background (this is also to minimise noise creep slowly raising overall ambient noise levels, which ultimately can become a risk to health of long term occupants).

Setting levels by planning condition needs to be enforceable as well as practical to provide the protection to off-site receptors. A single noise limit for the site as a whole is unlikely to be practical in its enforceability and difficult for any overall site management company to control. Therefore an appropriate effective condition will need to be agreed with the applicant.

Concerns regarding potential light and fumes/odour effects, these matters can be mitigated via conditions. I therefore have no objection in principle subject Conditions.

Place services: Ecology – No objection subject to conditions.

### **Other Consultees**

Anglian Water: There is sewerage capacity for this development

East Suffolk Drainage Board: I am pleased to see that initial testing shows that a drainage strategy reliant on infiltration is likely to be achievable on the proposed development. If for any reason a strategy wholly reliant on infiltration does not prove viable and a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

Ipswich Borough Council:

#### Employment Need

Information has been provided in the Planning Statement of this outline application that sets out the demand and availability of employment land in the area. There has been a significant level of employment-related commitments, commencements and completions in Suffolk over recent years, particularly along the A14 corridor. This includes developments at the Eastern Gateway (Sproughton), the Port One Business Park (Great Blakenham) and Gateway 14 (Stowmarket).

The Ipswich Economic Area Sector Needs Assessment (2017) identified a combined need for approximately 12.3ha within Babergh and Mid Suffolk District Councils from 2014 – 2036. The identified commitments and developments are likely to substantially exceed the identified land requirement of 12.3ha.

The Council has no objection to the identified over-delivery of employment land in these two districts and supports sustainable economic growth in the wider Ipswich Strategic Planning Area (ISPA). However, it is important that individual proposals, such as this application, consider whether there are more suitable sites in adjoining authorities that may be more sustainably located. As this site is on the Ipswich Fringe, it is recommended that the work undertaken within the Planning Statement considers sites in Ipswich Borough.

This would ensure both that the most sustainable sites are brought forward, and that economic growth is distributed more effectively over the wider ISPA to achieve the sustainable growth of the wider area.

To achieve this, in this case, it is requested that the applicant considers whether the following sites in Ipswich Borough would be suitable for the proposal in question:

Land at Bramford Road 2.26ha  
Former British Energy Site, Raeburn Road South 4.18ha  
Land north of Whitton Lane 6.93ha  
Airport Farm Kennels, South of Ravenswood 7.37ha

Details of the sites above can be found in the adopted Ipswich Local Plan (2017) Site Allocations and Policies Development Plan Document<sup>1</sup>.

In addition, there are also plots available at the Eastern Gateway (Sproughton Enterprise Park) on Sproughton Road within Babergh District. Chapter 11 'Making Effective Use of Land' of the NPPF (2021) requires planning decisions to support the development of under-utilised land and for authorities to take a proactive role in identifying and helping bring forward land that may be suitable for meeting development needs. Similarly, although only limited weight can be placed upon it, the emerging BMSDC Local Plan Policy SP05 requires prioritisation to be given to development on brownfield previously developed sites and for applicants to demonstrate that development cannot be accommodated on existing employment sites. Consequently, it needs to be demonstrated that the applicant has considered all of the available alternative sites, including brownfield land and sites within Ipswich Borough.

#### Transport & Air Quality

To understand the cumulative impact on the highway network of the combined growth proposed through the draft updated Local Plans for Ipswich, Suffolk Coastal Area, Babergh and Mid Suffolk to 2036, assessments have been undertaken using the Suffolk County Transport Model (SCTM). A modelling report published in January 2019 identified that '...the built up area of the Ipswich network comes under particular strain, [and] that in a number of locations the ability to deliver road capacity improvements is highly constrained by available space and could also move the problem 'further down the road'. In addition, Ipswich has four designated Air Quality Management Areas (AQMAS) within the central area of Ipswich, as a result of pollutants from road traffic.

In response, Suffolk County Council prepared a Transport Mitigation Strategy<sup>3</sup> for the ISPA. To achieve the aims of the ISPA Transport Mitigation Strategy and address the issues of growth on Ipswich, it is critical that effective alternatives to private car are offered to people to ensure that sustainable travel modes are prioritised. Page 86 of the ISPA Transport Mitigation Strategy states that one of the implementation measures is to "identify improvements to current park & ride services..." The proposal would involve the loss of 23 park and ride spaces at the Copdock Park and Ride. The loss of these 23 spaces could undermine the ability of this part of the ISPA Transport Mitigation Strategy to be delivered and have a significant adverse impact on the highway network of Ipswich. The loss of these spaces is not supported by Ipswich Borough Council.

With regards to air quality issues, it is noted that SCC Highways have concerns over the adequacy of the Transport Assessment and that it does not adequately assess the impact of the development on the local highway network. Since the current TA is deemed unacceptable, the Air Quality Assessment provided by Create Consulting Engineers should be reviewed and updated once the TA has been updated to the satisfaction of SCC Highways. I would be grateful if IBC could be consulted on any updated Air Quality Assessment so we can comment on the proposal further.

Having reviewed the air quality assessment submitted in support of this proposal, IBC are not sufficiently reassured that the development will not result in unacceptable impacts to air quality in Ipswich. In particular, confirmation is sought upon:

- o The impact of the proposal on diffusion tube site, DT18. IBC are very close to exceeding the annual mean objective level at this site which could result in the declaration of a new AQMA.
- o The impact of the proposal on air quality at the Hadleigh/London Road junction. o IBC are aware that para 5.8 of the AQ assessment states that the traffic loadings associated with the overall Wolsey Grange scheme are also accounted for in full in the modelling scenarios but IBC requires assurance that the sites do not result in unacceptable impacts, particularly to the aforementioned locations.
- o The HDV and LDV flows within/adjacent to IBC's AQMAs and elsewhere.

IBC strongly recommend that in order to avoid detriment to air quality within Ipswich, that the routing strategy for construction vehicles does not pass through central Ipswich. IBC would suggest that a condition is imposed requiring that a Construction Environmental Management Plan is submitted to BMSDC and also to IBC's LPA and Environmental Health Departments for agreement in writing prior to works commencing. In addition, IBC would encourage that BMSDC require a travel plan for construction workers accessing the site.

IBC would suggest that a condition is imposed requiring the Construction Environment Management Plan to include the mitigation measures detailed in table 6.5 of the Air Quality Assessment. Of particular concern for Ipswich will be the routing strategy, but there is also the possibility for residents to be impacted from dust from construction vehicle track-out if the suggested mitigation is not implemented.

IBC support the comments made by SCC Highways relating to pedestrian and cycle access to the site and the requirement for the internal layout of the site to provide high quality segregated pedestrian (including vulnerable road users) and cycle routes.

EV charging and secure cycle and powered two-wheel storage should be provided in accordance with the Suffolk Guidance for Parking (2019).

Ipswich Borough Council objects to the loss of the 23 park and ride spaces that would result from this proposal due to the impact that this would have on the effectiveness of the ISPA Transport Mitigation Strategy, and subsequent detrimental effect this would have on the highway network and air quality in Ipswich. In addition, it is requested that the applicant identifies whether alternative sites in the Borough and at the Eastern Gateway (Sproughton Enterprise Park) in Sproughton could accommodate the proposed development.

Cllr David Busby: My overriding concern is with the increase in traffic that will result and its planned access. The internal roundabouts are extremely busy with existing users. In addition to businesses already trading, we have approved a drive-thru MacDonalDs plus there are the ToyRUs, Mothercare and Majestic Furnishings buildings that will come back into use one day.

There will be an additional 1500 houses who are likely to access the site. I don't believe the access roads will cope with all of this additional traffic. Using the same smaller roundabout are the Park & Ride, the CoVid testing centre plus the small retail site. There is also a footpath from Copdock village which brings pedestrians and cyclists in contact with vehicles. In addition to all of the new businesses that this application will bring, it is proposed to build a link to Thompson & Morgan

In the original plans the employment site was going to be accessed via a new junction on the A1214 - what happened to this? I welcome new employment opportunities for this area but not warehousing.



Cllr Ric Hardacre: I wish to register an objection to this proposal. The plans would generate an unacceptable level of traffic resulting in congestion, noise and pollution on top of the existing oversaturated set of roundabouts within Copdock Interchange, with the A1214 and further afield including Scrivener Drive. These roads are already at capacity even without including the newly approved McDonalds yet to be built, the former Toys-R-Us and Mothercare buildings which may come into occupancy at little notice.

Furthermore this development would represent the final destruction of what remaining green land there is within the enclosure of the A14, when taking the Wolsey Grange developments into account and the allocated employment land adjacent to the Holiday Inn. This land should instead be rewilded, with majority given over to new tree planting to reduce particulate and noise pollution as well as contributing to fighting climate change. This new green woodland would provide recreation space for residents of the new builds and could be tailored as wildlife corridors and links between the old-A12 underpass, the Hadleigh Road bridge, Chantry Vale and onwards to Chantry Park

## **B: Representations**

At the time of writing this report, at least one online comment has been received. It is the officer opinion that this represents one objection. A verbal update shall be provided as necessary.

Views are summarised below:-

- Proposed development should take HGV traffic from Thompson and Morgan as Poplar Lane is not suitable for HGV traffic.
- The proposed heights of the buildings would be detrimental to the amenity of neighbouring properties
- Proposed trees will not be tall enough to screen the buildings.

(Note: All individual representations are counted and considered. Repeated and/or additional communication from a single individual will be counted as one representation.)

## **PLANNING HISTORY**

No relevant history on the site. The adjacent site has planning permission for employment and residential purposes as part of the larger Worsley Grange site.

---

# **PART THREE – ASSESSMENT OF APPLICATION**

---

## **1.0 The Site and Surroundings**

- 1.1. The site comprises an agricultural field measuring 7.98ha. Two electricity lines with pylons cross the site. The site slopes steeply from north to south. To the north of the site is an area of informal parking associated with Thompson and Morgan and, beyond this, the buildings and land comprising the Thompson and Morgan employment site. To the east of the site is agricultural land which has outline planning permission for employment purposes as part of the wider Wolsey Grange development. To the south of the site is the London Road Park and Ride Site, London Road and a cluster of seven dwellings. To the west of the site is the A14. Beyond the site are the large warehouse type buildings comprising the Interchange Retail Park and Tesco Extra.
- 1.2 The site is relatively open with some mature trees to the south between the site and the park and ride site.

## **2.0 The Proposal**

- 2.1. The proposal is a Hybrid Application consisting of an Outline Planning Application for Interchange 55 comprising predominantly industrial (B2 use) and warehousing (B8 use) and prospective offices, research and light industry (E(g) (i, ii, iii) uses) buildings; and a Full Planning Application for access to the development and associated landscaping.
- 2.2. The proposed access would be via the park and ride site to the south, the existing exit road out of the park and ride would be widened and lengthened to break through into the site. This would involve the loss of some of the vegetation within the site.
- 2.3. Access to the London Road Park & Ride and onwards to the site is via the A1214/Scrivener Drive roundabout, through the access road to Tesco and The Interchange Retail Park and over two small roundabouts. There is also a potential access from the Thompson and Morgan site for HGVs and emergency access.
- 2.4. The indicative layout for the employment land shows six large blocks of buildings, one located to the east, three in the centre of the site and two to the west. Parking and servicing would be provided for each unit. There would be two infiltration basins located either side of the access road to the south east of the site.
- 2.5. Landscaping would be retained and supplemented especially along the A14 and London Road boundaries. A 15-metre landscape belt would be provided between the new employment buildings and seven dwellings located on London Road.

## **3.0 The Principle Of Development**

- 3.1. Policy CS7 of the Babergh Core Strategy (2014) allocated the site and surrounding land for 26 hectares of mixed use development including approximately 6 hectares of employment land to create a quality gateway business/employment area. The adjacent site has been developed as Worsley Grange for 29.7 hectares of mixed use development including 4 hectares of employment land. The masterplan for Worsley Grange showed the site as employment land to come forward in the future.
- 3.2. The site measures 7.98 hectares. Added to the 4 hectares of employment land at Worsley Grange, this would be above the 6 hectares of employment land required under policy CS7; however, the wording of Policy CS7 states that approximately 6 hectares was required, which allowed for some flexibility over the amount of employment land provided.
- 3.3. The Joint Local Plan currently has little weight; however, the site is located within the settlement boundary of Sproughton – Wolsey Grange within the JLP, although it is not allocated for any specific use.
- 3.4. Policy EM1 of the Babergh Local Plan (2006) states that employment-related development proposals which are not covered by other policies will be judged, in particular, against the expected job creation, the potential effect on residential amenity, environmental quality, traffic generation and road safety, and site accessibility by a range of transport modes. The proposed development, once built out, is expected to provide in excess of 500 jobs in a sustainable location on the edge of Ipswich. The remaining aspects of Policy EM1 will be considered in the report below.

- 3.5 Policy EM20 of the Babergh Local Plan (2006) state that proposals for the expansion/extension of an existing employment use, site or premises will be permitted, provided there is no material conflict with residential and environmental amenity or highway safety. While the site is not strictly an expansion of an existing employment use, site or premises, the site is surrounded by other commercial development, (retail uses to the south, Thompson and Morgan to the North and the new Worsley Grange employment site to the west) and makes a logical expansion of these uses. In addition, the indicative layout includes additional parking and an access from the Thompson and Morgan site, there is also a possibility that Thompson and Morgan will take on buildings within the site. Therefore, some aspects of the scheme involve the potential expansion of an existing employment use.
- 3.6 Taking Policy CS7, EM1 and EM20 in the round it can be considered that the principle of employment use on the site is acceptable. While the comments of Ipswich Borough Council are noted as the site is allocated for employment uses, it should have been included within any calculations of employment capacity for the wider Ipswich area.

#### **4.0 Nearby Services and Connections Assessment Of Proposal**

- 4.1. The site is located on the edge of Ipswich and is well connected via the A12 and A14 to the wider country. The site is easily accessible from the residential communities within the south east of Ipswich, providing employment opportunities for these residents. The site is adjacent to the park and ride site which provides a frequent bus service from Ipswich Town Centre from 7am to 7pm. There is also a bus service to the nearby Tesco. The adjacent retail, cafes and restaurants would all be able to provide facilities within walking distance for the employees within the site.

#### **5.0 Site Access, Parking And Highway Safety Considerations**

- 5.1. The site would be accessed via the Ipswich Park and Ride site, vehicles would generally access the site via the A1214, the Scrivener Drive roundabout, the internal Tesco roundabout and then a new junction to the site and the Park and Ride. The existing Copdock Interchange site is frequently used by delivery lorries for the retail uses and HGVs accessing the petrol station and the internal roads have designed for HGVs.
- 5.2 The proposal involves significant alterations to the existing access to the park and ride. The mini roundabout would be removed and a priority junction would be created with a junction off to the existing retail units. The scheme would involve the loss of 23 car parking spaces at the Park and Ride and the relocation of another six spaces. The Park and Ride site appears to be over-capacity in relation to parking spaces and there is no concern with the proposed loss of spaces.
- 5.3 Internal road layout within the site would need to be agreed with a full planning application. However the indicative layout includes a link road from the Thompson and Morgan site. This would be one way only and would allow HGV vehicles from Thompson and Morgan to bypass Poplar Lane, which is increasingly frequented by residential traffic as the Wolsey Grange estate is developed
- 5.4 Parking would be provided within the site based on the standards set out within the Suffolk Parking Guidance. The exact amount of parking spaces provided would depend on the size and use class of the individual units which would be determined at Reserved Matters stage. It is considered that the site is large enough to comfortably provide all the required parking spaces.
- 5.4 The introduction of 7.98 hectares of employment land will have a significant impact on the local highway network, including the Scrivener Drive/ A1214 roundabout and the A1214 Copdock

roundabout. The capacity of the Scrivener Drive roundabout is currently proposed to be increased as part of the Wolsey Grange development (once 300 dwellings have been built), and no further junction improvements can be made. It is proposed to include a condition within this application to undertake these junction improvements, should they not have already been undertaken when 25% of the site is occupied.

- 5.5 The junction modelling provided shows that, even with the proposed improvements to the Scrivener Drive roundabout, there will be a negative impact on local junctions, resulting in further queuing of traffic. However, the level of impact is below the 5% threshold on all but one of the junctions, which is the level where the LHA would start to consider there to be a severe impact. Therefore, the overall impact of the proposed development on the highway is not considered severe. It should also be noted that the junction modelling includes the potential effect of traffic from Wolsey Grange 2.
- 5.6 Initially the LHA suggested a s.106 agreement to provide £124,875 funding towards sustainable travel improvements on the A1214 London Road corridor to further encourage the use of sustainable modes of travel and mitigate the impact of the development on the local highway network. It should be noted that this is also the proposed mitigation for the effects of the Wolsey Grange 2 application which is currently being considered. However the LHA have now agreed that such funding would not be justifiable. It is considered that the improvements to the wider highway network (including improvements to the London Road pedestrian/cycle path and Park & Ride junction) would benefit users of the proposal and others.
- 5.7 It is considered that the improvements to the pedestrian/cycle connections would encourage some modal shift and may also improve the viability of the existing park and ride bus service, as employees on the site may use the park and ride bus service (or the alternative bus service to Tesco) to access the site. The location of the site does make it accessible by walking/bike from Pinewood, Copdock and Washbrook and parts of South East Ipswich. In addition there is a frequent bus service to the site.
- 5.8 National Highways have also stated that the development will contribute to queues along the Western approach slip road to the Copdock Interchange (A14/A12 interchange). They have therefore requested a condition requiring a scheme for warning signs to state Queues Likely On Road Ahead on the A14 Western approach to Copdock Interchange.

## **6.0 Design And Layout [Impact On Street Scene]**

- 6.1. Design and layout are reserved matters. Various layouts within the site have been suggested but ultimately this will be based on the unit sizes required by the market. The overhead power lines and the neighbouring properties provide some constraints which will restrict the layout of the development.
- 6.2 Given the strategic location of the site, adjacent to the A14, it is likely that large warehouse units would predominate in the site. These would be a similar use to the adjacent employment site and in keeping with the large retail units which lie to the south.

## **7.0 Landscape Impact, Trees, Ecology, Biodiversity And Protected Species**

- 7.1. The site is relatively well contained from long distance views, by existing development and landscaping. Although the site may be visible from the A14, the development would be seen in context with other built development on the edge of Ipswich. In addition, the A14 is in a cutting at

this point and it is proposed to provide additional landscaping along the boundary with the A14 which will restrict views from it. The development would also be viewed from London Road but mature trees on this boundary are to be retained, which would help to decrease the impact of the development. In addition, the height of the buildings would be limited to 12.5 metres to decrease the impact of the development.

- 7.2 It may be possible to view the site from long distance views to the south of the A14; however, any views would be seen in context with the A14 in the foreground and prominent development at Copdock Interchange.
- 7.3 The tree officer has not objected to the proposal; most of the mature trees on the edge of the site would be retained and the trees removed are of limited value. Significant additional trees would be provided as part of the landscape belt.
- 7.4 An Ecological Assessment has been provided as part of the proposal; this shows that, subject to conditions including appropriate mitigation, the development would not have a detrimental effect on priority species. In addition, the soft landscape proposals are accompanied by Defra Biodiversity Metric 3.0 calculations undertaken by the applicant's ecologist, which demonstrate 12.79% gain for habitats and a 26.92% gain for hedgerows. Therefore, this assessment clearly demonstrates that measurable net gains for biodiversity will be achieved for this scheme.

## **8.0 Land Contamination, Flood Risk, Drainage and Waste**

- 8.1 The land is currently in agricultural use and there are no land contamination concerns.
- 8.2 The site is within Flood Zone 1 and is at low risk of pluvial flooding, a very small part of the site at the south east end is at risk of surface water flooding.
- 8.3 The planning application is accompanied by detailed drainage proposals and proposes two SUDs basins either side of the access road at the south east corner of the site, where the land is at its lowest and would include the majority of the area which is at risk of surface water flooding. The Flood and Water Officer has considered the proposed SUDs strategy and recommends approval subject to conditions.

## **9.0 Heritage Issues**

- 9.1. The nearest listed building is Poplar Farm, which is located on Poplar Lane, approximately 220 metres from the site. The setting of Poplar Farm has significantly altered with the development of the Wolsey Grange site and the additional development on this site is not considered to have an additional impact on the setting of the listed building.
- 9.2 Archaeology: The site includes an area of high archaeological importance where records suggest the former church of Felchurch was located. During the application process, archaeological trenching was undertaken. 7 separate human remains were found in what was concluded to be the churchyard of the church, but no remains of the church were found.
- 9.3 The Archaeological Officer has stated that the area of high archaeological importance is of local/regional significance and importance, and paragraph 203 of the NPPF is relevant. This states that: "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset".

- 9.4 Policy LP21 of the emerging Local Plan (November 2021) is also relevant and highlights that harm to heritage assets should be avoided in the first instance. The Archaeological Officer has stated that the ideal solution would be for the area to be protected as green open space with interpretation boards. The developer has stated that the area is required for development and cannot be given over to open space
- 9.5 An alternative would be removing the remains, but as there is likely to be a significant amount of bodies on the site, this could be a long and expensive process. The developer has provided an alternative indicative plan, showing carparking on the area of high importance. The construction of the car park could be undertaken in such a way as not to disturb the archaeology. While the area would be less easily interpreted, it would protect the archaeological remains.
- 9.6 As the application is at Outline stage it is not possible to determine the solution for the area of high archaeological importance as this stage, the Archaeological Officer is therefore proposing a series of conditions which would be implemented depending on what the developer proposes for the area at Reserved Matters stage i.e. preserve *in situ* or remove.

## **10.0 Impact on Residential Amenity**

- 10.1. The nearest properties to the site are the seven properties located to the south east of the site on London Road which adjoin the site. These properties are located to the rear of the Interchange Retail Park so are already somewhat impacted by large buildings and commercial noise and disturbance. It should be noted that five of the seven dwellings were granted planning permission in 2016 following the publication of the Core Strategy, when the site had been allocated for development.
- 10.2 To the north east of the site, there is Outline Planning Permission for residential development as part of the wider Wolsey Grange site. These dwellings would be located approximately 100 metres from the edge of the site.
- 10.3 The indicative layout shows a 15-metre landscape buffer between the dwellings on London Road and the proposed buildings, which are shown at a height of 10 metres at this location. Much of this landscaping is already in place on the western side of the dwellings, although there is currently an open aspect to the rear. Once matured, it is considered that this level of landscaping would be sufficient to protect the amenity of the occupiers of the dwellings in terms of outlook and to a lesser extent noise. As the site is to the north of the properties, the additional landscaping should not have a detrimental impact on the levels of light to the properties.
- 10.4 With regards to the residential properties on Wolsey Grange, it is considered that there is sufficient distance between the site and these properties to protect them from noise and disturbances from the commercial development.
- 10.5 A noise condition would be required to ensure that the noise from the development did not have a detrimental impact on neighbouring residential occupiers. This would need to be carefully worded to ensure that the cumulative impact of noise from the entire development is considered, while allowing plots to be approved individually.

## **11.0 Parish Council Comments**

- 11.1 The majority of matters raised by Sproughton Parish Council have been considered in the above report, but the following issues have also been raised:

- Detailed design of warehouses - this would be considered at reserved matters stage;
- Wildlife corridors especially for deer - whilst it is likely that Muntjac deer are present within the area, these are an invasive species and given the proximity of the A14 should not be encouraged into the area;
- Energy efficiency of buildings – it is proposed to include a “concurrent with the reserved matters” condition relating to the sustainability credentials of the proposal.

---

## **PART FOUR – CONCLUSION**

---

### **12.0 Planning Balance and Conclusion**

- 12.1. The site has been allocated for employment purposes within the Babergh Core Strategy (2006) and the development is generally in accordance with Policy CS7. Whilst the overall amount of employment space provided by the site is significantly above that envisaged by Policy CS7, it is considered that the site is capable of this level of development without being detrimental to neighbouring amenity or the wider landscape.
- 12.2 A small area of the site is of high archaeological importance and is considered to be a non-designated heritage asset. The NPPF states that:
- “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.
- 12.3 The site of Felchurch churchyard is considered to be of local/regional rather than national importance. The development would significantly change the appearance of the site and it would be harder to appreciate the location of the church on the highest part of the site. However, there are no visible ruins, and the remains underground would either be protected *in situ* or excavated and recorded. Therefore, the scale of the harm is considered to be less than significant. As a non-designated asset, the harm does not need to be outweighed by public benefits, but it should be noted that there would be significant public benefits from the overall development in terms of job creation.
- 12.4 There would be a significant traffic impact from the development on local roads, especially the Scrivener Drive/ A1214 roundabout and the A1214 Copdock roundabout and the capacity of these roads/junctions cannot be increased, beyond that which is already proposed under the Wolsey Grange development. However, neither the SCC Highway Authority nor National Highways have stated that the highway impact would be severe and therefore in accordance with the NPPF, the development would have an acceptable level of impact on the highway.

## **RECOMMENDATION**

That the application be GRANTED planning permission and include the following conditions:-

- Standard time limit (3yrs for implementation of Reserved Matters)
- Approved Plans (Plans submitted that form this application)
- Fire hydrants
- Archaeological conditions
- SuDs conditions
- Highway conditions including A14 signage and off-site highway improvements to the A1214/ Scrivener Drive/ Tesco roundabout
- Energy and renewal integration scheme to be agreed
- Construction Plan to be agreed.
- Details of lighting
- Noise restriction condition
- Ecological mitigation and improvement
- No building above 12.5 metres in height
- Development undertaken in accordance with the arboricultural report

**(3) And the following informative notes as summarised and those as may be deemed necessary:**

- Proactive working statement
- SCC Highways notes
- Support for sustainable development principles