

Committee Report

Item No: 6A

Reference: DC/21/02671

Case Officer: Gemma Walker

Ward: Sproughton & Pinewood.

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

RECOMMENDATION – GRANT PLANNING PERMISSION WITH CONDITIONS

Description of Development

Outline planning permission (some matters reserved, access to be considered) Town and Country Planning Act 1990 - Erection of up to 750No dwellings, and up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements (accompanied by EIA Statement).

Location

Land North of The A1071, Ipswich,

Expiry Date: 23/08/2021

Application Type: OUT - Outline Planning Application

Development Type: Major Large Scale - Dwellings

Applicant: Taylor Wimpey UK Ltd.

Agent: Mrs Bethan Haigh

Parish: Sproughton

Site Area: 53.01ha

Density of Development:

Gross Density (Total Site): 14 dph

Net Density (Developed Site, excluding open space and SuDs): 40dph

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

Has a Committee Call In request been received from a Council Member No

Has the application been subject to Pre-Application Advice: Yes

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

It is a “Major” application for 15 or more dwellings

CLASSIFICATION: Official

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

CS1 - Applying the presumption in Favour of Sustainable Development in Babergh
CS2 - Settlement Pattern Policy
CS3 - Strategy for Growth and Development
CS7 - Strategic Site Allocation - Babergh Ipswich Fringe
CS12 - Design and Construction Standards
CS13 - Renewable / Low Carbon Energy
CS14 - Green Infrastructure
CS15 - Implementing Sustainable Development
CS18 - Mix and Types of Dwellings
CS19 - Affordable Homes
CS21 - Infrastructure Provision
EN22 - Light Pollution - Outdoor Lighting
HS31 - Public Open Space (1.5 ha and above)
CR04 - Special Landscape Areas
CR07 - Landscaping Schemes
CR08 - Hedgerows
CN01 - Design Standards
CN04 - Design & Crime Prevention
CN06 – Setting of Listed Buildings
TP15 - Parking Standards - New Development
TP16 - Green Travel Plans

Neighbourhood Plan Status

This application site is within a Neighbourhood Plan Area.

The Neighbourhood Plan is currently at:-

Stage 1: Designated neighbourhood area
Stage 2: Preparing a draft neighbourhood plan
Stage 3: Pre-submission publicity and consultation
Stage 4: Submission of a neighbourhood plan
Stage 5: Independent Examination
Stage 6: Referendum
Stage 7: Adoption by LPA

Accordingly, the Neighbourhood Plan has limited weight and could also be subject to further revision.

Relevant policies include:

SPTN1 Spatial Strategy
SPTN 2 Housing Mix
SPTN 7 Area of Local Landscape Sensitivity
SPTN 8 Settlement Gaps

SPTN 9 Protection of Important Views
SPTN 10 Local Green Spaces
SPTN 11 Biodiversity Protection and Enhancement
SPTN 12 Recreational Disturbance, Avoidance and Mitigation
SPTN 13 Heritage Assets
SPTN 16 Development Design Considerations
SPTN 17 Flooding and Sustainable Drainage
SPTN 19 Open Space, Sport and Recreation Facilities
SPTN 21 Public Rights of Way

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

Town/Parish Council

Sproughton Parish Council Objection update 1/12/2022

Objection on the following grounds:

Emerging BMSDC Joint Local Plan allocation, no certainty that this site will need to be included, and should not be considered at this time.

Housing need provision in Ipswich Fringe now well beyond 2038, no justification for more housing provision 80% of the proposed JLP provision for the whole district to 2036 already approved, there are no exceptional circumstances that might justify this speculative application at this time and we object it for these reasons alone before even considering any adverse Impacts.

Land Area/Type- the developed area inside the A14 abutting Ipswich is considered urban for planning purposes, but the application site isn't developed, it is greenfield farmland and valuable wildlife green infrastructure.

Need for a full master plan

Landscape harm should be considered as it existed prior to any development.

Special landscape area

Any negative impacts of WG1 should be considered in conjunction with and cumulative to WG2 and any other adverse impact on the vale like the La Doria building.

CS7 should now be applied across the whole effected SLA area

Exaggerated visual impact of the height of buildings and structures due to valley-side landscapes

Significant visual impact and adverse effect on the character of the landscape due to valley-side landscape settlement extension

Impact on heritage assets

Inadequate provision of community and healthcare facilities

Inadequate consideration of cumulative impact of local infrastructure

Drainage strategy

Important wildlife areas

Premature application

Sproughton Parish Council 16/08/2021

Objection on the following grounds:

Lack of master plan

Cumulative impact

Lack of infrastructure

Unacceptably high adverse impact on the Landscape Value of Chantry Vale

Should preserve the remaining landscaping close to the urban edge of Ipswich

Adverse heritage impacts as this is a historic landscape that defines the historic settings on the heritage assets.

Insufficient buffer between the proposed development and the historic edge of Grade II listed Chantry Park Development on the valley side/ridge between Grade II listed Red House Farm and the A14 will destroy the landscape backdrop of Red House Farm

The 'Rolling Valley Farmland' character of the valley slope South West of Red House Farm will also be completely altered with artificial stepped Attenuation Basins again altering the historic landscape setting in front of Red House Farm.

Impact on Special Landscape Area

Style and design of the development not appropriate

Harm to pleasant and green route into Ipswich

Inadequate provision of community facilities

Application premature

Unacceptable and significant threat of Creeping Coalescence to Sproughton

Inadequate consideration for cumulative impact on local infrastructure in the area.

Inadequate public transport

Drainage strategy presenting unacceptable risk to listed Grade II Heritage Asset.

No consideration of Sproughton Neighbourhood Plan Design Codes.

Lack of clarity of proposed building sizes and planting.

Threat to three important local Wildlife Areas: Chantry Vale sits beside the County Wildlife site in Chantry Park, The Chantry Cut Island nature site and river valley (SEP Site) and this also acts as a wildlife route into and supporting a third site the County Wildlife Site on the River Gipping from the railway line bridge at Boss Hall to Yarmouth Road.

Not acceptable without planning conditions to ensure 35% affordable housing.

Inadequately defined Primary School Provision

Pinewood Parish Council – 16/08/2021

Objection on the following grounds:

Cumulative effect of development with surrounding parishes, Wolsey Grange 1 and commercial distribution park at Sproughton irreversibly change this part of Suffolk.

Increase in traffic on local road network

Harm to heritage assets

Lack of health infrastructure

Need for primary school immediately

Ecological impact

Water quality

Need for 35% affordable housing

Solar panels on all appropriate roofs and electric vehicle charging points for each dwelling

National Consultee

Highways England 16/11/2022

No objection. We are now content there will not be a severe impact upon the Strategic Road Network.

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Environment Agency 22/06/2021

Water Quality

We can see that Anglian Water (AWS) have been consulted on the development and have confirmed there is capacity at Chantry WRC to accept the flows from this large development site. We also agree with this and have no concerns over capacity at Chantry to be able to accommodate the additional foul water flows.

However, although a comprehensive ES has been undertaken with a separate Utilities & Water Management chapter, there is no consideration for the potential environmental impacts, especially water quality impacts, of the increased discharge from Chantry WRC on the local water environment. This is disappointing to see when the rest of the report is so comprehensive.

Water Resources

According to Anglian Water's Water Resource Management Plan (<https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>), demand for potable water will be greater than supply by 2045. Water Resources in the east of England are under increasing pressure from a rapidly growing population, climate change and environmental needs, therefore it is essential that new developments ensure water efficiency strategies are included within plans. In the sections of the Environmental Statement that cover water resources, climate change and utilities there is no mention of water saving techniques that are planned for this new development.

Flood Risk

We have no objections in relation to flood risk, providing that you are satisfied that the development would be safe for its lifetime and you assess the acceptability of the issues within your remit. The applicant has sequentially sited all proposed development within Flood Zone 1.

Historic England 1/11/21

No comment. Suggest seek views of specialist conservation and archaeological advisers as relevant.

Natural England 10/1/2023

No objection subject to appropriate mitigation being secured

We consider that without appropriate mitigation the application would have an adverse effect on the integrity of:

- Deben Estuary Special Protection Area (SPA)
- Deben Estuary Ramsar
- Stour and Orwell Estuaries SPA
- Stour and Orwell Estuaries Ramsar

Damage or destroy the interest features for which:

- Deben Estuary Site of Special Scientific Interest (SSSI)
- Orwell Estuary SSSI has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- A proportionate financial contribution to the Suffolk Coast Recreational Avoidance and Mitigation Strategy (Suffolk Coast RAMS)

- Onsite green infrastructure as outlined in the Habitats Regulation Assessment (HRA).
- The upgrading of Chantry Wastewater Recycling Centre (WRC) as identified in the Habitats Regulation Assessment (HRA).

We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Further advice on mitigation

- A proportionate financial contribution to the Suffolk Coast Recreational Avoidance and Mitigation Strategy (Suffolk Coast RAMS) of £121.89 per dwelling should be secured by condition or obligation.
- On-site green infrastructure as outlined in the Habitats Regulations Assessment (HRA); including:
 - Development incorporates over 50% of the site as designated public open space
 - 21.52 ha of natural and amenity greenspace will be managed, using a Landscape and Ecological Management Plan (LEMP) (CSA Environmental, Rev L 22 Nov 2021).
 - Three dog walking routes of at least 2.7km, two of which utilise existing routes within the confines of the Site and the other proposes to utilise existing walking routes through Chantry Park via the existing PRow network and two dogs off lead areas (Dog Walking Routes & Off Lead Areas Rev C02 (Sweco, 3.9.21)
- The Habitats Regulation Assessment identifies that no adverse effects on integrity (AEOI) would occur if Chantry WRC receives upgrades, as modelling shows that it would then be able to accommodate the extra waste water of nearly 750 homes. To ensure that the conclusions of the HRA can be concurred with the competent authority, it must ensure that the identified measures (Chantry WRC upgrade) are suitably secured via a planning condition or legal obligation.

Site of Special Scientific Interest

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Officer Note: The recommendation includes S106 obligations and conditions as set out above, such that the proposal follows the advice of this letter. Conditions to require phasing in accordance with the timescale for delivery of the Chantry WRC are proposed as per the recommendations of Anglian Water.

NHS 15/06/2021

There is GP practice within a 2km radius of the proposed development, this practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore, a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of a new build at Hawthorn Drive Surgery, servicing the residents of this development, would be sought from the CIL

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contributions collected by the District Council. The CCG is continually working with the Infrastructure Team at Babergh and Mid Suffolk District Council and the CIL is being discussed at present.

Anglian Water 04/06/2021

The foul drainage from this development is in the catchment of Chantry Water Recycling Centre that will have available capacity for these flows

Anglian Water notes the close proximity of this development to SPROUGHTON-CHURCH L STW water recycling centre (WRC) and would draw attention to the potential for nuisance, associated with the operation of this treatment works, to effect the proposed development. Our initial odour risk assessment indicates that there is potential for loss of amenity at sensitive property within the proposed development due to odour emissions from the operation of the WRC. This WRC is operated in compliance with the appropriate regulatory standards and in accordance with established best practice, however, the process is inherently prone to short periods of relatively strong odorous emissions, against which there is little practical mitigation. We would advise therefore, that the proposed layout seeks to maintain an effective distance between the treatment works and sensitive accommodation. We would further recommend that a detailed odour risk assessment is undertaken to establish the range at which the amenity of neighbouring property is likely to be impaired. The results of any detailed assessment can be reviewed in further consultation.

Used Water Network

Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. A drainage strategy to serve the site will need to be identified with Anglian Water. We therefore request a condition requiring phasing plan and on-site drainage strategy.

Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

Anglian Water would therefore recommend the following planning conditions if the Local Planning Authority is mindful to grant planning approval; phasing, and used water sewerage network.

Officer Note:

An odour assessment has been submitted with the application, and further work in respect of odour has been undertaken with Environmental Health, as per their consultation response below, which confirms that the design has taken this into account and providing the design does not change it has been agreed that there is no significant impact and as such no mitigation for odours is necessary. This can be further secured at reserved matters design stage.

EAST Suffolk IDB 07/06/2021

The site is partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB), specifically the northern part of the site is within catchment CMT186G – River Gipping Central (S), and therefore the Board's Byelaws apply.

Suffolk Preservation Society 22/06/2021

I write on behalf of the Suffolk Preservation Society (SPS) regarding the above outline application for the development of a site which is currently being brought forward in the emerging joint local plan (site LA013). Throughout the consultation process, SPS has consistently objected to the inclusion of this site due to the significant harm that will result from its development on a number of designated heritage assets. We are therefore disappointed that this application has been submitted in advance of the Examination of the Local Plan and wish to register our objection to the application.

Nevertheless, should the Examination allow the inclusion of this site within the Local Plan, SPS would like to raise the following issues regarding the impact of the development on the setting of heritage assets. Our primary concern is that the applicant has understated the heritage impact of the proposals on Red House Farm (grade II listed) and Chantry Park a grade II Registered Park and Garden and the gatehouse, listed grade II.

Impact on Heritage Assets

Red House Farm is an isolated red brick farmhouse and barn dating from the sixteenth century. It is prominent in views when travelling along Hadleigh Road and currently sits within an agricultural setting with an urban backdrop of the edge of Ipswich in the distance. The undulating topography of the land results in the farm sitting in a valley with land rising to the south, north and east. Its isolation from the town serves as a reminder of the very rural history of the area whilst its agricultural setting contributes to the significance of the heritage asset as a former farmhouse. The experience of the farmhouse from Church Lane is also significant as its unchanged agricultural setting to the south and east towards Chantry Park is evident; the recent Wolsey Grange development and the A1071 being entirely hidden over the brow of the hill.

Whilst the application indicates that development immediately around Red House Farm will be restricted due to a covenant on the land, SPS considers that the proposed development could seriously harm the setting of the heritage asset, enveloping the farmhouse in a suburban extension of Ipswich and removing its sense of rural isolation. The ground levels of the land to the east of the Hadleigh Road in particular rise sharply towards Chantry Park and dwellings on this part of the site will be considerably higher and will dominate Red House.

Whilst this is an outline application, we note that figures 39 and 40 within the Built Heritage Statement at Appendix 6 indicate that the built edge will be set back to allow for views of Red House Farm when approaching along Hadleigh Road. SPS considers that this is inadequate and that if the development of this site is to proceed, a far greater set back of the dwellings, together with a more substantial level of tree planting than that indicated should be pursued by the lpa in order to meaningfully reduce the impact of the suburban extension on Red House Farm.

SPS also has concerns regarding the impact of the development on Chantry Park Registered Park and Garden and grade II listed gatehouse. Since their construction, the development of Ipswich has resulted in the urban edge wrapping around the north and east sides the park. Meanwhile, the agricultural land to the west and south of this designed parkland has been retained. This provides the last remaining element of the intended context to these assets' original setting, contributing to their significance, which will be lost if the proposed development is permitted in its current form

When assessing the level of harm to a heritage asset through development within its setting, Historic England GPA, *The Setting of Heritage Assets* (2015) clearly explains *“that a negative cumulative change could include severing the last link between an asset and its original setting”*. SPS therefore urges that, should this development proceed, the lpa pursues a significantly greater buffer area between the edge of the parkland and the built edge of the development in order to retain a sense separation.

In summary, SPS considers that the proposals as currently presented, have the potential to cause medium to high levels of less than substantial heritage harm which have been under assessed by the applicant. Accordingly, we object to the application in its current form. We request that SPS is consulted on any amendments to the application.

British Horse Society 26/05/2021

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and February 2021, the BHS received reports of 5,784 road incidents, in which 441 horses and 44 people were killed. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).

The BHS has significant concerns about the impact that this proposed development of nearly 800 new homes will have on traffic circulation on local roads. The adverse effects of this on the safety of local horse riders have not been acknowledged within the application, and in the absence of any proposals for mitigation the Society must OBJECT to this proposal on the grounds of highway safety.

Although there is a good local network of public footpaths, these are not legally accessible to horse riders therefore riders have few options other than to use the local roads (as they are legally entitled to do) to exercise their horses. The addition of nearly 800 new homes within the area will exacerbate a situation that is already a concern, yet this has not been acknowledged or addressed within the plans for this development, which propose safe, off-road routes for pedestrians and cyclists but not for horses.

The Suffolk Green Access Strategy (the County Council's statutory Rights of Way Improvement Plan) recognises the limitations for Non-Motorised Users: '2.3 Connectivity – 2.3.1 Take a whole highways approach when considering the journeys of vulnerable users.' We therefore ask that if Babergh and Mid Suffolk Council is minded to approve this application, a Condition is made to dedicate a network of bridleways within and around the site to provide safe routes for ALL vulnerable road users – equestrians as well as pedestrians and cyclists. There are sound social and economic reasons for doing this. Riding is an activity which contributes to the physical and mental wellbeing of people of all ages and circumstances and is by no means an exclusive pastime for the wealthy and/or landed minority. 67% of those who ride are female, and riding is an important means by which people who are less mobile through age or disability can continue to enjoy access to the countryside.

I recognise that many of the proposed routes within this consultation are in urban areas. However, many horses are kept on the urban fringe, so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding environs. Equestrians have not been included within any part of this application. Exclusion of equestrians from any safe access provision for cyclists is not only discriminatory and contrary to the ethos of the Equality Act 2010, but it also actually puts equestrians in increased danger. It is to be avoided. Safe access must be available all vulnerable road users.

When the A14 and surrounding infrastructure was first built many Public Rights of Way were severed and disregarded, developments such as this provide the opportunity to rectify these severances. This application should be considered in line with the Copdock Interchange proposals and any non-motorised user routes which will connect to the site as part of this application. This will provide safe off road access for equestrians providing a connection with routes to the north and south of the A14 which has been lost for many years.

Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate. Where proposed new, or improved routes have crossing

points or junctions with the main highway network, appropriate signal-controlled (or even gradeseparated) crossings should be provided suitable for all user groups. The routes up to and using the Toucan crossing proposed should be inclusive of equestrians therefore requiring a Pegasus crossing.

Consideration should be given to the use of 'Quiet Lanes' where the speed of traffic is reduced. Where motorised traffic is to be prohibited on either a right of way or minor road to facilitate cycling and walking, it must be remembered that this is likely to also benefit equestrians. Signage and structures must not impede equestrians.

Woodland Trust 8/08/2022

While we acknowledge that the road will be outside of the root protection area as per BS:5837 specifications, veteran trees often require larger buffer zones to ensure their long term vitality and retention via the protection of their sensitive rooting environment. Natural England's Standing Advice recommends the following buffer zone size: *"For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone."*

Therefore, we'd like to see the RPA recalculated in line with the standing advice. A larger buffer zone will also reduce the risk of damage via pollution from passing cars, and road runoff from being intercepted by the tree's roots. Furthermore, HERAS fencing should also be erected prior to construction to demarcate the no-construction zone. Ideally, if this can be secured by condition, that would remove our objection to this proposal.

Officer Note: An amended plan for T127 has been submitted showing a buffer zone and this can be secured as part of the landscape and layout reserved matters.

Garden Trust 13/07/2022

The register entry description for the Grade II registered park and garden (RPG) of Chantry Park makes clear that there are views westwards from the elevated viewpoint of the RPG down over the Gipping Valley and the development site. The RPG was formerly surrounded entirely by agricultural land. Over the years this land has been eroded by housing on all sides except for the remaining western section, the final remnant area which allows the original context of its intended designed landscape setting to be appreciated. The loss of this would in our opinion, appreciably harm the significance of the RPG and its setting.

Figure 21 (p13) of The Built Heritage Statement (BHS) by CgMs dated April 2020 shows a *'direct view of the boundary with Chantry Park with the site (which) illustrates the density of the tree and undergrowth lines between them'* and the caption states that *'Chantry Parks (sic) landscape features ... are not appreciable from any part of the site.'* The BHS's final paragraph (p19) continues to downplay the impact of the proposed development on Chantry Park: *'As no appreciable experience of the Chantry Park or its associated built heritage assets is possible from within site and no legible functional or historic association can be established, it is considered that the site does not make a contribution to the significance of Chantry Park group of heritage assets.'* The GT/SGT disagree with these statements as nowhere within the documentation have we found any mention of what impact the large development may have upon the views from the higher land within the RPG, from which it will almost certainly be visible due to topography and gaps in the tree cover. Such impacts we feel invalidate the comment in the final paragraph on p28 of the BHS, which concludes that *'the proposed development is considered to represent a neutral impact on the significance of ... the parkland itself.'*

The Environmental Statement Part 2, Appendix 7.6, Viewpoint 6 shows a view from within the development site towards the RPG. However, nowhere in any of the viewpoint documents is there a corresponding view from within the RPG looking down towards the development area. We would ask that the applicant provide a couple of Wire Frame images taken from within the RPG looking down into allocation LA013, in particular the area which immediately adjoins the RPG, which we understand is zoned for approximately 160 units. The Design & Access statement, Part 4B, p69, point 5 relates to new tree planting '*along the eastern development edge with Chantry Park to add to the well treed edge and provide further filtering where views of the development are possible.*' This statement contradicts assertions mentioned above which indicate that there is no intervisibility.

Parcel 6 of the development area was formerly the site of an C18th mansion recorded in the Environmental Statement: a park, a mansion and an avenue leading up to it from the south, as recorded on Hodgkinson's 1783 Map of Suffolk, with the legend 'Sir Robt Harland'. The house was curiously never named, just referred to as 'Sproughton' –the parish name. In the 1790s the house was demolished and the Harland family moved to a new house at Wherstead Park before moving yet again to Orwell Park. For this reason, we suggest that an archaeological assessment should be carried out for remains of both the mansion and its surrounding park.

The GT/SGT strongly object to this premature application for outline planning in a site immediately adjacent to the Grade II Chantry Park RPG. This irreplaceable heritage asset will be irrevocably compromised if the final remnant area which allows the original context of its intended designed landscape setting to be appreciated, is destroyed by this large development.

Suffolk Wildlife Trust 16/06/2021

In order to reduce pressures on the neighbouring Chantry Park, Beech Water and Meadow County Wildlife Site, then it is important that the Northern Open Space is created prior to first occupation. As this area contains the proposed dog walking routes as mentioned within the Shadow Habitats Regulations Assessment, then it is important that this phase is installed prior to first occupation to ensure that recreational pressure on designated sites is not increased as a result of the development.

We note that it is possible a footbridge will be installed over the River Gipping. Both otter and water vole have been identified within the river. Otters are fully protected by legislation (Wildlife and Countryside Act (1981) (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended). Therefore, the footbridge must be located in an area which does not impact otters. Water Vole are fully protected by legislation (Wildlife and Countryside Act (1981) (as amended). Therefore, the footbridge should also be located in an area that does not impact upon water voles. As the location of the footbridge is to be determined, we are concerned about potential impacts upon these species and the River Gipping. The Shadow Habitats Regulations Assessment identifies that a Construction Environment Management Plan will be in place to address the potential risk from a pollution incident at the location of the footbridge, however the CEMP (RSK, April 2021) makes no mention of this. Therefore, once the location of the footbridge has been agreed, the CEMP is required to be updated to include the possible works to the footbridge and the mitigation measures required to avoid potential impacts.

There are records of great crested newt from Pond 2 onsite, as identified within the Pond Locations (MLM Group, October 2019). These records are dated 2018 and are provided by Suffolk Biodiversity Information Service (SBIS). We note that there was no presence of eDNA within this pond however, the historic records and the presence of eDNA within Pond 4, suggest a potential great crested newt population in the surrounding area. We recognise that no great crested newts were identified within the torching, netting and egg searches within Pond 4 and that the positive eDNA result was attributed to an inflow pipe. Therefore,

we recommend that the CEMP is updated to include a precautionary method statement for great crested newts.

The application proposes to plant hawthorn hedging around the existing pond onsite, at a minimum of 3m away from the pond's edge to create a natural barrier from domestic pets. It must be ensured that this hedging does not impact upon water quality of the pond and that future management ensures that the hawthorn planting does not impact the pondside and bank vegetation that supports water voles. This should be detailed within a Landscape and Ecological Management Plan, which should also detail how the habitats and open spaces on site are to be appropriately managed for biodiversity. This should be implemented as conditions of planning consent, should permission be granted.

We note the presence of an estimated minimum of 4 skylark territories which will be lost within the development. Skylarks are a Red Listed Bird of Conservation Concern in the UK and listed under Section 41 of the Natural Environment and Rural Communities (NERC) act. Therefore, offsite mitigation is required as highlighted within the report which should be detailed within a Skylark Mitigation Strategy, with the approach agreed prior to the works commencing.

As foraging and commuting bats have been identified as potentially using hedgerows and trees adjacent to the site, then it is important that there is no light spill from external lighting and that dark corridors are retained around the site for the foraging and commuting bats. Therefore, a lighting strategy in accordance with current guidelines should be designed. This should be implemented as a condition of planning consent, should permission be granted.

We welcome the proposals use of Biodiversity Net Gain Calculations to deliver measurable biodiversity net gain. However, as this is an outline application and the layout has not been produced, we query whether this is an accurate figure. In accordance with NPPF para 175d, proposals should demonstrate a 'measurable' net gain in biodiversity. Therefore, it should be ensured that the habitat units delivered in the calculations should match the proposed landscaping and habitats delivered within the subsequent reserved matters applications. The future landscaping, open spaces and planting within reserved matters applications should also demonstrate how they retain and enhance existing wildlife corridors and ecological networks onsite, to ensure that species and habitats do not become isolated by this development.

We recommend that integral swift nest bricks should be incorporated into buildings that are of minimum two storeys. The incorporation of swift nest bricks is an established way to enhance biodiversity within a development and provide net gain. Therefore, we request that this is done to provide enhancement to this Suffolk Priority Species, whose numbers have seen a dramatic decline in recent years.

There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development.

A Biodiversity Enhancement Strategy should be produced, detailing the how the enhancements made within the Environmental Statement are to be incorporated within the development, including their locations. This should be implemented as a condition of planning consent, should permission be granted.

Ipswich Borough Council 04/04/2022

Objection unless the following matters are addressed:

- Accessible to employment sites by sustainable modes of transport
- Encouraging and facilitating sustainable modes of transport
- Maximise links to Ipswich ecological network and public open space
- Mitigation measures to Chantry Park and IBC Open Space SPD

Management plan for public areas and refuse/recycling facilities
Policy compliant affordable housing
Phasing of development with regards to education provision being delivered early
Impact on heritage assets including Chantry Park
Transport mitigation should be provided and encourage pedestrian and cycling as preferred mode of transport
A bridge to connect the development to Footpath FP22 should be provided from the north of the site onto Foot Path 22 across the River Gipping.
Biodiversity improvement to be provided on site, and RAMS payment required
Health service provision contribution
Development should include some convenience retail floorspace

Officer Note: Following this Officers have liaised to overcome the issues and reach agreement, with contributions to Chantry Park for composting toilets and dog waste bins now requested.

County Council Responses

SCC Flood and Water 11/4/22

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/02671. The following submitted documents have been reviewed and we recommend approval subject to conditions;

FRA

Suds completion confirmation and inspection
Construction surface water management plan

SCC Highways 6/01/2023 (including Passenger Transport, Travel Plan and PROW)

Further to our previous responses, additional discussions, consideration and review have taken place, along with confirmation that National Highways are satisfied with the impact upon the Copdock interchange (A14 J55). Subsequently, we are now in a position to remove our previous objection subject to the following planning conditions and Section 106 contributions.

Summary of Conditions:

Offsite highway improvement full details for A1071/B1113/Swan Hill, A1071 junction, A1214 junction
Full details of Hadleigh Road roundabout access and footway, Hadleigh Road central access and footway, Hadleigh Road Northern access and footway.
Visibility splays for Hadleigh Road Northern and Central access
Cross valley cycleway/footway to be agreed
Hadleigh Road toucan crossing to be agreed
Cycleway/footway route and bus stop improvements close to A1071 to be agreed
Estate roads and footpaths implementation
Means to prevent discharge of surface water drainage onto the highway
Estate road phasing and completion plan to be agreed
Carriageways and footways constructed prior to occupation
Details of the areas to be provided for the loading, unloading, manoeuvring and parking of vehicles, including secure cycle parking to be agreed
Provision of electric vehicle charging points
Construction management plan
Details of landscaping that may impact upon the highway
Travel plan

Bus stop provision and improvements plan
Improvements to Footpath 14 agreed and implemented

Informative notes

Summary of S106 Obligations:

Sustainable travel improvements on the A1214 London Road corridor £375,000

Smarter choice contribution for modal shift £347,500

Speed limit extension on Hadleigh Road £11,500

Traffic calming on Hadleigh Road £40,000

PROW:

Upgrade Sroughton Public Footpath 14 from footpath to bridleway status	£5,000
Upgrade Sroughton Public Footpath 24 from footpath to bridleway status	£5,000
Improve Sroughton Public Footpath 24 to and through underpass to make route more accessible	£50,000
Improve Sroughton Public Footpaths 11 and 12 onto Church Lane	£20,000
Improve access along Sroughton Public Footpath 11	£30,000
Provide bridge over the River Gipping	£200,000

Allowing for staff costs and contingency the total PROW S106 requirement is £375,000

Travel plan £1,000 per annum from occupation 100 dwellings until 5 years after occupation of final dwelling

Bus service improvements £500,000

Total SCC Highways S106 contributions = £1,649,000 (not including annual travel plan contribution)

SCC Fire and Rescue 03/06/2021

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also 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, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

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. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

SCC Archaeology 27/05/2021

There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

SCC Infrastructure 09/12/2022

Updated summary of infrastructure requirements split between CIL/s106:

CIL	Education	
	- Secondary school expansion @ £25,253 per pupil place	£3,333,396
	- Sixth form expansion @ £25,253 per pupil place	£681,831
CIL	Libraries improvements @ £216 per dwelling	£162,000
CIL	Waste infrastructure @ £130 per dwelling	£97,500
S106	Education	
	- Primary school new build @ £21,774 per pupil place	£4,006,416
	- SEND new build provision @ £65,739 per place	£392,490
S106	Early years new build @ £37,499 per place	£2,362,437
S106	Freehold fully serviced site of minimum 3-hectares for the new primary school/early years setting	£1
S106	Highways	tbc
S106	Monitoring fee for each separate trigger point in a Deed	£476

Strategic Housing 25/07/2022

This is an outline development proposal of up to 750 dwellings and in order to be policy compliant, requires 35% affordable housing. This equates to 262.50 dwellings. We would request 262 dwellings on site and a commuted sum for the remaining 0.50. This advice is provided with regard to the current local planning policy framework, and not the emerging Joint Local Plan. Please note the emerging Joint Local Plan in respect of housing needs and design standards for space, accessibility, energy and water efficiency which may be in force by the time this development comes forward.

Heritage 13/09/2021

Designated heritage assets in close proximity to the site which have the potential to be harmed by the development are:

- Poplar Farmhouse, Grade II listed (list entry number: 1193985)
- Springvale, GII (1193916)
- Chantry Park Registered Park and Garden, GII (1000271), The Chantry (1037783), Gatehouse and entrance piers to Chantry House, GII (1236640)
- Red House, GII (1285933) and associated barn, also GII (1036924)

A built heritage statement is included as appendix 6.3 of the applicant's environmental statement, which includes a description of the asset's listed above and an assessment of how their significance will be affected by the proposals. Poplar Farmhouse has a historical association with the site, however as it is now in separate ownership and visually disconnected from the site, it is discounted from a full assessment by the applicant. I have no concerns regarding this conclusion.

Springvale is believed to date from the fifteenth century, with later alterations in the seventeenth to nineteenth centuries, which have resulted in the building having a complex planform. More recent alterations include notable changes to the building's use and setting; Springvale is currently in use as a childcare facility 'Oakland Hall', with a modern swimming centre built within its immediate grounds, designed to mimic agricultural barns. The architectural and historic interest of the building is primarily in its construction, however its setting provides context and understanding of the building's development and former function. The rural setting of Springvale can be appreciated from the north, east and south, however the development of the A14 to the west, A1071 to the south and associated development of Wolsey Grange 1, have had a marked impact upon the quality of this setting. Nevertheless, the proposed change of land use will, I feel result in a low level of harm to the setting of the listed building, removing it further from its formerly agrarian setting. Whilst the listed building is primarily appreciated in its immediate setting, its separation from domestic dwellings allow for the asset to be understood as a former farmstead, set within the agricultural landscape key to its function. This can be appreciated through views looking north east into the site, particularly in the winter months when there is limited tree cover. I disagree that there will be no impact at all to the setting of Springvale, as suggested by the submitted heritage statement. If built, the change in land use, impact upon views, increased associated traffic, density and proximity of the proposed development would result in a low level of less than substantial harm to Springvale's significance.

The Chantry, its associated registered parkland and listed gatehouse are assessed as a group within the submitted heritage statement. The house itself is concealed by an extensive boundary treatment along Hadleigh Road, comprised of primarily of tree cover and hedgerow, and is not visible from the site. No harm is anticipated to the significance of the listed Gatehouse and The Chantry, however the setting of the registered park and garden will be negatively altered by the proposals. At present, the agricultural landscape beyond the park's boundary provides important context to the parkland and associated house, acting as an important contrast and emphasising the park's separation from the urban development of Ipswich. Although modern development has occurred along the northern edge of Hadleigh Road, land to the west of the parkland has retained its agricultural use, which enables the park to be partially appreciated in its original and intended context, with its formal designed landscape giving way to agricultural land beyond. The topography of the parkland emphasises this change, and is mentioned within the list description for the registered park and garden: 'This topography allows views from the west park over the Gipping valley to the north and over countryside to the west' (Historic England: 1000271). Encircling the parkland with development on its western edge will thus remove its wider setting and the appreciation of the asset, resulting in less than substantial harm to its significance, in the middle of the scale.

Red House, Grade II listed and dating from the sixteenth century, has an early eighteenth century appearance, having been heavily remodelled in this period, then further extended in the subsequent century. Built in red brick and located on the northern edge of Hadleigh Road, the building is a prominent structure within the landscape. Important wide views of the listed building and associated farmstead (including the individually listed barn) can be gained when travelling west on Hadleigh Road, as the ground

falls into a small valley, which Red House is located in. These wide views look across the site affected by these proposals, the agricultural character of which provides important context to the Red House farmstead, emphasising its isolation and rural function. If the proposals are permitted, this open context and agricultural setting to the building would be lost, with the listed building and farm complex subsumed into an urban setting. There would therefore be harm to the significance of both listed buildings, the farmhouse and barn, within the realms of less than substantial, at the medium to high end of the scale. The applicant's conclusion that the site makes a 'moderate' contribution to the setting of the asset is, in my opinion, underestimated. Although modern development is partially visible, as indicated by figure 27 of the heritage statement, the Red House is viewed almost entirely in an unchanged, historical and agricultural context, removed from urban sprawl and modern commercial structures.

In conclusion, I am unable to support the proposals, which will result in harm to the heritage assets as described above. Sections 127(c), 196, 200 of the NPPF are relevant in this instance, as is 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Landscape

20/09/2021

We welcome the additional landscaping and tree planting proposed along the parcels north and south of Hadleigh Road to mitigate views towards Red House Farm.

We have no additional comments to the ones included in our previous response (date 30/07/2021)

30/07/2021

We are satisfied with the scope and geographic extent of both the landscape and the visual baseline studies which form the basis for the assessment of effects and have been supported by appropriate Zone of Theoretical Visibility (ZTV) mapping.

The site falls within three Landscape Character Types (LCT) as identified in the Suffolk Landscape Character Assessment (2011). These are the Plateau Farmlands, Rolling Valley Farmlands and Valley Meadowlands LCT. These designations are all based on the historical agricultural land use of the area. The recently constructed residential development to the south and commercial to the north have significantly altered the setting. In doing so the quality and value of the landscape have been reduced.

The Joint Babergh and Mid Suffolk District Council Landscape Guidance (2015) also refers to these LCTs, stating that the combination of the Valley Meadowlands and the Rolling Valley Farmlands are characteristic of the river valleys of south Suffolk and are considered to contribute significantly to the District's distinctiveness. Though given the incongruent elements already present in the local area, we concur with the applicant that the landscape character of the site and the LCTs is of medium/medium high sensitivity.

Generally, we agree with the assessed level of effect on landscape receptors. However, unlike the assessment, we would judge that the level of effect on the Rolling Valley Farmlands is moderate adverse. Given the undulating landform, the visual impact of new vertical elements is increased by this landform. Therefore, new buildings are likely to have a significant impact on both the character and visual amenity on the valley side, even with proposed mitigation measures proposed.

In terms of visual amenity, we agree with the chosen visual receptors and have no concerns regarding the number of viewpoints or verified views. All supporting photography accords with the TGN with verified views undertaken during the winter months to ensure a 'worst case scenario' is being judged.

The assessment concludes in Para 7.308 that there will be “no significant residual visual effects remaining at year 15 from public vantage points.” But there will be “some significant residual visual effects on residential receptors”. We agree with this judgement and understand that the effects can only be partly mitigated by new planting to soften views of proposed built form.

In support of this the application has been accompanied by a GI Strategy (ES Part 2 Appendix 3.8). The strategy appears to be well thought through, responding to the historic, ecological, and topographical constraints of the site. Consideration has been demonstrated for surface water with the proposed use of permeable materials, swales and attenuation basins provided on site to deal with surface water runoff at source.

Figure 3.8 Green infrastructure Plan illustrates the proposed network of green spaces which will be linked with vegetated wildlife corridors, allowing pedestrian and cycle movement through and around the site. Further opportunities to link into existing settlement and employment areas have also been identified and further investigation would be encouraged. As the design develops and being conscious of topography, we would insist that accessibility standards are met.

The scheme provides for play in the form of LEAP, LAP and play on the way features. There is ample opportunity for informal play along the green corridors and central POS. Walking routes have also been proposed and a trim trail for leisure use, which is supported.

The need for acoustic mitigation from the A14 has been highlighted and fencing has been put forward as a solution. This will require a strong landscape detailing to soften the appearance when viewed from the west and north-west.

If minded for approval, we would advise the following recommendations are taken into consideration:

- We note the proposed use of wildflower meadow in the more natural POS areas. The areas identified on the plan as amenity grassland should be flowering lawns, however some areas of closer mown grass maybe appropriate for sports area and small ornamental/feature areas
- The proposal states that native trees and shrubs will be used across the site. This is welcomed. We would discourage the use of single species planting or the same planting mix used across the whole site. We would encourage the use of several mixes which are specific to their location on site e.g. a mix for the plateau area and a mix for the lower slopes which would have species which are well adapted to the prevailing ground condition and able to support the wildlife present.
- The use of permeable surfaces is encouraged. Further details are required to ensure that the materials are consistent in appearance with the vernacular. Given that this development will become the interchange between the developed settlement and rural Suffolk we would expect chosen materials to be sympathetic to this character.
- A landform strategy outlining how the landscape, roads and buildings are related to the topography will be useful; details such as cut and fill and retaining structures should be considered fundamental in any future submission.
- Management of POS needs to be considered from the outset, along with the management of the land surrounding Red House farm to ensure a cohesive approach. Traditional management methods such as cattle grazing should be considered under further consultation with the Ecology officer.
- In order to ensure key structural / screening landscape planting is carried out at the earliest opportunity and in the interest of the landscape character and setting of heritage assets we would advise that advanced planting is proposed on site boundaries and within public open space such as the SuDS area south of Red House Farm.

Recommended Conditions, Landscape Management Plan, Landscaping scheme

Ecology 13/07/2022

No objection subject to securing

- a) financial contribution in line with Suffolk Coast RAMS and
- b) ecological mitigation and biodiversity enhancements

Proposed conditions:

Accordance with Ecological report and recommendations
Environmental Management Plan for Biodiversity
Biodiversity net gain design stage report
Landscape and Ecological Management Plan
Further surveys for protected species
Wildlife sensitive lighting design scheme

Arboricultural Officer 01/06/2021

I have no objection in principle to this application subject to it being undertaken in accordance with the measures outlined in the accompanying arboricultural report. Although a number of trees are proposed for removal they are generally of limited public amenity value and/or poor condition and are not of sufficient arboricultural or landscape importance to warrant being a constraint. If you are minded to recommend approval we will also require a detailed Arboricultural Method Statement, including monitoring schedule, to help ensure harm is not caused to the trees scheduled for retention, this can be dealt with under condition/reserved matters.

Environmental Health – Air Quality 09/08/2022

My comments relating to LAQM in the Babergh district reflect the fact that the existing air quality in the vicinity of the site are within acceptable limits as provided by the UK Government in its Air Quality Objectives (AQO) and that there is sufficient headroom to allow for a large development without the risk of exceeding an AQO. The setting of the site, urban fringe with low density housing set back from major highways mean that any additional pollution that is generated will rapidly dissipate from the source (road) and not result in any significant increases in air quality. That is not saying that the site will not generate additional air pollution – no development of 750 dwellings with associated private cars could ever truly state that it has no impact – but it can be regarded that any such increases are within acceptable limits, and this is recognised in the Air Quality Impact Assessment undertaken by the developer. The consultant providing independent assessment for the applicant (MLM Consulting Engineers, now SWECO) have undertaken a detailed assessment of air quality (reference : 66201572-MLM-ZZ-XX-RP-J-0001) and subsequent addendum letter (ref : 66201572-SWE-ZZ-XX-TN-J-0005-P01) at a variety of locations within the district in and around the site using various scenarios of development but assessing the cumulative impact of the scheme and all show that the impact is at worst “negligible” when set against Environmental Protection UK impact parameters and I do not seek to challenge this conclusion.

In light of the fact that any development will by its very nature generate additional air pollution it is imperative that any such development minimises its impact through sustainable transport, service allocation etc and this is a gap that has been identified by officers at Ipswich Borough Council who note that the site provides little in the way of on site service provision and doesn't provide an obvious safe and accessible method of commuting to one of the main employment bases in Ipswich town centre and this is a position with which I can concur. Given the proximity of the site to essential services in Ipswich town centre it would seem as though this is an opportunity that is being missed by this development that will have concomitant, albeit unmeasurable, impacts on air quality and a host of other health metrics

I would note that one key future proofing measure that must be included in this development is the provision of EV charging infrastructure which is essential as we transition to zero tailpipe emission transport and by the time these houses are constructed and first occupied the adoption of EVs will be such that charging infrastructure will be essential. I believe that my colleagues dealing with Sustainability consultations will have picked this up and I would support any condition that they recommend securing such provision.

Officer Note: SCC Highways comments provide updated information in respect of the travel plan to be secured, and Ipswich Borough Council have been involved in discussions with regards impacts on the Borough.

Environmental Health – Noise/Odour/Light/Smoke 21/06/2021

Environmental Protection have no objection in principle but have concerns with regards to road traffic noise and Odours from the Anglian water Sewage treatment Works in Church Lane. These matters were raised during the pre-application discussions and the applicant has provided detailed assessments of both noise and odours. The application is for the dwellings is an Outline application and as such these reports make assumptions on potential dwelling layout and the conclusions can be used to inform the future design at the Reserved Matters Stage.

Noise

Cass Allen (acoustic Consultants) have undertaken a detailed and thorough noise survey of the site and applied modelling to the site as a whole to inform an Acoustic Design Statement (ADS) recommending mitigation features and design principles to be employed at Reserved Matters stage.

Section 4 of the report recommends mitigation measures to provide mitigation to the residential dwellings. Paragraphs that a 4m Acoustic Barrier is incorporated along the western edge of the development to shield against noise from the A14. This is described in paragraphs 4.18 to 4.20 and shows a significant reduction in noise. This can be seen in Figures 6 and 7. This acoustic Barrier should be required by condition which also requires the final design to be agreed in writing.

Although there is a significant noise reduction from the acoustic barrier it shown that there will still be properties exposed to noise in excess of recommended levels. Internal noise level design is discussed 4.21 to 4.42. As the final design hasn't been selected yet it is not possible to give the detailed measures. However the design principles are laid out in the ADS which shows that mitigation to suitable levels is achievable to meet the relevant standards and guidance. The final mitigation design for windows and ventilation to properties can be agreed at the reserved matters stage.

The development is proposed to include a school near to the A1071. Schools are also considered to be noise sensitive dwellings., The ADS has discussed this in section 5 of the report and references the Building Regulations Part E and BB93 as a design guide for schools with a recommendation for details to be submitted at a later date when the design is known. This can be required by condition. The report should also have consideration of the Institute of Acoustics & Association Of Noise Consultants 'Acoustics of Schools – A design Guide' as well as BB93, this document gives some guidance on external space noise standards.

Odour

Due to concerns over odours from the existing Sewage Treatment Works impacting proposed dwellings, MLM Consulting have produced a Qualitative Odour Impact Assessment based on the indicative layout showing no residential dwellings being located within 400m of the Sewage works. The impact assessment has identified that there is a low risk of a slight adverse impact which based on the appropriate guidance from the Institute of Air Quality Management is deemed to be not significant. Providing the design does not

change and bring residential dwellings closer to the works, it is agreed that there is no significant impact and as such no mitigation for odours is necessary.

Environmental Protection team therefore have no objection in principle subject to the following conditions being applied should permission be granted.

Construction working hours
Construction method statement to be agreed
No burning
Acoustic barrier details agreed and implementation
Noise report and mitigation prior to reserved matters
Acoustic Design Statement prior to reserved matters for school

Environmental Health – Land Contamination 14/06/2021

Having reviewed the application and supporting Phase I and II report by Geosphere Environmental (reference: 3309,SI/SITEINV/CA,SG/11.12.18/V1 dated 11th December 2018) I can confirm that I have no objection to the proposed development from the perspective of land contamination.

Environmental Health – Sustainability 16/06/2021

Condition requested.

Public Realm 15/06/2021

Public Realm Officers have no objections in principle to this development. The outline plans show significant areas of public open space and amenity land. It is important the play provision is carefully considered with a development of this scale and it is anticipated that provision for both younger children and teenagers are incorporated into the design for the open spaces

B: Representations

At the time of writing this report at least 55 letters/emails/online comments have been received. It is the officer opinion that this represents 55 objections, 0 support and 0 general comment. A verbal update shall be provided as necessary.

Views are summarised below:-

No local need
Loss of agricultural land
Risk of flooding to neighbours
Drainage strategy not adequate
Impact on wildlife
Light pollution
Air pollution
Traffic
Lack of buses
Lack of cycle infrastructure
Impact on landscape and Special Landscape Area
Loss of countryside
Lack of clarity of building sizes and planting
Density, out of keeping

Overlooking
 Impact on infrastructure
 Lack of community facilities
 Lack of medical services
 Lack of employment land provision
 Primary school provision inadequately defined
 Cumulative impact
 Too many houses
 No consideration of Sproughton NP Design Codes
 Three and two and a half storey homes not in compliance with NP
 Crowded conditions
 Not included in local plan/premature
 No masterplan
 Previous refusals
 Adverse impact on Grade II Listed Red House and associated listed barn and their setting
 Impact on Chantry Park and Springvale Farm
 Coalescence with Sproughton
 Not acceptable without at least 35% affordable housing
 Impact of construction works

(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

REF: DC/19/00454	Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Regulation 6 (Request for a Screening Opinion)	DECISION: EIA 14.02.2019
REF: DC/19/02571	EIA Scoping Opinion for 800 dwellings. (Wolsey Grange 2)	DECISION: EIA 16.08.2019
REF: DC/21/02671	Outline planning permission (some matters reserved, access to be considered) Town and Country Planning Act 1990 - Erection of up to 750No dwellings, and up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements (accompanied by EIA Statement).	DECISION: PCO
REF: B/15/00993 (Wolsey Grange 1 Site)	Hybrid planning application in relation to: Outline planning consent (all matters reserved) for 29.7ha of mixed use development, comprising: - the erection of up to 475 dwellings (10.74ha); - 4ha of employment land, to include A3, A4, A5, D1, D2 and Sui Generis use classes; - 1.2ha of land for primary education use; - public open space, including childrens' play areas; and, -	DECISION: GTD

associated landscaping, sustainable urban drainage systems and highway improvements. Full planning consent for residential development of 11.83ha of the outline application site, comprising: - the erection of 145 dwellings; - public open space and children's play areas (LEAP+); - green infrastructure, hard and soft landscaping, and boundary treatments; - sustainable urban drainage systems and pumping station; - highway improvements; and, - an electricity substation.

REF: B/86/01144

(Land between A 45 By-Pass And Chantry Park)

OUTLINE - RESIDENTIAL, PUBLIC PARK, SHOPS, PUBLIC HOUSE, MEDICAL CENTRE, SUPERMARKET, EXHIBITION CENTRE, HI-TEC BUSINESS PARK AND CONSTRUCTION OF NEW ROADS AND ALTERATION TO EXISTING ROADS

DECISION: REF APPEAL DISMISSED

Application B/86/01144/OUT was made for residential, public park, shops, public house, medical centre, supermarket, exhibition centre, business park and construction of new roads and alteration to existing roads. The site was land to the south of the River Gipping, east of the A45 by-pass, north of A1214 London Road and West of Chantry Park. The site extended to 178 acres, or 72 ha, compared to 53.01 ha currently.

This application was refused on 14th May 1987 as contrary to the County Structure Plan and proposed alterations to the County Structure Plan with regards to the scale and location of future large-scale development and as the proposal would not maintain the open character of land which separates the villages around Ipswich from each other and from Ipswich itself. In addition, as the application would break through the strong existing visual edge to Ipswich into an area of attractive countryside, the environment of which would be unacceptably disturbed and as significant views into the area would be seriously and adversely affected. The loss of agricultural land, material increase in traffic using existing roads which do not have sufficient capacity and that the application did not demonstrate that the site can be satisfactorily drained to public sewerage were also reasons for refusal.

The Council's refusal of permission was appealed and in the combined appeal (APP/D3505/A/87/071452, APP/D3505/A/87/070367 and APP/D3505/A/87/071213), which was dismissed on 16th August 1988, this concluded on the issues of the likely effect of the development on the character of the site and its surroundings and the loss of agricultural land as follows:

Character and Surroundings:

In assessing the weight to be given to the objections I have identified I place the greatest emphasis on those interests of acknowledged importance which would suffer permanent and irreparable harm. Foremost among these is the loss of the large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich. This open land also plays a vital role in protecting the separate identity of Sproughton village. The development of some 1,600 houses on the site, however sympathetically designed, would result in irreparable harm to the characteristics

on which I place a very high value. The development would also detract markedly from the setting of Redhouse Farm, a Grade II listed building.

The objection to the loss of some 178 ac of mainly high quality agricultural land is tempered by the possibility that alternative major housing sites on the fringes of Ipswich (except on the eastern side) are likely to be of comparable land quality. The objection to increased traffic generated by the site is likely to be common to all major housing developments in fringe locations. However the Chantry Vale site has certain locational advantages which would enable the traffic impact to be minimised by the provision of various road improvements. In my judgment the benefits associated with the proposed development – the provision of facilities, the new distributor road, the country park and generous landscaping – would not compensate for its adverse effects.

Agricultural Land Loss

The Secretary of State is aware that both sites comprise mostly Grade 3 and 3a land and therefore fall for consideration under the terms of Circular 16/87, which states that the best and most versatile agricultural land has a special importance. However, he is also aware from the land classification map that Ipswich is surrounded by land of comparable quality to each of the sites and that it is unlikely that a major housing site will be found without similar agricultural constraints. In this situation the weight that can be awarded to the MAFF objection is less than might be the case elsewhere and he agrees with the Inspector that land of comparable quality will probably have to be sacrificed, if the housing provisions for the Ipswich Policy Area are to be realised.

Although previous planning decisions can be a material consideration, these findings were made in relation to a larger scheme of development on a site that is not exactly the same as the current application site. The planning policy background has clearly changed since this time and members should assess for themselves the likely impact of the proposed development having regard to current policy and the context of the site as it is today.

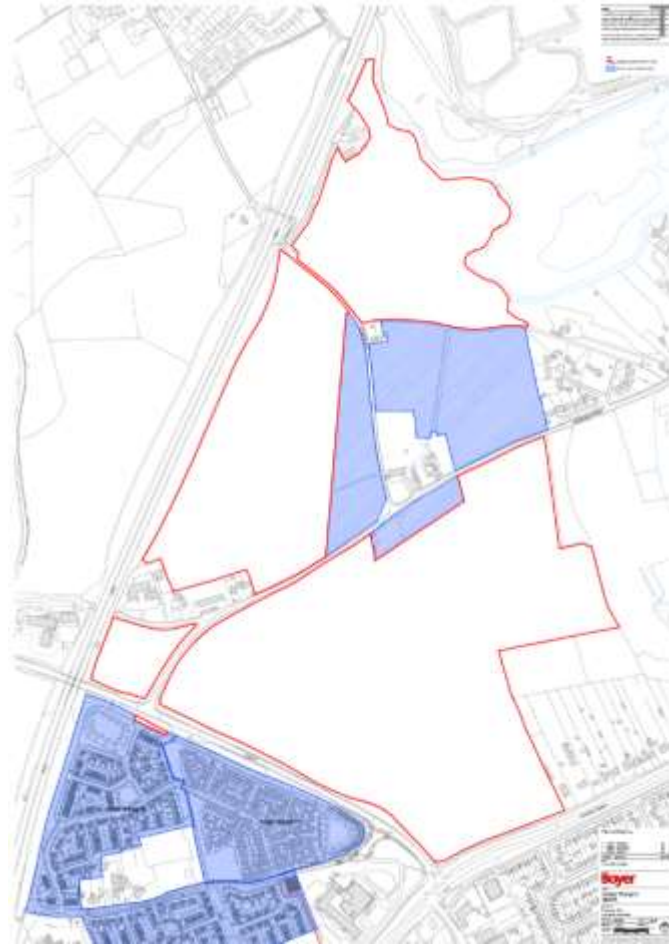
PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

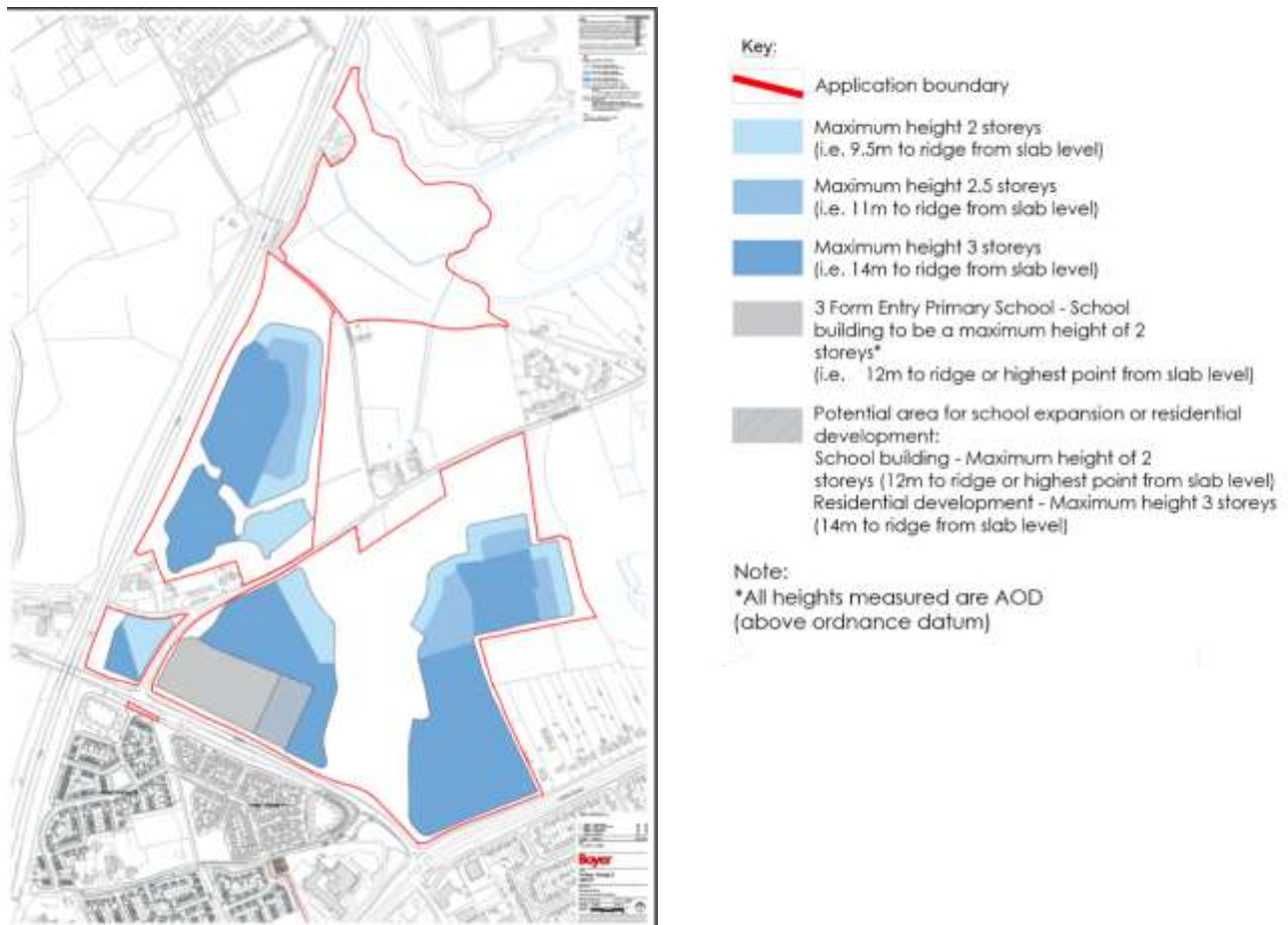
- 1.1. The application site is situated to the south of Sproughton, bounded to the west by the A14, south by the A1071 and east by the A1214 London Road. The northern boundary of the site extends towards the River Gipping. The site is bisected by Hadleigh Road, which runs from the north-eastern to south-western corners of the site. The site slopes down from the A1214 and A1071 towards the river Gipping and is currently agricultural land.
- 1.2. The site surrounds the Grade II listed Red House Farm, along with the cluster of buildings at First Strokes swim school and Milk Shed café including Springvale, Grade II listed. To the eastern boundary the site abuts Chantry Park including various Grade II listings, as noted in the Heritage consultation response. Poplar Farm, also Grade II listed, is situated along Poplar Lane, adjacent to the Phase I of Wolsey Grange. The application site forms part of the Gipping Valley Special Landscape Area.
- 1.3. The wider surrounding area is varied in character, with the urban edge of Ipswich to the East of the site, and Chantry Park in the intervening space between the site and that built up area of Ipswich. To the South the site adjoins the first Wolsey Grange site, with the Interchange Retail Park adjacent to the A12/A14 junction. To the West is the A14, Sproughton village and subsequently open countryside.

2. The Proposal

- 2.1. The proposal is outline, with all matters other than access reserved. The proposal is for the erection of up to 750 dwellings (of which 35% would be for affordable tenures), including 3ha of primary education land, open space, SuDS, landscaping and highway works.



- 2.2 The site falls into four different areas due to the existing highways network. The main site area is the southernmost area, bounded by the A1071 to the south and is proposed to include the 3ha primary school site and residential development. Adjacent to this is a smaller area, between the A1071, A14 and Hadleigh Road. To the north of Hadleigh Road is a further area of the site, bounded by Church Lane. Each of these are proposed for development. The northernmost part of the site, towards the River Gipping is a final part of the site, proposed for open space.
- 2.3. The application site extends to 53.01 ha, with 18ha proposed for residential development, with 3ha for the school site. Gross density is 14 dph, whilst net density is 40 dph.
- 2.4. The proposal includes a parameters plan indicating proposed storey heights, as shown in the plan below.



2.5. The matters of appearance, scale, layout and landscaping are reserved.

3. The Principle Of Development

- 3.1 The starting point for determination of any planning application is the development plan, as identified in Section 38(6) of the Planning and Compulsory Purchase Act 2004. Determination of any application must be made in accordance with the plan unless material considerations indicate otherwise. A key material consideration is the National Planning Policy Framework (NPPF), revised in July 2021.
- 3.2 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At paragraph 8, this is defined as meaning that there are three overarching objectives which are interdependent and need to be pursued in mutually supportive ways: economic, social, and environmental. The NPPF goes on to state, however, that they are not criteria against which every decision can or should be judged (para. 9).
- 3.3 NPPF Paragraph 11 states that: c) development proposals that accord with an up to date local plan should be approved without delay; or d) where there are no relevant development plan policies, or the policies which are most important are out of date, granting permission, unless:
i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed;
or ii) any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

3.4 The application has been assessed against the development plan – which comprises the remaining saved policies of the Babergh Local Plan Alteration No.2 (2006) and the Babergh Core Strategy 2011-2031 (2014) – as a whole. However, having regard to the application and nature of the development proposed, alongside the locational context and responses received through the consultation, and the key issues identified, the most important policies for the determination of the application are considered to be:

CS1 - Applying the presumption in Favour of Sustainable Development in Babergh

CS2 - Settlement Pattern Policy

CS15 - Implementing Sustainable Development

CS18 - Mix and Types of Dwellings

CN01 - Design Standards

CR04 - Special Landscape Areas

CN06 – Setting of Listed Buildings

3.5 Taken in the round, these are the most important policies for the determination of this application and are up to date when viewed as a whole, although as explained below policy CS2 is afforded less than full weight.

3.6 At the current time the District has a five-year housing land supply position (7.13 years' supply according to the council's most recent housing land supply position statement) as required by paragraph 74 and paragraph 11, footnote 8 of the NPPF. Notwithstanding this, paragraph 219 of the NPPF states that the weight attributed to policies should be according to their degree of consistency with the NPPF. The closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.

Emerging Joint Local Plan

3.7 The Babergh and Mid Suffolk Joint Local Plan (JLP) was formally submitted to the Secretary of State for Housing, Communities and Local Government for independent examination on 31st March 2021.

3.8 Following an exploratory meeting with the examining Inspectors on 16th December 2021, it has been proposed to progress the JLP as a 'Part 1' local plan, containing the council's vision and objectives for the district together with strategic and local policies. This will be followed by the preparation and adoption of a 'Part 2' local plan, including an up to date settlement hierarchy, distribution of housing allocations and specific site allocations, as soon as possible. Main modifications on the JLP Part 1 are awaited and it had been anticipated that public consultation on those proposed modifications will be undertaken in autumn 2022, to be followed by further hearing sessions over the winter. The recently agreed Local Development Scheme anticipates adoption Spring 2023. It is accepted that the main modifications have yet to be published notwithstanding the LDS publication. Such delays are a normal part of the plan-making process.

3.9 Overall the JLP Part 1 is not considered to play a determinative role in the consideration of this application at the present time. This is because, whilst of somewhat advanced preparation, a number of policy modifications to the Part 1 plan are required and the outcome of consultation and the Inspectors' views on those modifications are not yet known. Further policy revisions may be necessary and additional hearing sessions are likely. The Part 2 JLP is not anticipated to be ready for submission until winter 2024. Prematurity as a reason for refusal is therefore not presently a factor in this case. There is a requirement for future housing land provision, both to be planned, and delivered notwithstanding the Development Plan, and the pipeline of supply towards continuing to deliver housing land is relevant to the consideration of this application.

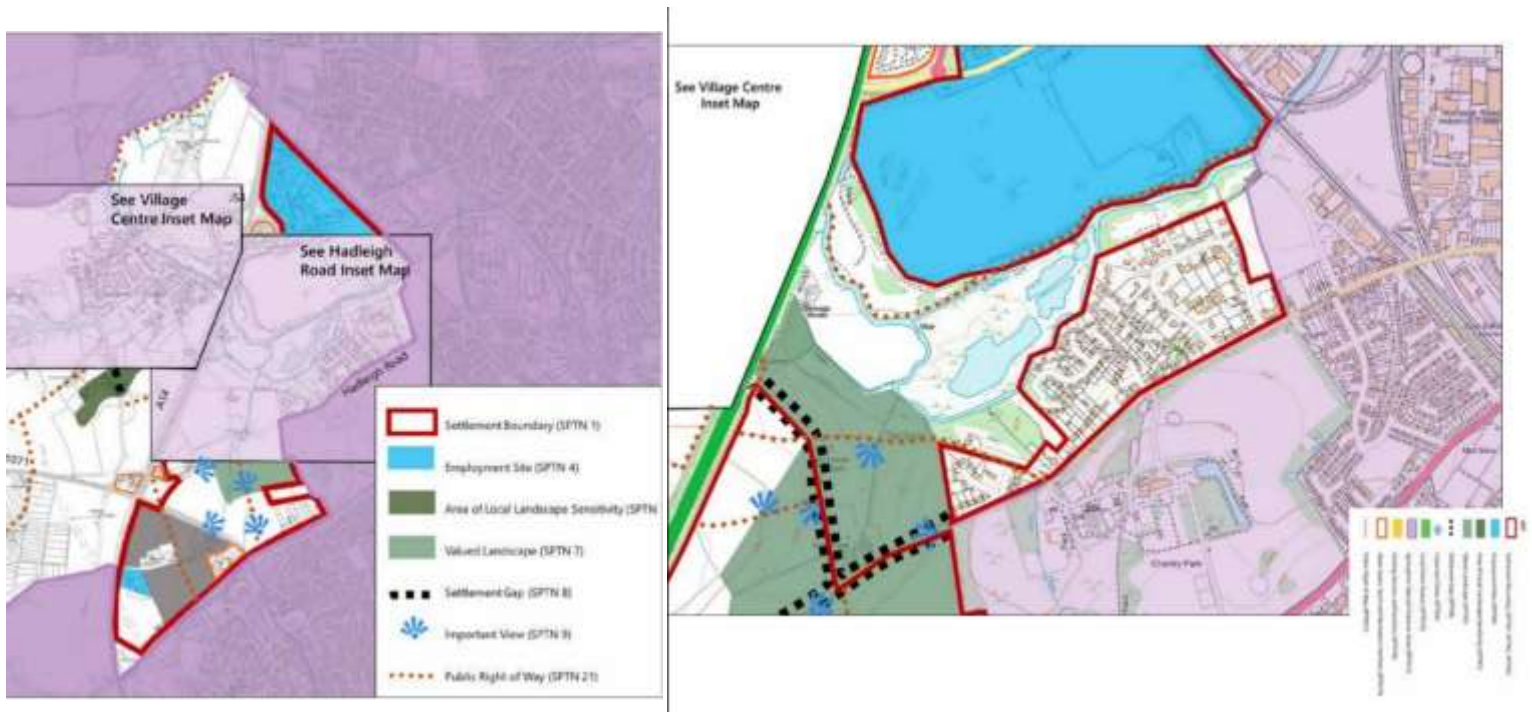
3.10 However, whilst the submitted JLP previously proposed to allocate the site for residential purposes, this application nonetheless remains to be considered in the context of the current development plan.

Emerging Neighbourhood Plan

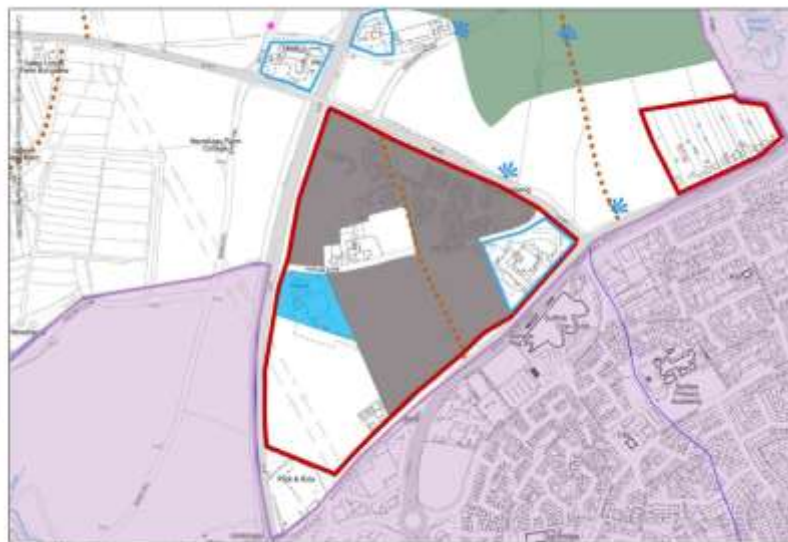
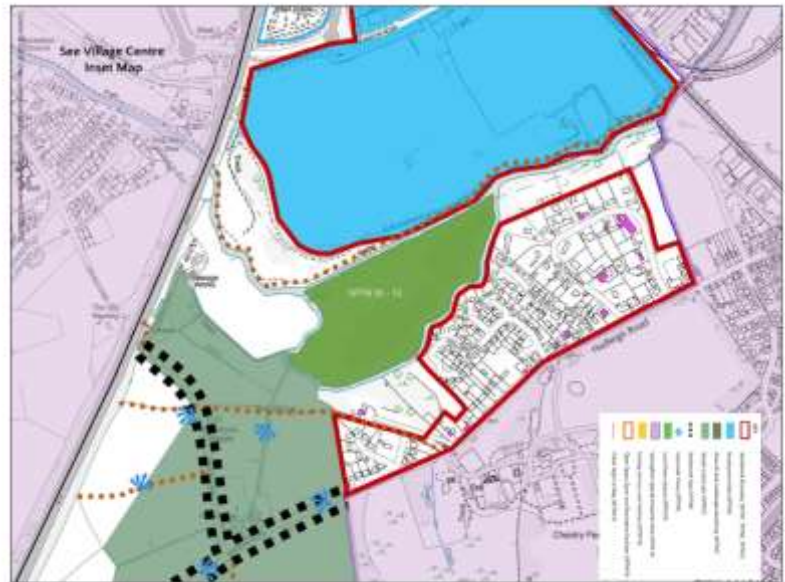
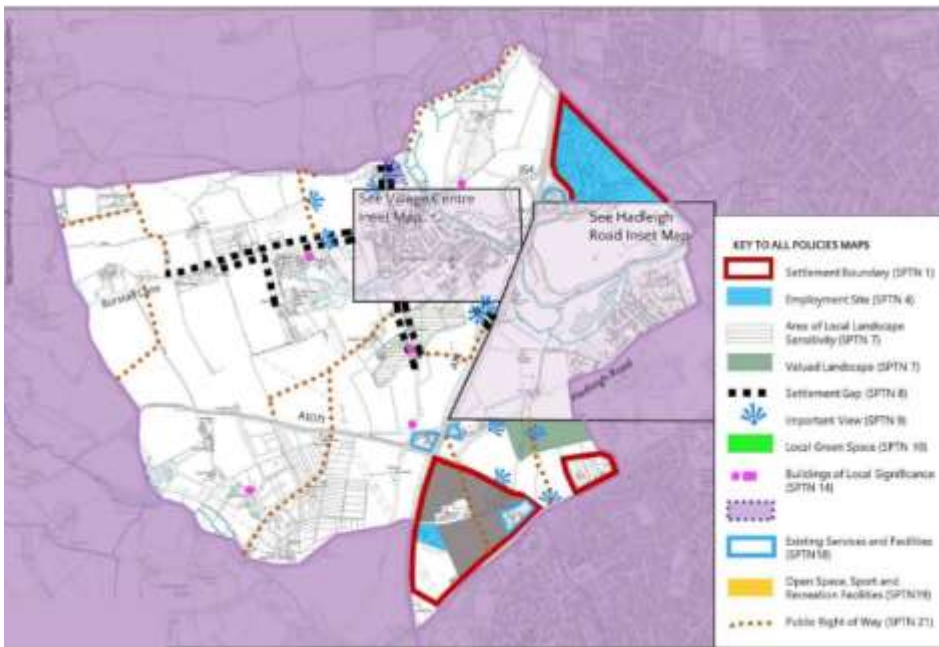
3.11 Sproughton Parish Council have a submission draft neighbourhood plan which is now the subject of consultation. The plan has changed over time, with some details provided below. The current published version of the emerging Neighbourhood Plan is the relevant version.

3.12 The submission draft Sproughton Neighbourhood Plan includes at SPTN1 a settlement boundary as defined on the policies map which identifies the extent of land considered to be required to meet the development needs of the parish. SPTN1 notes that proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with the national and district level policies.

3.13 The policies map at the end of the Neighbourhood Plan originally included the Parish Wide and Ipswich Fringe Policies Map as below, which shows part of this application site as outside the settlement boundary and part of it inside the boundary (the part of the site outside the boundary predominantly relates to the areas of land proposed to be open space).



3.14 Revisions have since been made which have amended the NP following this consultation. This has been submitted to BDC and is now at public consultation until 3rd February 2023. This removes the site from the previously proposed settlement boundary, as shown in the plans below.



- 3.15 Paragraph 6.1 sets out the reasoning for not needing to allocate any new housing sites, given that the minimum requirement figures from the JLP are now indicative only.
- 3.16 Notwithstanding the above changes to the neighbourhood plan that is now submitted, the plan is now at publication stage and is required to undergo examination and potential modification. It is, not an adopted document, and the plan has limited weight.

The National Planning Policy Framework

- 3.17 The National Planning Policy Framework (“NPPF”) sets out the Government’s planning policies for England and how they should be applied. It is a material consideration for decision-taking purposes and can affect the weight to attach to policies of the development plan. It cannot, however, alter whether there is a conflict with the development plan nor undermine the statutory primacy that a development plan holds.
- 3.18 The operation known as the “tilted balance” (under paragraph 11d of the NPPF and policy CS1) engages where, inter alia, the most important policies for determining an application are out of date. The Council can demonstrate a deliverable housing land supply of over 5 years and continues to pass the Housing Delivery Test. Taken in the round the most important policies for determining the application are considered to be consistent with the NPPF and up to date.
- 3.19 Paragraph 219 states that existing policies should not be considered out of date simply because they were adopted prior to the 2021 iteration of the NPPF. It goes on to state that ‘due weight should be given to [development plan policies], according to their degree of consistency with this Framework’.
- 3.20 Policies CS1, CS3, CS15, CS18, and CN01, CN06 and CR04 are all considered to be consistent with the NPPF and so should be afforded full weight.

4. Assessment against CS11 and CS7 of Core Strategy

- 4.1 Policy CS11 is relevant to proposals around core and hinterland villages, which the application is not. Whilst Sproughton itself is listed as a Hinterland Village by CS2, it is separated from the application site by the A14.
- 4.2 Core Strategy paragraph 2.1.4.1 confirms *“there is a distinct difference between the parish and the village of Sproughton. The built up areas on the urban edge of Ipswich that are in the parish of Sproughton are not considered to be within or part of a hinterland village, and will be considered as part of the urban area of Ipswich.”*
- 4.3 Core Strategy paragraph 2.8.3.2 similarly continues:

“Accommodating growth in Babergh’s Ipswich Fringe is difficult, particularly as the geography of this area does not fit well within administrative boundaries. The village of Sproughton is a distinct settlement west of the A14 and is included in the list of Hinterland Villages. However, the built-up areas on the edge of Ipswich in the parish of Sproughton cannot logically be considered as being in the countryside, and will therefore be considered as part of the Ipswich urban area for the purposes of planning policy. Similarly Pinewood has not been included as a Hinterland Village in Policy CS2 as although it is a distinct neighbourhood/community it is also part of the Ipswich urban area, and will be considered as such for planning policy purposes.”

- 4.4 Policy CS7 provides an allocation of the Babergh Ipswich Fringe on the neighbouring site known as Wolsey Grange, granted permission for 475 dwellings (B/15/00993), and policy CS8 allocates Sroughton Strategic Employment Site Allocation, also in the Ipswich Fringe. The Glossary defines 'Urban Fringe' as 'Predominantly open land on the edge of an existing urban area'. The preamble to CS7 includes at paragraphs 2.8.3.7 to paragraph 2.8.3.9 reference to this application site in its consideration of the Wolsey Grange Babergh Ipswich Fringe:

"The remaining area of open land between the A1071 and the western edge of the Ipswich urban area (adjacent to Chantry Park) is of a larger scale and of greater scenic value. It has more complex development issues, is of unproven availability / deliverability at this time, and is not considered to be sequentially preferable overall for such reasons."

- 4.5 Clearly the site is not a built-up area, but nonetheless sits between the allocation of CS7 and Sroughton employment allocation, and is separated from the village of Sroughton west of the A14. Noting that Pinewood is not included as a Hinterland Village but included in the Ipswich urban area, along with the Ipswich Fringe CS7 allocation, the site falls within a cluster of development which is considered to be Ipswich Fringe to the east of the A14, not within the countryside, to the west of the A14.

- 4.6 In the light of this it is credible to conclude that the site is within the Babergh Ipswich Fringe area, and not subject to CS11. Indeed it is noted that the 'Babergh Ipswich Fringe (edge of urban area)' is listed as a town/urban area in policy CS2, wherein CS11 would not apply.

- 4.7 Core Strategy Policy CS7 allocated the neighbouring Wolsey Grange 1 site, which has planning permission and is currently being built out. As part of this allocation however there is reference in the pre-ambles to this application site, between the A1071 and the western edge of Ipswich. At the time of the CS7 allocation this application site was considered to have more complex development issues, be of unproven availability/deliverability and not sequentially preferable. The Core Strategy does however recognise at 2.8.3.9 that:

"Whilst there is clearly the potential and the capacity for this undeveloped, largely agricultural land to make a major contribution to the green infrastructure and other needs of the area, especially in providing for recreation and open-space needs, this may only be able to be delivered as part of a comprehensive plan for the whole area that would be likely to include some development of the urban edge. However, the scale and scope of this is larger than Babergh's requirements for this current plan period and an allocation in this area at this stage appears premature and may lead to an unacceptable piecemeal approach that would be damaging to a comprehensive plan for its future."

- 4.8 Whilst the Wolsey Grange 2 site was not allocated in the Core Strategy in 2014, it was nonetheless considered, and had deliverability and availability concerns at the time of that plan and needed master planning as an area. Although the entire Wolsey Grange site was not allocated under CS7 and has been split into Wolsey Grange 1 and 2, the application site includes the remainder of the wider area and is capable of being planned accordingly. Noting that the school would be moved from the Wolsey Grange 1 site, to create a larger primary school, for example, allows the entire Wolsey Grange site to be considered and function as one wider area. Similarly whilst no employment or services are provided on this site, these were planned for on Wolsey Grange 1, so that the site could be considered to work as one. Nonetheless, CS7 does not allocate the application site, and as such this policy is not considered with regards to the principle of the proposal. However, the deliverability and availability concerns raised in the pre-ambles to the policy are addressed, along with the comprehensive nature of the scheme. As noted, the site provides significant green infrastructure and open space.

5. Assessment against CS2, CS1, CS15 and CS18 of Core Strategy

- 5.1 Policy CS2 seeks to direct most new development (including employment, housing, and retail, etc.) sequentially to the towns/urban areas, Core Villages and Hinterland Villages identified in the policy. One of the towns/urban areas in CS2 is the Babergh Ipswich Fringe, where the site is located. The policy goes on to say: "In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities as expressed in parish / community / neighbourhood plans." It follows that although the site is in a sequentially preferable location for new development, the proposed development must still be assessed having regard to its particular impacts and benefits.
- 5.2 Policy CS2 has previously been examined through the plan-making process as being consistent with national policy, forming part of the Core Strategy as a post-2012 NPPF development plan document. It provides a strategy for the distribution of development that is appropriate in recognising local circumstances and its overall strategy remains sound. However, in the absence of an allocations document and settlement boundaries review (which has been absent for several years but has in practice been overtaken by the preparation of the emerging Joint Local Plan) it should be afforded less than full weight. This is also the case because national policy continues to require that policies are tested for their consistency with the NPPF. The 'exceptional circumstances' threshold referred to above is not entirely consistent with the NPPF and this has been recognised repeatedly in appeal decisions, notably in the Secretary of State-recovered appeal decision APP/D3505/W/18/3214377 for 150 dwellings in Long Melford, following the most recent NPPF publication. That said, the exceptional circumstances test in policy CS2 does not apply to development within the Babergh Ipswich Fringe.
- 5.3 Policy CS2 carries reduced weight because of the age of the settlement boundaries and absence of allocations document, and its inconsistency with the NPPF, although the overall settlement pattern strategy remains sound. Given the site falls within the Babergh Ipswich Fringe policy area the underlying aims of CS2 are broadly met.
- 5.4 Decisions in favour of securing development that satisfies the objectives of sustainable development and the need for a balanced approach to decision making are key threads to Policy CS1 and CS15 of the Core Strategy. These policies are consistent with the NPPF and carry full weight, and form part of the principal assessment framework for the determination of the application. Policy CS18 is also a key consideration given the scale of development proposed. The detailed requirements of these policies are considered below:

6. Policy CS1 Presumption in Favour of Sustainable Development

- 6.1 Policy CS1 takes a positive approach to new development that seeks to secure development that improves the economic, social and environmental conditions in the Babergh District. Consistent with the NPPF it also applies the 'presumption in favour of sustainable development' which is an operation engaged as a consideration under certain circumstances. The application does not expressly conflict with this policy; the key assessment of the application in principle falling to those other policies assessed within this report.

7. Policy CS15 Sustainable Development

- 7.1 Policy CS15 sets out how the Council will seek to implement sustainable development and requires development to demonstrate the principles of sustainable development. This policy identifies the following areas for consideration, which are numbered separately for ease of reference.

8. Landscape and Heritage

- 8.1 Policy CS15 states:

“j) respect the landscape, landscape features, streetscape / townscape, heritage assets, important spaces and historic views;

In particular proposals should protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Adaptation or mitigation will be required if evidence indicates there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission.”

- 8.2 The NPPF emphasises as a core principle the need to proactively drive and support sustainable development to deliver homes. It states that both the intrinsic character and beauty of the countryside should be recognised and that pursuing sustainable development involves widening the choice of high quality homes. The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. Furthermore, Policy CS15 of the Core Strategy requires development proposals to protect the landscape of the district.
- 8.3 The proposal has been subject to a Landscape Visual Impact Assessment (LVIA), which has been reviewed with our Landscape Consultant. They confirm that they are satisfied with the scope and geographic context of both the landscape and the visual baseline studies which form the basis for the assessment of effects. They confirm that the site falls within three landscape character types, Plateau Farmlands, Rolling Valley Farmlands and Valley Meadowlands, based on the historical land use of the area, which has changed with recent residential and commercial development in the surrounding area. This development has impacted the setting of the application site and thereby reducing the quality and value of this landscape.
- 8.4 The impact on the Rolling Valley Farmlands is considered by Place Services Landscape to be Moderate Adverse. With the undulating landscape the visual impact of new vertical elements is increased by this landform. As such new buildings are likely to have a significant impact on the character and visual amenity on the valley side, even with the proposed mitigation measures.
- 8.5 Overall the proposal has been considered to result in no significant residual visual effects at 15 years from public vantage points, but there will be some residual visual effects on residential receptors. Essentially the impact on neighbouring residential properties can be only partly mitigated by planting to soften views of proposed built form, and the surroundings will change as a result of the proposal, however the overall landscape impact is mitigated. The landscape mitigation can be secured by condition, and in addition further landscaping secured through future reserved matters to ensure that there is further softening sought which is specific to each part of the development.
- 8.6 The scheme provides for a significant amount of open space on site, with 28.78ha of open space, including public open space, amenity and natural greenspace, LAP, LEAP and play on the way features, as well as walking routes and trim trail for leisure use. It has been confirmed with Public Realm that all open space requirements for the site are provided on site, with the exception allotments, but Sproughton and Gipping Wards already have more than required. The provision on site is otherwise in excess of the required provision of open space.

- 8.7 Local Plan Policy CR04 and Core Strategy Policy CS15 provide protection for Special Landscape Areas, including this site within the Gipping Valley. Policy CR04 only permits proposals in special landscape areas where they, maintain or enhance the special landscape qualities, and are designed and sited so as to harmonise with the landscape setting. As noted above the LVIA secures protection of landscape views so as to provide for no significant visual effects at 15 years from public vantage points, such that the proposal is considered to have been designed to blend with the landscape setting, and as such is not considered to be contrary to these policies.
- 8.8 Further consideration in respect of the Special Landscape Area follows from the Important Views recognised by Sproughton Neighbourhood Plan, which although only of limited weight due to its current status nonetheless recognises these specific views which were assessed in order to draft policy SPTN 9. The Landscape Assessment for the Neighbourhood Plan includes the important views particularly relevant to the site as Local Area 4 Chantry Vale and Hermitage Farm. The changes to avoid to afford protection of these views is considered by the Appraisal to include:
- Housing estates with single housing types, which contrast with the organic and eclectic styles and orientation of buildings in the village
 - New development which lacks rural streetscape with limited open space, grass verges or distinctive vistas
 - Use of close boarded fencing to define property curtilage where this abuts roads/lanes or the open countryside
 - Loss of open valley sides which form a setting to settlement
 - Development and land use change which causes fragmentation of wildlife corridors
 - Loss of areas of open space within the fabric of the settlement which add to local sense of place and streetscape
 - Proliferation of pylons and overhead wires which interrupt views and create visual clutter
 - As hoc incremental development along rural lanes, including urbanization through street lighting, especially in areas identified as important gaps between settlements
 - Development within the setting of important heritage assets which undermines the landscape setting and significance of these features and their contribution to local distinctiveness
 - Loss of mature street trees as a result of lack of management and no succession planting.

Whilst development guidelines to inform new development include:

- Ensure new development reflects the dispersed and varied vernacular of the area, including a mix of farm buildings, larger properties within grounds or small-scale terraced cottages
 - Retain open valley sides which form a setting to Sproughton and reinforce its small-scale rural character
 - Pay particular attention to curtilage treatment and avoid urbanisation of rural lanes or loss of character along village streets
- 8.9 Neighbourhood Plan policy SPTN 9 considers important views. It requires assessment by LVIA, which has been provided for this application and assessed as noted above. As an outline application the scale, materials and location are to a large degree subject to a future reserved matters application, but the LVIA confirms the extent of likely effect and suitable mitigation. It is further noted that a large part of the site is retained, and made available as public open space, both preserving the LVIA agreed views, and opening them for further public benefit. Similarly points set out in landscape appraisal, particularly as noted above, are either addressed by the LVIA, considered in the relevant sections below, or will fall under any future reserved matters applications,

and can be considered there accordingly. With respect to the details required on design, these can be appropriately considered at the reserved matters stage.

- 8.10 As noted in the previous appeal decision the site is best and most versatile (BMV) agricultural land, but so is much land in the area, and the combined appeal decision (APP/D3505/A/87/071452, APP/D3505/A/87/070367 and APP/D3505/A/87/071213), found that it is unlikely that any major housing site will be found without similar agricultural constraints. A condition is proposed for a scheme of soil management, to ensure efficient use of soil resources on site where these can be put to alternative use.
- 8.11 With regards to heritage, the application site is in an area with several heritage assets which will be affected by the proposal, particularly Grade II Listed Poplar Farmhouse, Grade II Springvale, Grade II Chantry Park, which is designated as a park of special historic interest ('registered park and garden'), The Chantry, Gatehouse and entrance piers to Chantry House Grade II and Red House and associated barn both Grade II.
- 8.12 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. What this means is that a finding of harm, even less than substantial harm, to the setting of a listed building is something that must be given "*considerable importance and weight*" in the balancing exercise. This is reflected in the advice in paragraph 199 of the NPPF that "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).*" Consequently, any harm to, or loss of, the significance of a designated heritage asset from development within its setting should require clear and convincing justification (NPPF, paragraph 200). Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (NPPF, paragraph 202).
- 8.13 The applicant has provided a built heritage statement as part of its environmental statement. This has been considered by Place Services, who conclude that the proposed development would cause a low level of harm to the setting of Springvale, removing it further from its formerly agrarian setting, resulting in a low level of less than substantial harm to Springvale's significance. There would be no harm to the significance of the Listed Gatehouse and The Chantry, but encircling the parkland with development on its western edge will remove its wider setting and the appreciation of the asset, resulting in less than substantial harm to the significance of the parkland in the middle of the scale. There would also be the loss of the open, agricultural setting of the Red House and its associated listed barn, causing a medium to high level of less than substantial harm to the significance of the Red House and barn. On this basis it is noted that the Heritage Officer is unable to support the proposals. In accordance with the advice in the NPPF it will be for members to weigh the harm against the benefits of the proposed development, giving the weight indicated above to the less than substantial harm.
- 8.14 The Suffolk Preservation Society considers the proposal to have the potential to cause medium to high levels of less than substantial harm. Furthermore Sproughton Parish Council raise concerns that the BMSDC commissioned JLP Historic Environment Appraisals Stage 2: Heritage Impact Assessments for Preferred Sites by LUC says that development on the valley side/ridge to the West and behind Red House Farm would be unacceptable due to its harmful impact as a backdrop to

Red House Farm and recommends that development on the valley side further North on that Valley Side would be unacceptable as it would then necessitate access via Church Lane (now a 'Quiet Lane') which should be protected. No access via Church Lane other than via Public Right of Way is proposed, and this can be further secured within future reserved matters consideration.

- 8.15 However, the JLP Historic Environment Appraisals Stage 2: Heritage Impact Assessments for Preferred Sites by LUC splits this into areas of harm. To Chantry Park harm is low-medium, only marginally affected. To Red House and Barn South East of Red House due to the scale of change the significance of the asset would be harmed, but not substantially, whilst Springvale was not considered to be harmed. There are clear differences in the assessments, which will be the case both over time but also as more information as to the extent, limitations and mitigation associated with the development are known. In particular paragraph 2.22 of the Preferred Site HIA is clear that *"no assumptions have been made with regard to the potential for mitigation to be applied; this would require detailed, site-specific understandings of both heritage assets (their significance and the contribution of setting to that significance) and of development proposals to understand the potential interactions and opportunities to avoid or mitigate harm."* It is of note that the site as potential allocation LA013 was subject to not just a Strategic Appraisal, but in consultation with Historic England a Stage 2 Impact Assessment was undertaken. Historic England had no comment to make, but advised we obtain our own specialist advice, which has been sought as such. The more recent advice from our Heritage advisors considered the current proposal and mitigation to advise of the overall impact and the proposal is assessed against the relevant policy accordingly.
- 8.16 Clearly the above legislation and policy require great weight to be given to the conservation of heritage assets. Nonetheless, where less than substantial harm would be caused, the NPPF states that the harm should be weighed against the public benefits of the proposed development. The following are considered to be public benefits which should be weighed in this assessment:

Extensive areas of publicly accessible green space (comprising over 50% of the Site's area)
35% affordable housing provision
Provision of housing, including economic benefits through construction and occupation
2FE Primary School (with additional area reserved for future expansion)
Trim trail equipment/children's play areas
Biodiversity enhancement area, with 18.81% biodiversity net gain
Financial contribution towards a bridge across the River Gipping and provision of landing point
Dwellings built to future Homes Standards (ASHp; triple glazing, wastewater heat recovery, underfloor heating)
PV Panels across the development
A fabric first approach to carbon emission reduction
Highway Improvements (which go beyond mitigation and include ISPA Transport Mitigation Strategy measures):
Offsite highway improvement full details for A1071/B1113/Swan Hill, A1071 junction, A1214 junction
Full details of Hadleigh Road roundabout access and footway, Hadleigh Road central access and footway, Hadleigh Road Northern access and footway.
Visibility splays for Hadleigh Road Northern and Central access
Cross valley cycleway/footway
Hadleigh Road toucan crossing
Cycleway/footway route and bus stop improvements close to A1071
Provision of electric vehicle charging points
Travel plan
Bus stop provision and improvements plan
Improvements to Footpath 14 agreed and implemented

Sustainable travel improvements on the A1214 London Road corridor
Smarter choice contribution for modal shift
Speed limit extension on Hadleigh Road
Traffic calming on Hadleigh Road
Upgrade Sproughton Public Footpath 14 from footpath to bridleway status
Upgrade Sproughton Public Footpath 24 from footpath to bridleway status
Improve Sproughton Public Footpath 24 to and through underpass to make route more accessible
Improve Sproughton Public Footpaths 11 and 12 onto Church Lane
Improve access along Sproughton Public Footpath 11
Bus service improvements

- 8.17 Suffolk County Council Archaeology advise that there are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets, subject to a planning condition for recording.
- 8.18 There are significant public benefits resulting from the proposal, and although the District has a housing land supply at 7.13 years, the development nonetheless also offers future housing land supply and an opportunity to contribute significantly to district housing needs in the absence of an allocations document or settlement boundary review. The ability to demonstrate a 5 year housing land supply is not intended as a cap or ceiling on further housing development.
- 8.19 Furthermore whilst the Council may have a housing land supply there is a continued need for future housing land supply beyond these 5 years. The delivery details submitted with the application sets out a construction programme assuming commencement in 2026, with delivery over 10 years, to completion in 2036, offering housing land delivery beyond 5 years.
- 8.20 In light of these wide ranging public benefits as listed above, the harm to the significance of the affected heritage assets, falling within the bracket of less than substantial harm, whilst still afforded considerable importance and weight, is considered to be outweighed by these benefits.
- 8.21 Local Plan Policy CN06 also offers protection to the setting and significance of listed buildings. It states that new work within the curtilage or setting of a listed building should, inter alia:
Not conceal features of importance or special interest
Be of an appropriate scale, form, siting and detailed design to harmonise with the existing building and its setting
Retain a curtilage area and/or setting which is appropriate to the listed building and the relationship with its surroundings
Use material and components which complement or harmonise with those on the building and the area
Use appropriate detailing, finishes and colours
Respect those features which contribute positively to the setting of a listed building including space, views from and to the building and historic layout
- 8.22 The policy sets out specific requirements to be protected, and does not expressly allow for the weighting approach seen in the NPPF with regards to public benefit. However, overall the protection offered is not specifically contrary to the NPPF, such that weight is given to the protections offered, with the weight reduced without a balancing exercise. As noted above the proposal is considered to fall within the less than substantial harm category, such that some harm will clearly result from the proposal to listed buildings, but this has not been found to be contrary to the NPPF, with the harm weighed against the public benefits.

8.23 Furthermore the proposal is in outline and so many of these points will need to be settled at reserve matters stage. However, subject to this, the proposal is not considered to be contrary to any of these requirements, which will be appropriately assessed and controlled through any reserved matters.

9. Design, Open Space and Green Infrastructure

9.1 Policy CS15 states proposals should:

ii) make a positive contribution to the local character, shape and scale of the area;

ix) make provision for open space, amenity, leisure and play through providing, enhancing and contributing to the green infrastructure of the district;

9.2 Local Plan Policies CN01 on design and CN04 on designing out crime are also key considerations albeit the application is in outline form except for access, and these matters will be further considered under any subsequent reserved matters.

9.3 As noted above the proposals provides a significant area of open and greenspaces with public access, such that the gross density is only 14dph, although net density is 40dph. The below table from Public Realm confirms that the level provided is in well excess of the requirements for a development of this size.

Open Space Standards			
Green open space	Required Standards for 1,000 pop (Ha)	Required for 750 units (1800 pop) Ha	Provided for 750 units (1800 pop) Ha
Parks and public gardens	1	1.8	2.1
Amenity greenspace & Natural greenspace	1	1.8	21.52
Provision for children and young people	0.1	0.18	0.2
Proposed attenuation basins	-	-	3.45
Drainage structure approved under planning application ref. DC/21/01815	-	-	1.51
Total open space	2.4	4.32	28.78

9.4 In accordance with Core Strategy Policy CS14 a Green Infrastructure Strategy has been submitted with the application, which considers historic, ecological and topographical constraints of the site, including surface water run off. The green infrastructure on site would connect to the Wolsey Grange Phase 1 surface water drainage area, and into the Gipping Valley, with the significant areas of open space secured.

- 9.5 The proposal sets out LEAP, LAP and play on the way features, with further opportunities for recreation offered in the green corridors and open space. Walking routes and a trim trail are also proposed.
- 9.6 As such the proposal is considered to make a positive contribution, and make a significant provision for open space, amenity, leisure and play, including contributing to the green infrastructure of the district. Overall, the scheme proposes a significant amount of green infrastructure, which offers benefits in accordance with the expectations of CS14 and CS15.

10. Economy and employment

- 10.1 Here Policy CS15 states:

iii) protect or create jobs and sites to strengthen or diversify the local economy particularly through the potential for new employment in higher skilled occupations to help to reduce the level of out-commuting, and raise workforce skills and incomes;

- 10.2 The provision of up to 750 dwellings will give rise to substantial employment during the construction and occupation of the development, given the scale of development proposed. The New Anglia 'Strategic Economic Plan' acknowledges that house building is a powerful stimulus for growth and supports around 1.5 jobs directly, and 2.4 additional jobs in the wider economy for every home built. The proposal will therefore result in significant job creation and will have positive economic benefits.

11. Services and accessibility

- 11.1 Policy CS15 states:

iv) ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development;

v) retain, protect or enhance local services and facilities and rural communities;

vi) consider the aspirations and level and range of support required to address deprivation, access to services, and the wider needs of an aging population and also those of smaller rural communities;

- 11.2 The site is within reach of a variety of services and facilities with Suffolk One Sixth Form College, The Beagle Pub, Premier Inn, Holiday Inn, Chestnut Tree Farm Carvery, Aldi, Tesco, Curry's, B&M, Costa Coffee, Pizza Hut, First Strokes Swim School, Oakland Hall Day Nursery and the Milk Shed café in the surrounding area. From the nearest edge of the site to Suffolk One is 160m and 1100m to Tesco. From the furthest edge of the development Suffolk One would be approximately 1000m and Tesco approximately 1700m. A Primary School is proposed on the site.
- 11.3 The Chartered Institution of Highways and Transportation Planning for Walking document states "Across Britain about 80 per cent of journeys shorter than 1 mile are made wholly on foot". The DfT Manual for Streets sets out that walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes, up to about 800m. Furthermore, the Chartered Institute of Highways and Transportation (CIHT) guidelines for Providing Journeys on Foot sets out desirable walking distances for journeys with acceptable walking distances of between 400 and 1000m, with the preferred maximum of 1200m. The Department for Transport Local Walking and Cycling Infrastructure Plans Technical Guidance for Local Authorities sets out a core walking distance of 400m (approx. 5 minutes), with a 2km radius around this, extending the walking zone to 2.4km.

The facilities would be within 1mile (1600m) for the majority of the development proposed as noted above.

- 11.4 The site itself does not include a proposal for a shop or facilities on site beyond the primary school, however on the neighbouring Wolsey Grange site (B/15/00993) consent included 4 hectares of employment land for a range of uses including A3, A4, A5, D1, D2 and certain sui generis uses which would bring further facilities within close range of this site. Furthermore, whilst not included the application does not preclude such a proposal coming forward in due course. In light of the services available in both the immediate area, as well as within Ipswich, and the distances to these it is considered that the proposal has an appropriate level of services available.
- 11.5 SCC Highways confirm that they raise no objection to the proposal, and secure works to footpaths 11, 12, 14 and 24 through Section 106 contributions. A contribution and landing point are sought to provide a Bridge over the River Gipping, along with a yearly Travel Plan contribution and Smarter Choices contribution to support modal shift and greener choices to comply with the NPPF sustainability requirements. This delivers a package of connectivity into the public rights of way networks.

12. Ecology and Biodiversity

- 12.1 Policy CS15 states:

vii) protect and enhance biodiversity,

x) create green spaces and / or extend existing green infrastructure to provide opportunities for exercise and access to shady outdoor space within new developments, and increase the connectivity of habitats and the enhancement of biodiversity, and mitigate some of the impacts of climate change e.g. enhancement of natural cooling and reduction in the heat island effect, provision of pollution sequestration for the absorption of greenhouse gases,

- 12.2 These requirements are considered to be supported by the relevant paragraphs in the NPPF, including paras 174 and 180. These seek to minimise impacts on and provide net gains for biodiversity, to avoid, mitigate, or compensate for adverse impacts or lastly refusing harmful development, and looking for opportunities to incorporate biodiversity improvements in and around developments, especially where this can secure measurable net gains for biodiversity.
- 12.3 In assessing this application due regard has been given to the provisions of the Natural Environment and Rural Communities Act, 2006, is so far as it is applicable to the proposal and the provisions of Regulation 9(3) of the Conservation of Habitats and Species Regulations 2017 that requires all 'competent authorities' (public bodies) to have regard to the requirements of the Directive. For a Local Planning Authority to comply with regulation 9(3) it must engage with the provisions of the Habitats Directive.
- 12.4 In liaison with Place Services Ecology a Habitats Regulation Assessment (HRA) has been prepared to assess the impact of the proposal. This is because The Stour and Orwell Estuaries Special Protection Area and Ramsar site lies within Babergh District. These estuaries include extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The mud-flats hold *Enteromorpha*, *Zostera* and *Salicornia spp.* In summer, the site supports important numbers of breeding Avocet while in winter they hold major concentrations of water birds, especially geese, ducks and waders. The geese also feed, and waders roost, in surrounding areas of agricultural land outside the SPA.

- 12.5 The development site lies within the 13km Zone of Influence (Zol) identified for the Stour and Orwell Estuaries Special Protection Area and Ramsar site (within which residents of new housing are likely to regularly visit relevant designated sites for recreation). However, the proposal includes sufficient Suitable Accessible Natural Greenspace (SANG), as an avoidance measure in line with Natural England's advice. Appropriate and long-term management of this greenspace will be secured in a Landscape and Ecological Management Plan (LEMP) which will detail how the habitats and open spaces on site are to be appropriately managed for biodiversity and people. This can be secured as a condition of planning consent, with its implementation in perpetuity secured by a legal agreement. Contribution to the Suffolk Coast Recreational Avoidance Mitigation Strategy is also proposed.
- 12.6 As noted above a significant proportion of the site is to be available as public open space, including amenity space, natural, green and play space, over and above the requirements for the development site alone, and would offer recreational opportunities and biodiversity enhancements.
- 12.7 In addition to the above Natural England have considered the HRA and both the onsite and wider impacts of the proposal. Following amendments Natural England raise no objection to the proposal, subject to securing mitigation through S106 and conditions.

13. Land contamination

- 13.1 Policy CS15 states:
vii) ...ensuring any risk of contamination is identified and adequately managed, and make efficient use of greenfield land and scarce resources;
- 13.2 A Phase 1 Desktop Contamination Report supports the application. Environmental Health raise no objection to the proposed development from the perspective of land contamination subject to a condition in the instance that any unknown contamination is found. The proposal complies with criterion vii of Policy CS15 insofar as it relates to land contamination.
- 13.3 With regards to efficient use of greenfield land the proposal has a net density of 40dph, making efficient use of the land where residential development is proposed, whilst retaining a significant proportion for open space.
- 13.4 A condition is proposed for a scheme of soil management, to ensure efficient use of soil resources on site.

14. Sustainability and climate change

- 14.1 Policy CS15 states:
viii) address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy;
xiv) minimise waste (including waste water) during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development;
xv) minimise the energy demand of the site through appropriate layout and orientation (passive design) and the use of building methods, materials and construction techniques that optimise energy efficiency and are resilient to climate change (e.g. resilience to high winds and driving rain);

- 14.2 Along with the above provisions of CS15, policy CS13 on Renewable/Low Carbon Energy seeks to ensure all new development minimises dependence on fossil fuels. Development within the Strategic Allocations and Broad Location for growth and other large-scale development proposals will be required to use on-site renewable, decentralised, or low carbon energy sources with the aim of achieving a 10% reduction in the predicted carbon dioxide emissions of the development.
- 14.3 The application includes various proposals for renewable or low carbon energy, minimise waste and minimise the energy demand. Dwellings are proposed to be built to future homes standard, including ASHP, triple glazing and wastewater heat recovery. PV panels are proposed across the development, along with EV charging points. A fabric first approach is proposed to enable carbon emission reduction. These can all be secured by way of condition, along with other water energy and resource efficiency measures, and a waste management plan for the construction phase.

15. Flooding, surface water and foul water disposal

- 15.1 Policy CS15 states:

xi) minimise the exposure of people and property to the risks of all sources of flooding by taking a sequential risk-based approach to development, and where appropriate, reduce overall flood risk and incorporate measures to manage and mitigate flood risk;

xii) minimise surface water run-off and incorporate sustainable drainage systems (SUDs) where appropriate;

xiii) minimise the demand for potable water in line with, or improving on government targets, and ensure there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics;

- 15.2 Criteria xi and xii of Policy CS15 requires development to minimise the exposure of people and property to all sources of flooding and to minimise surface water run-off and incorporate sustainable drainage systems (SUDS), where appropriate. Paragraph 154 of the NPPF seeks to avoid increasing vulnerability to impacts of climate change, with development needing to demonstrate it does not increase flood risk elsewhere.
- 15.3 Suffolk County Council, as Lead Local Flood Authority (LLFA) confirm that the proposal is acceptable in this respect subject to conditions in respect of the FRA, completion of SUDS and a construction surface water management plan.
- 15.4 The EA note that there is no mention of water saving techniques planned for this development, however this is proposed be secured by way of a condition to ensure minimisation of potable water use.
- 15.5 Anglian Water do have concerns that the development will lead to an unacceptable risk of flooding downstream, for foul water drainage, not surface water, and to mitigate this Anglian Water need to work with the applicant in order to ensure that infrastructure improvements are delivered in line with the development. This is an Anglian Water infrastructure issue and a drainage strategy for the site in conjunction with Anglian Water is therefore secured by condition, to agree a phasing plan and on-site drainage strategy such that the wider infrastructure is delivered alongside development on site.

16. Air Quality

16.1 Policy CS15 states:

xvii) protect air quality and ensure the implementation of the Cross Street (Sudbury) Air Quality Action Plan is not compromised;

16.2 With regards to air quality, consultation has been undertaken with both BMSDC Environmental Health and Ipswich Borough Council, to review impacts on air quality from the development.

16.3 With regards to the comments of the Council's own Environmental Health team they note air quality within the surrounding area to be acceptable and that there is sufficient headroom to accept a large-scale development without creating issues with regards to air quality as a result. It is noted that additional air pollution as a result of the application will occur, but not sufficiently to exceed nationally set air quality objectives. Utilisation of EV charging points is noted to be essential to the scheme given that it likely will generate additional air pollution through the use of private vehicles. Attention is also drawn to the need for additional public transport options from this part of the site which are being taken forward in discussion with the developer through the Highway Authority and associated Travel Plan.

16.4 Experts acting on behalf of Ipswich Borough Council have been advising with regards to the potential wider impacts on Ipswich and have confirmed that the Air Quality Addendum addresses their concerns and have withdrawn their objection in this regard.

16.5 Policy CS15 also seeks to minimise the need to travel by car using alternative means and improving air quality, which is considered in Sections 11 and 17 of this report.

17. Accessibility and sustainable transport

17.1 Policy CS15 states:

xviii) seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars) thus improving air quality;

xvi) promote healthy living and be accessible to people of all abilities including those with mobility impairments;

xix) where appropriate to the scale of the proposal, provide a transport assessment /Travel Plan showing how car based travel to and from the site can be minimised, and proposals for the provision of infrastructure and opportunities for electric, plug-in hybrid vehicles, and car sharing schemes.

17.2 As set out above, particularly in Section 11 of this report, it can be seen that the location of the application site makes good connections to Ipswich and its facilities. Provision of additional bus infrastructure and services are to come forward to serve the site through discussion with the Highway Authority. Lastly, provision of EV charging points are to be delivered to the dwellings within the site such that while car movements might be a result of the development, it is considered that they would be made in such a fashion that it minimised impacts on air quality in line with Policy CS15.

17.3 As set out in the consultation responses, neither Highways England nor SCC Highways raise objection to the proposal. SCC Highways seek S106 contributions which will secure upgrades to local footpaths, provide a bridge over the River Gipping, a travel plan including contribution and Smarter Choices contribution, which will all support the accessibility and sustainability of the site.

18. Conclusion on CS15

18.1 In general it is considered that the application responds well to the requirements of Policy CS15. It has considered in detail the landscape impact, offering mitigation and extensive areas of open space. The open space on site and mitigation measures ensure that the proposal supports biodiversity, whilst climate change and flood risk are also addressed. Conditions to secure the proposed energy, water and resource efficiency are proposed, which again responds well to the requirements of Policy CS15.

19. Policy CS18 Mix and Types of Dwelling

19.1 Policy CS18 requires development that provides for the needs of the district's population. The mix, type and size of the housing development will be expected to reflect established needs in the Babergh district as per Policy CS15. Development on strategic housing sites or mixed use developments with a substantial residential element will be required to make provision for the accommodation needs of vulnerable or identified groups of people, as reflected in established local needs assessments.

19.2 The Planning Statement indicates that permission for the erection of 750 dwellings is sought in outline. Parameter plans submitted alongside the application set out the extent of developable area, access and movement through each area as well as maximum dwelling density and maximum building heights. No further information is provided with regards to housing mix as this would form matters to be discussed under subsequent reserved matters applications which would include details of appearance, landscaping, layout and scale. A condition is proposed to secure the agreement of the housing mix prior to or concurrent with the reserved matters.

19.3 Consultation with the Council's Strategic Housing Team notes that the development would need to provide 262 affordable dwellings on the site as well as a commuted sum to deliver affordable housing within the district. This would accord with the Council's adopted policy and would be secured via a Section 106 Agreement.

20. Impact On Residential Amenity

20.1. The application site is situated immediately adjoining only a few properties on the edges of the proposed development areas, however sufficient space on site is retained to ensure that adequate buffers are provided to these properties.

20.2 The layout of the development is a reserved matter, but it is considered that sufficient space is available on the site to provide sufficient amenity at reserved matters stage.

21. Planning Obligations / CIL

21.1. There are various requests for contributions to mitigate the impact of the development, some through Community Infrastructure Levy, some via S106, as set out below:

CIL:

Through Community Infrastructure Levy the following infrastructure can be secured:

NHS

Secondary expansion

Sixth form expansion

Libraries improvements
Waste infrastructure

S106:

By way of a Section 106 Agreement it is proposed to secure the following:

Affordable housing

This is proposed to secure 262 dwellings on site, and a commuted sum for the remaining 0.5.
This is 35% provision and compliant with policy.

Primary education new school	£4,006,416
Early Years provision	£2,362,437
Special Educational Need and Disabilities Provision	£392,490
Land for the school/early years	£1

Highways including Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy measures:

Sustainable travel improvements on the A1214 London Road corridor £375,000

Smarter choice contribution for modal shift £347,500

Speed limit extension on Hadleigh Road £11,500

Traffic calming on Hadleigh Road £40,000

PROW improvements £375,000

Travel plan £1,000 per annum from occupation 100 dwellings until 5 years after occupation of final dwelling

Bus service improvements £500,000

- 21.2 Whilst initially Ipswich Borough Council (IBC) requested contributions from the proposal towards semi-natural and natural green space, children's play space, outdoor sports provision and towards a new entrance to the park, it has subsequently been agreed that, as the site provides for its own infrastructure provision and open space requirements well in excess of BDC requirements that it is not necessary to contribute towards this provision within IBC. A contribution towards dog waste bins and composting toilets is proposed to ensure that any minor impact on Chantry Park is appropriately mitigated.

IBC Chantry Park contribution to compost toilets £20,000 and to 3x dog waste bins £1,950

- 21.3 On site open space provision and management and maintenance of the space to be agreed (including commuted sum if transferred to BDC) and requirement for public access as outlined in the Habitats Regulation Assessment.
- 21.3 As per the requirement of SWT it is proposed that the Northern Open Space is created prior to first occupation.
- 21.4 LEMP – As per Ecology recommendation to secure delivery of effective and deliverable management for biodiversity and people in perpetuity
- 21.5 Financial contribution in line with Suffolk Coast RAMS to deliver visitor management measures for the Habitats sites on commencement.

22. Parish Council Comments

22.1 Sproughton

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

Sproughton Neighbourhood Plan Design Code

This application is in outline, and details would be agreed under a reserved matters application, with due consideration to the design code. With regards to the potential three storey detail, this is an overall indication of areas in which three storey properties may be acceptable, however the detail of this would have to be assessed within any future reserved matters proposal.

With regards to mix of houses, and bungalows the mix and type are secured by condition to be agreed concurrent with the reserved matters application(s).

22.2 Pinewood

Pinewood Parish Council were also consulted and raised concerns, the majority of which are considered above. With regards to the cumulative effect, this has been considered in the assessment of the application, including through an Environmental Assessment.

22.3 Ipswich Borough Council

Ipswich Borough Council were consulted on the application as noted above and initially raised objections on various points, however following on-going officer discussions these points have been addressed and agreement has been reached to resolve these points, and therefore to seek contributions and conditions accordingly.

PART FOUR – CONCLUSION

23. Planning Balance and Conclusion

- 23.1 The starting point for decision-taking purposes remains the development plan with the National Planning Policy Framework a material consideration in this decision. The policies of the Core Strategy generally conform with the aims of the Framework to promote sustainable transport through walking, cycling and public transport by actively managing patterns of growth in support of this, whereby significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This includes significant contributions to the implementation of the Ipswich Strategic Planning Area (ISPA) Transport Mitigation Strategy.
- 23.2 The Framework objectives for sustainable development include delivering a sufficient supply of homes. The Council benefits from a five-year housing land supply. The tilted balance at paragraph 11(d) of the NPPF is not engaged by reason of any shortfall in housing supply or delivery.
- 23.3 Nevertheless, meeting the requirements of paragraph 73 is not intended as a ceiling on further housing, where the Framework continues to support Government's objective to significantly boost the supply of homes under paragraph 59 of the NPPF. The location is considered to be a sustainable location with some services provided within the immediate surroundings and good connections to Ipswich reducing the need to travel by private car. The benefits resulting from the delivery of 750 houses is considerable and as noted above the deliverability of this site includes longer term delivery through to 2036.

- 23.4 Consideration is then given to the compliance of policies with the NPPF, and whether the tilted balance thus engages.
- 23.5 The site is within the Babergh Ipswich Fringe, identified in policy CS2 as a sequentially preferable area for new development. The acceptability of the proposed development needs to be assessed having regard to its benefits and adverse effects, but as a matter of principle it is in an area identified in the Core Strategy with potential for future growth.
- 23.6 Policy CS2 carries reduced weight because of the age of the settlement boundaries and absence of allocations document and its partial inconsistency with the NPPF, although the overall settlement pattern strategy remains sustainable. Bearing in mind the location of the site in the Babergh Ipswich Fringe policy area, the underlying aims of policy CS2 are broadly met, the proposal accords with the general development strategy in CS2. Policies CS1 and CS15 can be given full weight given their strong alignment with the NPPF in terms of this proposal. Therefore, for the purposes of paragraph 11(d) the policies most important for determining the application as a whole are considered to be up-to-date. Whilst CS2 carries some reduced weight, the basket of the most important policies is not considered to be out-of-date and paragraph 11(d) of the NPPF is not engaged.
- 23.7 Having regards to the requirements of Policy CS15 there are a notable number of benefits from the proposed development
- Extensive areas of publicly accessible green space (comprising over 50% of the Site's area)
 - 35% affordable housing provision
 - Provision of housing, including economic benefits through construction and occupation
 - 2FE Primary School (with additional area reserved for future expansion)
 - Trim trail equipment/children's play areas
 - Biodiversity enhancement area, with 18.81% biodiversity net gain
 - Financial contribution towards a bridge across the River Gipping and provision of landing point
 - Dwellings built to future Homes Standards (ASHp, triple glazing, wastewater heat recovery, underfloor heating)
 - PV Panels across the development
 - A fabric first approach to carbon emission reduction
 - Highway Improvements (which go beyond mitigation and include ISPA Transport Mitigation Strategy measures):
 - Offsite highway improvement full details for A1071/B1113/Swan Hill, A1071 junction, A1214 junction
 - Full details of Hadleigh Road roundabout access and footway, Hadleigh Road central access and footway, Hadleigh Road Northern access and footway.
 - Visibility splays for Hadleigh Road Northern and Central access
 - Cross valley cycleway/footway
 - Hadleigh Road toucan crossing
 - Cycleway/footway route and bus stop improvements close to A1071
 - Provision of electric vehicle charging points
 - Travel plan
 - Bus stop provision and improvements plan
 - Improvements to Footpath 14 agreed and implemented
 - Sustainable travel improvements on the A1214 London Road corridor
 - Smarter choice contribution for modal shift
 - Speed limit extension on Hadleigh Road
 - Traffic calming on Hadleigh Road
 - Upgrade Sroughton Public Footpath 14 from footpath to bridleway status

Upgrade Sproughton Public Footpath 24 from footpath to bridleway status
Improve Sproughton Public Footpath 24 to and through underpass to make route more accessible
Improve Sproughton Public Footpaths 11 and 12 onto Church Lane
Improve access along Sproughton Public Footpath 11
Bus service improvements

- 23.8 The delivery of this quantum of housing, a policy compliant level of affordable housing, and an extensive area of public open space are significant benefits. Whilst the extent of development goes beyond the local need of Sproughton Parish, the delivery of housing in the district remains an important consideration. Therefore, while the Council can presently demonstrate a five-year land supply, the provision of these houses is still a weighty consideration, further noting the delivery through to 2036, supporting future growth and need.
- 23.9 Those other matters which weigh against the application must also be considered. These include:
- Potential loss of Best and Most Versatile Agricultural land (grade 3 and 3a).
 - Moderate to adverse landscape and visual effects, although reducing over time as landscaping matures.
 - Medium to high level of less than substantial harm to heritage assets.
- 23.10 The proposal has the potential to harm the setting of the neighbouring listed buildings and parkland, in turn causing a medium to high level of less than substantial harm to the significance of these heritage assets. This potential harm to the significance of designated heritage assets is a disbenefit of the scheme which should be weighed against the public benefits. In that balancing exercise, considerable importance and weight is to be given to the harm in light of the statutory duty imposed by the Listed Buildings Act 1990.
- 23.11. Noting the weight to be attached to harm to heritage assets, the proposal's contribution towards the Council's housing targets, provision of affordable housing, primary school, open spaces, highway improvements and biodiversity net gain, are considered to outweigh the medium to high level of less than substantial harm to the significance of the affected heritage assets.
- 23.12 As identified above, the development would result in an impact on the landscape character and to visual receptors to the site. However, the landscape harms identified would reduce with mitigatory planting in the longer term. Whilst the proposal will have an urbanising effect, the development will not appear isolated in a landscape sense (and paragraph 80 of the NPPF is not engaged). The development scale will not overwhelm the site, or its surroundings given the open space retained, and sufficient provision can be made for required infrastructure.
- 23.13 The proposal for 750 new homes would add to the local housing stock and offer meaningful support for the local services, both during construction and following occupation of the development. Consequently, the proposal would have social and economic benefits that, given the scale of development proposed, would be significant. These benefits are afforded more than moderate weight given the level of contribution towards the aim of achieving sustainable development. They weigh clearly in favour of the scheme.
- 23.14 The proposal is considered to be acceptable in respect of highways, with Highways England and SCC Highways having resolved their initial concerns. The proposal secures works to the highway network, including footpath improvements, upgrades from footpath to bridleway, a bridge over the Ripping Gipping, travel plan and bus service improvements. Overall a comprehensive package which offers benefits can be secured, and accordingly the proposal offers sustainable travel and highway improvements which comply with the requirements of CS15 and weigh in favour of the scheme.

- 23.15 Residential amenity of neighbours is safeguarded to an acceptable level and a high standard of amenity can be secured for future occupants of the development. Finally, the development would enable a net gain for biodiversity greater than 10% compared to the existing value of the site for protected species. These are scheme positives.
- 23.16 Therefore, it is considered the above merits of the scheme and compliance with policy CS15, including the accessible location of the housing and its contribution to boosting housing supply at a strategic scale, delivering appropriate infrastructure and enabling cohesive place making, when balanced against the identified heritage harm, limited harm to the wider landscape and loss of agricultural land, would represent sustainable development and when considered as a whole would meet the requirements of policy CS15 and all other relevant local plan policies outlined above. Matters relating to landscape and heritage harm have been considered, but for the reasons identified in the above report the benefits outweigh the harm identified and are considered to be significant and compelling in the overall planning balance.
- 23.17 The proposal is considered to represent a sustainably located site for new residential development and would provide the opportunity to deliver well designed, sustainable development with tangible benefits in relation to public open space, furthering the overarching thrust of policies CS1 and CS15 of the Core Strategy and providing for net gains to the three objectives of sustainability in accordance with the NPPF (which notwithstanding the development plan is a compelling material consideration). The application is therefore recommended for approval because, the proposal accords with the general development strategy in CS2, offers benefits in accordance with CS1 and CS15 and accords with the development plans as a whole. Other material considerations further indicate that permission should be granted despite the limited harms identified.

RECOMMENDATION

That authority be delegated to the Chief Planning Officer to Grant outline planning permission:

(1) Subject to the prior agreement of a Section 106 Planning Obligation on appropriate terms to the satisfaction of the Chief Planning Officer as summarised below and those as may be deemed necessary by the Chief Planning Officer to secure:

- Affordable housing on site 262 and commuted sum for remaining 0.5
- Sustainable travel improvements on the A1214 London Road corridor £375,000
- Smarter choice contribution for modal shift £347,500
- Speed limit extension on Hadleigh Road £11,500
- Traffic calming on Hadleigh Road £40,000
- PROW improvements £375,000
- Travel plan £1,000 per annum from occupation 100 dwellings until 5 years after occupation of final dwelling
- Bus service improvements £500,000

- On site open space provision and management and maintenance of the space to be agreed (including commuted sum if transferred to BDC) and requirement for public access as outlined in the Habitats Regulation Assessment. As per the requirement of SWT it is proposed that the Northern Open Space is created prior to first occupation.
- LEMP
- Financial contribution in line with Suffolk Coast RAMS
- Primary school new build £4,006,416
- SEND new build £392,490
- Early Years £2,362,437
- Freehold fully serviced site 3ha for new primary school/early years £1
- IBC Chantry Park contribution to compost toilets £20,000
- IBC Chantry Park contribution to 3x dog waste bins £1,950
- Monitoring fees

(2) That the Chief Planning Officer be authorised to GRANT Planning Permission upon completion of the legal agreement subject to conditions as summarised below and those as may be deemed necessary by the Chief Planning Officer:

- a) Standard time limit
- b) Reserved matters
- c) Approved Plans
- d) Phasing Condition including with Chantry WRC
- e) Swift boxes/bricks installation scheme to be agreed
- f) Hedgehog fencing scheme to be agreed
- g) Housing mix prior to or concurrent with reserved matters to be agreed
- h) Energy, water and resource efficiency scheme to be agreed, including PV panels and EV charging points, ASHP, fabric first approach and future homes standard
- i) Construction Management Plan including working hours to be agreed
- j) Construction surface water management plan
- k) FRA
- l) SUDS Completion confirmation and inspection
- m) Anglian Water on-site drainage strategy.
- n) Waste minimisation and recycling strategy
- o) Unexpected ground conditions
- p) Landscape Ecological Management Plan
- q) Landscape Management Plan
- r) Landscaping Scheme
- s) Boundary treatment to Chantry Park

- t) Accordance with Ecological report and recommendations
- u) Environmental Management Plan for Biodiversity
- v) Biodiversity net gain design stage report
- w) Further surveys for protected species
- x) Wildlife sensitive lighting design scheme
- y) Fire Hydrants
- z) Arboricultural Method Statement
- aa) Tree protection plan
- bb) Archaeological investigation and reporting
- cc) Environmental Management Plan
- dd) Soil management plan
- ee) Waste management plan
- ff) Construction method statement to be agreed
- gg) No burning
- hh) Acoustic barrier details agreed and implementation
- ii) Noise report and mitigation prior to reserved matters
- jj) Acoustic Design Statement prior to reserved matters for school
- kk) Levels
- ll) Remove permitted development rights
- mm) Offsite highway improvement full details for A1071/B1113/Swan Hill, A1071 junction, A1214 junction
- nn) Full details of Hadleigh Road roundabout access and footway, Hadleigh Road central access and footway, Hadleigh Road Northern access and footway.
- oo) Visibility splays for Hadleigh Road Northern and Central access
- pp) Cross valley cycleway/footway to be agreed
- qq) Hadleigh Road toucan crossing to be agreed
- rr) Cycleway/footway route and bus stop improvements close to A1071 to be agreed
- ss) Estate roads and footpaths implementation
- tt) Means to prevent discharge of surface water drainage onto the highway
- uu) Estate road phasing and completion plan to be agreed
- vv) Carriageways and footways constructed prior to occupation
- ww) Details of the areas to be provided for the loading, unloading, manoeuvring and parking of vehicles, including secure cycle parking to be agreed
- xx) Provision of electric vehicle charging points
- yy) Details of landscaping that may impact upon the highway
- zz) Travel plan
- aaa) Bus stop provision and improvements plan
- bbb) Improvements to Footpath 14 agreed and implemented

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

- Proactive working statement
- SCC Highways notes
- SCC Flood and Water Management notes
- Support for sustainable development principles

(4) That in the event of the Planning obligations or requirements referred to in Resolution (1) above not being secured and/or not secured within 6 months that the Chief Planning Officer be authorised to refuse the application on appropriate ground(s)