

As this application was the largest application to come forward in the parish SPC employed 'Impact Planning Services' and 'Landscape Planning & Landscape Architecture Services' to assist us in drafting our detailed response to Babergh Planning – those reports should have been read in conjunction with our response. Our original response was made Aug'21. However, given the passage of time and the many additional documents uploaded since that time we submitted an updated response to reflect the contents of those additional documents in Nov'22. This document contains a summary of our previous objections and comments on the Planning Officers 130 page '**Public Document Pack**' submitted to the Babergh Planning Committee.

**Sproughton PC OBJECT to this application and feel strongly that this particular planning application should not be considered at this time due to the delay of the emerging BMSDC JLP partly due to the associated work on the spatial strategy and site allocation/assessment required. This site has been put forward in the new plan but does not exist in the current local plan. This site should be evaluated in accordance with the current valid local plan as per the guidance from the planning inspectors overseeing the BMSDC emerging JLP.**

**To summarise our earlier objection letters:-**

1. **Housing Need under the current 2011-2031 BDC Local Plan 2.1.** The present 2011 – 2031 Local Plan/Core Strategy allocated the site of the current Wolsey Grange development B/15/00993 under Policy CS7. Identified as the Ipswich Fringe Strategic Development Site this was a mixed-use allocation to provide an identified need for 350 additional homes in the Ipswich fringe area to assist with the housing needs of IBC over the plan period up till 2031 (under the 'Duty to Cooperate' rule). This does not take into account additional applications in the Ipswich Fringe which will now take the Ipswich Fringe housing provision well beyond the year 2038 based on the BDC Local Plan identified need. We therefore fail to see any justification for even more housing provision in the parish within the new JLP period, as the identified need within the JLP period appears to have already been met.
2. **Unacceptable & significant threat of Creeping Coalescence to Sproughton.** Sproughton is under increasing threat of merging with neighbouring communities (Bramford, Ipswich. Burstall). As the LPA, BMSDC has a duty under the NPPF to prevent creeping coalescence.
3. **Inadequate consideration regarding cumulative impact on local infrastructure in the area.** Current NHS medical and dental services are overwhelmed and cannot cope with current demand as it is. Monetary contributions are only part of the issue as recruitment is difficult, retention is even harder.
4. **There should have been a Master Plan covering the entire area proposed for Wolsey Grange 1 and Wolsey Grange 2** up to the Sproughton Enterprise Park (SEP). This is one large development of 1,225 homes (a tripling of the size of the parish).
5. **Lack of clarity of proposed building sizes & mix.** The Sproughton Neighbourhood Plan specifies a **maximum of 2 storeys** for buildings in the parish as stated in the AECOM Design Codes document. Having reviewed the actual heights of the more modern two storey homes in the parish an average slab to ridge height of 8m is normal and we consider this appropriate **NOT** the 9.5m specified in the document submitted by Taylor Wimpey '210317WG2\_Parameter Plan – Maximum Building Heights Plan'. This 9.5m height feels as though it is actively allowing for extension into the roof space thereby creating a 2.5 storey building out of a supposed 2 storey building. The homes, if built to those heights, will appear much more dominant in the landscape. There is no information on building mix – how many bungalows will be built??
6. **There is inadequate provision of community facilities in the application.** There is no community provision in this development. There are no community halls, social club facilities or sports provisions beyond children's play areas & fitness trails which are of little benefit in winter, at night or in bad weather. The Education Authority is under no obligation to let residents use/continue to use the primary school's facilities.
7. **The present application would have an unacceptably high adverse impact on the Landscape Value and Heritage assets in Chantry Vale** due to planned 3 storey buildings on valley sides having a larger than normal impact due to being built on sloping ground looming over the historic listed building – Red House Farm ruining its setting in the landscape.
8. **No consideration of Sproughton Neighbourhood Plan.** Our AECOM Design Codes document should be respected by the developer. 3 & 2.5 storey homes are not in accordance with this. The proposal to encircle the valley with a ring of dominant white/light rendered properties on its frontage facing into Red House Farm & the valley is unacceptable & visually damaging to the character of the Parish, landscape and Heritage Assets.

9. **Poses threat to three important local Wildlife Areas.** The application proposes net biodiversity gains in the form of wildflower areas & other unspecified planting in areas that are already green. The priority should be the protection of three wildlife areas. Chantry Vale sits beside the County Wildlife site in Chantry Park. The Chantry Cut Island Nature Site & river valley (SEP Site) acts as a wildlife route into & supporting a third site - the County Wildlife Site on the River Gipping from the railway line bridge at Boss Hall to Yarmouth Road. These sites support an abundance of diverse/protected species. The Sproughton Enterprise Park site is scheduled for designation as a Local Nature Reserve as part of the agreed SEP Landscape & Ecological Management Plan. These wildlife sites must maintain a healthy connection with the wider countryside via wildlife corridors.
10. **Level of Affordable Housing.** Our experience with TW Phase 1 is underwhelming. Firstly, the housing allocation was increased from 350 to 475 for TW to make it viable to build 35% affordable homes. Currently the percentage of affordable homes in TW1 stand at approx. 22%. We have little confidence that the supposed mandatory 35% affordable homes will be realised in TW2.
11. **Inadequately defined Primary School Provision.** Currently children from TW1 will be going to school in Pinewood, Sproughton & further afield. The schools are bursting at the seams. The Primary School needs to be one of the first things built on TW2 to satisfy demand and provide facilities within walking distance.
12. **Drainage strategy presenting unacceptable risk to listed Grade II Heritage Asset.** We have noticed increased flooding in this area in the past year and with the increasingly volatile weather feel this represents an increased risk to this heritage asset.
13. **Impractical & awkward Emergency Route placement:** A proposed new emergency route is shown at end of Church Lane by the A14 underpass. Emergency vehicles cannot get through the underpass. Ambulances would need to traverse the whole length of Church Lane from the Hadleigh Road to end. It would be more sensible to use the proposed entrance to the housing estate off the Hadleigh Road. The proposed placement looks as though it is a 'starter for 10' for a new road into the development possibly with enhancement of the underpass to enable it to make it passable for vehicles.
14. **Traffic.** We commented on specific issues in our original objection however we are also very disappointed with the impacts of the traffic enhancements so far. All the additional traffic light appear to have done is increased the time taken to get through the complex encouraging drivers to divert into Hadleigh Road or through the already congested village. We can only assume that once the traffic lights into the commercial area of Wolsey Grange become active this will get even worse.

[Having reviewed the planning officers report to Babergh Planning Committee in preparation for the Wed 25Jan23 meeting we have some additional points as we feel that some areas lack the depth required to reflect our concerns and present a complete picture.](#)

#### **P16 PART TWO POLICIES AND CONSULTATION SUMMARY**

Although we agree any policy document has limited weight until adopted, the Sproughton Neighbourhood Plan & all its associated reports have been approved by SPC and has been accepted by BMSDC (04Nov22). It is now at Reg.16 consultation phase prior to independent examination. After any amendments recommended by the examiner it will go to referendum. It is nearer to completion than the JLP and should carry more weight than most emerging NP's as it is potentially now in its final form.

We question why the Sproughton PC's Responses have been summarised so briefly omitting any reference to the evidence supporting our responses and in particular omitting to include the consultant reports we submitted or any evidence from them:-

- (a) The Planning Report by Impact Planning Services
- (b) The Landscape report by Lucy Batchelor-Wylam Landscape Consultant who assisted in the Sensitivity & Capacity assessment Ipswich Fringes report commissioned by Ipswich Borough & the Fringe District Councils
- (c) Details from the adopted Landscape Character Type Reports Guidance notes
- (d) Exerts from the LUC Heritage Impact Assessments for Preferred Sites which is a document adopted by BMSDC as part of the JLP.
- (e) Also, significant reports and evidence included in the submission by the owner's of Red House Farm on 24th June. Due to the impact this application will have on Red House the owner's are potentially the most

important objectors to this application and yet their detailed and very informative response is neither mentioned or referenced, nor are the reports they submitted with their response. These are:-

- a. A Planning Consultation by Ben Elvin
- b. A full Copy of the refusal of the Planning Application in 1986.
- c. Landscape Appraisal by Alison Farmer Landscape Consultant who completed the Sensitivity and Capacity assessment Ipswich Fringes report for the combined Ipswich Borough and Fringe District Councils
- d. The Heritage Impact Assessment by Michael Collins
- e. The Review of the Catchment Hydrology and other Drainage Related Matters report by JPC Environmental Services

These are detailed & important documents. Clearly it would be impossible for the parish council to summarise all the important points raised in all these unreferenced reports in our 3-minute verbal presentation.

**P17 A: Summary of Consultations – Sproughton PC:** SPC felt the summary to be so brief as to not adequately reflect our concerns. With regard to SPC's updated submission of 01Dec22 & the need for a full Master Plan. This comes partly from the Impact Planning Services report we submitted but also from the BDC Local Plan 2011-2031 core strategy examination by the planning inspector Government Inspector Mr Phillip JG Ware who considered the implications of development across the whole of Chantry Vale, the CS7 strategic Development site and references to the Core Strategy. This Committee report provides no validation of the evidence or argument behind this brief 'Need for a full Master Plan' summary of our response.

The inspector stated that development of Chantry Vale would need a Master Plan covering the whole area. But because only the CS7 Site was necessary for the period of the Core Strategy period, and therefore was not considered an appropriate sequential development, it would be unfair to encumber a developer of just the CS7 site with a Master Plan for the whole area. This has been undermined by deliberately excluding any consideration of the wider site in the CS7 site application even though there were clear indications that before the WG1 application was approved development of the wider site was already under consideration by referencing it in the approved WG Masterplan document, Jul'15, P9.

It follows therefore that the recommendations for a Master Plan for the whole area should have been completed and since it was not done then it should be done now as a Master Plan for the whole area as the Inspector considered was necessary if development of the area is to happen within the Core Strategy Period. It also follows since the inspector considered that development of the whole site required a Master Plan for the whole site prior to development that a new Master Plan all adverse impacts would have been considered cumulatively. It further follows that since this WG2 application is bigger and on a more sensitive area than the WG1 (CS7) site then had the Core Strategy proposed to develop the whole site the Inspector would have expected, at the very least, a planning policy as rigorous as those applied to the smaller less sensitive CS7 site.

With regards to the extent and evidence of our comments regarding the impact on Special Landscape Area and the defined Landscape Character types the evidence of both Alison Palmer and Lucy Batchelor-Wylam and our references to the guidance from the adopted Landscape Character Type reports are barely touched on. For instance there is no mention of the adverse impact on the valley landscape of the line of white/pastel walled homes proposed as a ring around the front of the development in the valley. Nor of Alison Farmers argument and evidence why the development should stop at the break of the plateau at the 35m contour line, of those parts of the valley she identifies as 'Valued Landscape' and the implications of that, of the several points of conflict with the Landscape Character Type guidance and in particular the adverse visual impact an estate 'Roofscape' up the valley sides will have on the valley. This is especially so as the housing density of this estate would preclude the sort of tree planting that might otherwise be required within the estate to screen and mitigate the 'Roofscape' from the valley.

The impact on Heritage impacts is covered to some extent later in the Planning Officers advice. However not the most relevant evidence. Although this Committee Report covers some reference to the LUC report some of our strongest evidence, abstracted plans showing the areas and levels of adverse harm for both this site and the Hopkins Homes site in Sproughton (which have an almost identical level of harm) have not been included. Since the Hopkins Homes application next to (the listed) Sproughton Hall was rejected twice by the planning committee

& an appeal was also rejected by the Planning Inspectors considering this very evidence. This is information that the planning committee should be made aware of.

We are trying to keep this response brief but that is very difficult with so many of our other issues raised played down with no reference to the evidence we have provided. One of which is 'Important Wildlife Area'. The brief summation encompasses the four designated wildlife areas that we touched on in the 'Interchange 55' commercial estate application why the connections to each other and the wider countryside needed to be retained. Aggressive development of this area will stifle and stress all the few wildlife corridors remaining to the wider countryside. None of this has been considered in this application which focuses on resident biodiversity on the site. We feel that the primary biodiversity value of this site is as a wildlife corridor providing transitory movement between habitat areas typically between the designated local wildlife sites and the wider countryside. Policy CS15 (x) requires: *...and increase the connectivity of habitats and the enhancement of biodiversity*.. Therefore, the biodiversity gain, or loss, should be a measure of not just the impact on the resident biodiversity on the site but also on the impact on transitory biodiversity between the identified habitat areas (locally designated wildlife areas and the wider countryside) and the biodiversity gain or loss that may result in those habitat areas as a consequence of this application. Likewise Green infrastructure, landscaping, and biodiversity management proposals should reflect a net gain not just of resident biodiversity on the site but a net gain in the adjacent wildlife areas and their connectivity.

We do not consider this committee report's single reference to our concerns as 'Important Wildlife Area' adequately relays this.

**P17: SPC response 16/08/2021:** Here we submitted the reports from Lucy Batchelor-Wylam Landscape Consultant and Impact Planning Services which, like the reports from Red House, have not been included or even summarised. The Summary of the points we initially raised is again brief and vague. A few of the points have been addressed by the applicant. In relation to flooding. We are still particularly concerned about the flooding risk to Red House and feel both the planning officer and committee should be aware that Hadleigh Road has recently flooded twice outside Red House in the last couple of months despite efforts to clear the drains and watercourses. We know that on at least one of those occasions there was flooding to the buildings at Red House. Consequently we have little faith in a theoretical drainage system that will direct even more of the water down this route despite the assurances of the applicant and the acceptance of the water/flood authorities.

**Planning History:** The advice that this application is different to the 1986 application is misleading. Only if you consider this application in isolation of the total development occurring during the period of this Core Strategy is it slightly smaller.



The Planning Inspector in the examination of the Core Strategy stated that it was unreasonable to expect a developer of only the CS7 site to produce a Master Plan for the whole area because development of the whole area was not required within the Core Strategy period but that a Master Plan for the whole area was necessary if it was to be developed. Therefore, it is entirely appropriate to consider the total development if the whole area is to be developed.

Paragraph 2.8.3.9 of the Core Strategy supports this and states that a piecemeal approach to the development of this area would be unacceptable.

In fact the total area of the WG1 and WG2 site is greater than the 1986 application and this can be seen from the attached Master Plan drawing for development at that time that does not extend south of Poplar Lane.

However, absence of development of the land to the north of the site due to restrictions of floodplain etc. is now further restricted by covenants around Red House that were not in force in 1986.



We do not believe that this Committee Report’s assessment of the relevance of the rejection of that appeal is balanced. The rejection was based on the balance of public benefit against the harm. The harm was less accurately quantified 35 years ago and this was a public benefit that included 1,600 homes, a retail area (including a community hall, medical centre and public house), a school, a country park and road improvements. The present application is for less homes, with negligible community facilities and the heritage/ landscape harm is far better quantified. This would seem to indicate an even stronger case for rejection now.

**P20 NHS 15/06/2021:** This paragraph only covers part of the issue with respect to the provision of healthcare. There are actually two NHS surgeries in close proximity to the proposed site. However, reference is only made to one – Hawthorn Drive. Hawthorn Drive is actually further away from this site than Pinewood Surgery if distances are measured from the approximate centre of this site or from the closest part of the site to the surgery. However, Pinewood Surgery is not mentioned.

Pinewood – from centre of site	Pinewood – from nearest point of site
Hawthorn Drive – from centre of site	Hawthorn Drive – from nearest point of site

It should be noted that Hawthorn Drive Surgery do not own their site – they simply lease the building. Therefore, it is by no means certain that the owner may want to sell the site or extend/ replace the existing surgery. The surgery is oversubscribed by several thousand patients for the number of GPs & in a deprived area. There is a portacabin in the carpark as they have run out of space inside.

Pinewood surgery has already been extended and there is little further scope for expansion. There is so little space that the conference room has been repurposed to accommodate clinical & non-clinical staff. In 2019 there were 5 partners, as of Jan’23 there are 2. The surgery spends upwards of £25,000 per month on locums as they are unable to recruit additional permanent doctors.

The CCG state they want a monetary contribution towards the provision of basic healthcare services. However, this will not solve the problems highlighted above – it will not solve the issues with the physical buildings nor will

it magic up doctors from somewhere. **THIS DEVELOPMENT CANNOT BE SUPPORTED FROM THE HEALTHCARE PERSPECTIVE.**

**P21 Suffolk Preservation Society 22/06/2021:** It is notable that the SPS have objected to the application in its current form & believe that the Planning Officer has underestimated the level of harm – SPS state ‘medium to high levels of less than substantial heritage harm’. We must protect our heritage assets and their setting – they are part of what makes Babergh as a whole a great place to live. Development should be carefully considered and appropriately mitigated to avoid the concreting of the countryside and the creation of a giant concrete conurbation that absorbs the fringe villages and moves on further towards surrounding towns. TO meet SPS’s concerns regarding Red House Farm it would be sensible to severely restrict the number of homes in that area (between Hadleigh Road & the A14) to protect the view of Red House Farm when approached from either direction.

**P24 Woodland Trust 8/08/2022:** We concur with the Woodland Trusts comments and believe their comments regarding additional buffering around significant trees to be relevant. Taylor Wimpey do not have a good history with respect to significant planting - witness Sproughton PCs need to involve lawyers to try to get the ancient hedgerow along Poplar Lane reinstated.

### **P38: PART 3. ASSESSMENT OF APPLICATION**

**P41: Para 3.9:** It is argued that prematurity is not to be considered as a factor. We feel that the Core Strategy has been ignored in that statement, possibly because the statement is made in a section considering the emerging JLP. However, it is premature in that the Core Strategy & the Inspectors findings for it discounted development of this area within the period of the Core Strategy. **This is supported in Policy CS3.**

**P42: Para 3.13/3.14:** There seems to be some suggestion that the Sproughton NP settlement boundary is not reliably defined due to the changes made during its construction. This is misleading.

The original settlement boundaries were dictated by the emerging JLP because it was expected that the JLP would be adopted before its completion. No Neighbourhood Plan (NP) submitted to the LPA with settlement boundaries in conflict with the adopted JLP would be approved. The NP Committee therefore had no option but to adopt the settlement boundaries proposed in the JLP which included development areas we non the less objected to. These included the Hopkins Homes & Pigeon sites to the North of Sproughton, applications which now have been refused.

Consequently, the withdrawal of the JLP including the re-evaluation of the Spatial Strategy and proposed development sites allows the NP Committee to set the settlement boundaries as they feel appropriate, guided by their community research, provided they now conform with the Core Strategy.

So the change has been dictated by the changes in BMSDC ‘s position not SPCs. This obviously includes removal of the rejected Hopkins Homes and Pigeon sites, and as we do not consider this development of the Chantry Vale appropriate this development site also as it was not included in the Core Strategy.

**P44: Para 3.16:** Typically, NP’s take years to complete and we are now down to the last few months of the process. So, although not adopted it is very well advanced. So, with the possibly only of minor amendments after its official review by the planning inspector we are hoping it will be ready to be submitted for referendum very soon potentially years in advance of the JLP.

**P44: Section 4 Assessment against CS11 and CS7 of Core Strategy:** We disagree with the assumptions drawn about the relevance of CS11 from Para 2.1.4.1 of the Core Strategy. This relates to the *built-up areas on the urban edge of Ipswich*. This site is not built up. The built-up areas of the Parish that are on the Urban Edge of Ipswich are clearly defined by the settlement boundaries. This did not include the WG1 site but since it is now built up that site becomes a *built-up area on the urban edge of Ipswich*.

Similarly, we disagree with the assumptions drawn from Para 2.8.3.2 as again the defining definition is *the built-up areas on the edge of Ipswich*. Although the Paragraph defines the village as being to the west of the A14 it does not define all land to the east of the A14 as urban, only the currently built-up areas.

In the absence of such a policy definition we find it difficult to see how any common sense or practical definition of this valley as being an *urban built-up area* could be drawn when viewing the valley with sunken lanes and rolling valley farmlands surrounding the significant historic listed farmhouse.

**P45: Paras 4.4, 4.5, 4.6 and 4.7:** We disagree with the arguments in the conclusion of the Committee Report derived from lengthy interpretations of policy CS2. We would say that the simple logical application of policy CS2 is what it looks and feels like, which is an application for development on sensitive countryside. However, as Planning is dependent on Policy & the way the policy is applied we will pick the bones out of the interpretations and show that the Committee Report conclusion must be wrong.

One suggestion is that because the site sits between the development sites of CS7 and CS8 which are described as in the Ipswich Fringe area that the Chantry Vale is therefore a developable area within the Ipswich Fringe. We would point out that when the Core Strategy was adopted Chantry Vale was predominantly an area surrounded by undeveloped farm land. To the east, Chantry Park Wildlife Site & the wide screened corridor of London Road. To the North, the River Gipping. To the West in a recessed cut, the A14 with only countryside visible beyond and to the South predominantly farmland (now WG1/CS7). We would suggest that the CS8 & CS7 allocations defined the limits of acceptable development in the area, certainly within this Core Strategy period, which is why CS7 housing terminates at the edge of this site. Core Strategy Para 2.8.3.7 which is quoted appears to confirm that and also that any consideration of this site was not sequentially preferable. Core Strategy Para 2.8.3.9 also quoted similarly, rather than supporting the suitability of this site for development provides evidence of this site's unsuitability at this time, being premature, unacceptably piecemeal and only considers, as a future possibility that might provide greenspace *with 'some development' of the urban edge*. We do not think 750 homes represents *'some development'* it is a major housing estate, and we do not consider that the development along the ridge West of Red House Farm is urban edge. On its own, this part of the site represents a housing estate in itself isolated on a ridge of the valley.

Neither do we consider development along the southern edge is urban edge within the context and time frame of the Core Strategy because, despite the presence of the TW1 development now, that edge was farmland when the Core Strategy considerations for the extent of development were made. Considering it otherwise now is just undermining the Planning Inspectors examination.

There is reference here to the definition of the term 'Urban Fringe' which is confusing as it is only used three times in the Core Strategy and not specifically in relation to the policies being considered here. Those references might either be attributable as a reference to Ipswich Fringe or to the CS7 allocation so they appear to be open to significant argument about their legal application. It is further confused by the definition itself *'predominantly open land on the edge of an existing urban area'* as *'predominantly'* can be interpreted in several ways. However, the policies considered here refer to 'Ipswich Fringe', 'Urban Edge' or 'Edge of Urban Area'

We cannot find a specific definition in the Core Strategy of the Urban Edge (typically Essex countryside may be considered to be on the edge of London, what are the limits of Urban Edge without definition?) and 'Edge of Urban Area' might be argued as a derivative of Urban Edge or vice versa.

As for Ipswich Fringe certainly CS7 & CS8 as two strategic development sites were defined as being in the Ipswich Fringe in the Core Strategy but that does not define its limits. Within the Core Strategy there is also a defined Functional Ipswich Cluster of Parishes which appear now to be the Ipswich Policy area which itself now appears to be interchangeable with Ipswich Fringe. But some definition might be drawn from the JLP which in section 8 (Policy SP03) Settlement Hierarchy defines the Babergh Ipswich Fringe as the cluster of parishes that sit at the top of the planning hierarchy list as being the focus area for development where a greater level of housing provision will be expected. It consists of the parishes of Pinewood, Belstead, Copdock and Washbrook, Wherstead – Bourne Hill and Wherstead Park & Sproughton.

The implication is significant as if visibly and practically identifiable sensitive countryside outside the defined Settlement Boundaries within the undefined Ipswich Fringe area do not attract the protection of CS2 this may set a precedent and planning argument that will impact on a great deal of countryside. This may well have implication for the interpretation of the wider application of CS11 as well.

However, we do not consider the interpretation is correct because we cannot see how CS2 could have the intention to consider farmland outside the settlement boundaries as not being countryside. Rather that the mix & match of terminology used follows and supports the Core Strategy Policies to develop CS7 and CS8. Our interpretation here is supported by CS3 which sets out in a table the housing delivery requirement for the Ipswich Fringe for the plan policy up to 2031 as 350 homes (*ie policy CS7*). CS3 concluded with an explanation of the table.

*‘The housing figures set out above for the three urban areas (Sudbury and Great Cornard, Hadleigh, and Ipswich Fringe) are to be identified and delivered through the single, strategic, urban edge, extensions planned for each location. Accordingly, no further site specific housing land allocations would need to be identified for these urban areas in the Plan period to meet our chosen housing delivery figure. This will provide the significant benefits of clarity and certainty of approach for these urban areas and allow for making early plans towards their delivery.’*

The intention of the Core Strategy policy here seems to be quite clear; it is an assurance that there would be no more development in the Ipswich Fringe within the plan period.

With that in mind the reference to priority of development in the Babergh Ipswich Fringe (Edge of Urban Area) in Policy CS2 must be a reference in support of CS7 and CS8 and not a reference to further development in that area because CS3 excludes that. This then brings us back to CS2, because if Babergh Ipswich Fringe (Edge of Urban Area) can only be worded in support of CS7 & CS8 this application is outside the settlement boundaries therefore the conclusion of CS2 is in play - *‘Countryside: In the countryside, outside the towns / urban areas, Core and Hinterland Villages defined above, development will only be permitted in exceptional circumstances subject to a proven justifiable need.’*

This seems to be as clear an indication as possible of the intention of the Core Strategy policy for the Ipswich Fringe up to 2031, and should be the basis of what we can expect now just as the Planning Inspector would have expected in approving the Core Strategy.

**P45: Para 4.8:** The indication here is that this site was not included in the Core Strategy because it was considered undeliverable at that time and needed Master Planning. We agree, but by the time the CS7 (WG1) application came forward documents alluded to the development of what is now this application. The timing and sequence of this application sequentially to CS7 has allowed the application for this site, which is far greater and more sensitive, to come forward without being required to apply a Master Plan to the whole area or to the same standards of planning policy undermining the Planning Inspectors recommendations. This appears to be in conflict with the points already raised regarding the Core Strategy and it also appears to have been in conflict with paragraph 50 of the NPPF for such a large development, the requirement for full engagement with the local community in the preparation and agreement over a Masterplan (and not the Local Development Framework Plan as submitted: Ref Planning Report by Impact Planning Services submitted by SPC).

#### **P46: SECTION 5. ASSESSMENT AGAINST CS2, CS1, CS15 AND CS18 OF CORE STRATEGY**

**P46: Para 5.2:** as above we question the interpretation that the exceptional circumstances do not apply.

**P46: Para 5.3:** as explained in relation to our Neighbourhood Plan, (Para 3.13,3.14 and 3.16) our settlement boundaries have probably been given more consideration than most other parishes & we consider are still sound.

#### **P46: SECTION 6 POLICY CS1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**

**P46: Para 6.1:** We feel it is misleading to propose this application meets sustainable conditions. The social & community provisions for this application, a 1,200-home estate, are inadequate only relating to some outdoor equipment and walks that are broadly already used & a school. There is no dedicated indoor provision for entertainment and interaction for social cohesion to create a bonded community. This has the potential to create



a substandard community of limited social sustainability. We also do not believe that enough is being done to ensure adequate primary health care as we are aware that the local surgeries are already oversubscribed with little ability to expand further in their present buildings. Even the rejected 1986 application had more community provision than this application. In relation to the quality of communities being created, we appear to be going backwards.

#### **P47: SECTION 8 LANDSCAPE AND HERITAGE**

This is a very lengthy analysis focused primarily on the applicants LVIA and a review of this document by Place services who appear to have liaised with the applicant's consultant in the creation of the LVIA. We see no consideration of the issues raised by Alison Farmer in her Landscape Appraisal or the issues raised by Lucy Batchelor-Wylam in her report, nor do we see any consideration of the issues raised by SPC. Amongst other things, typically: -

1. Consideration of the consequence of & impact on the identified Valued Landscape area.
2. Consideration of the impact on the Special Landscape Area and how what has already been done should be a warning to limit the harm already inflicted on this Valued and Special landscape.
3. The adverse impact of a valley side of a 'rising roofscape' which cannot be screened because the density of homes would preclude planting of the size of trees between them that would be required to screen out the roofs.
4. The impact of the proposed ring of white/pastel sided frontages around the lower edge of the development in a ring all around almost enclosing the valley.

**P47: At Para 8.3-8.5 and 8.7:** It is suggested that the impact of the applicants WG1 development on the landscape has reduced the quality and value of the valley landscape area. It is rather unjust to support an argument that the damage you have done is justification to do more damage.

However, although that claim (however unfair) may be true (as things stand at this moment) it is misleading. This because we are still waiting for the tree planting proposed by the applicant in their CS7 submission to be done, and to eventually grow to the height they promised to screen the development to minimise adverse impact on the valley landscape.

The delay in this process along with other arboriculture issues delayed, overlooked, reduced or minimised by both the developer and the council give us little confidence that any meaningful planting to adequately mitigate adverse impact will ever happen. The only thing that has been proposed is planting to create 'filtered'? views and indicative pastel drawings that are not supported by definitive plan drawings or specifications of planting.

Also, many of the most important views of the landscape are not currently adversely impacted by the unfinished edge of WG1 due to the valley sides and existing trees. But would be by this application if it was approved in its current form.

The two landscape reports that have not been referenced here (both from consultants who worked on the Sensitivity and Capacity assessment Ipswich Fringes report for the councils to inform policy around development of the Ipswich Fringe area) come to very different conclusions from the applicants LVIA regarding the level of adverse impact of the proposal.

**P47: At Para 8.6:** the area of open space is described as a benefit. There is some truth in this but it is also misleading. Just like the 1986 application the North of the site is floodplain and we assume any development downhill of the dam would be irresponsible (though it appears to be considered acceptable to subject the listed Red House to that risk). Also, much of the land around Red House cannot be developed due to covenants. We understand that the covenants also prevent changing this land from productive farmland to community open space and a suggestion has been made to put cattle on it, so in reality no new or additional ecological beneficial has been provided. However, the applicant does leave a substantial area of the lower valley slopes undeveloped



or changed into SUD's basins though they will also corrupt the landform and are an unavoidable consequence for the developer that must be located somewhere. This also applies to paras 8.8 & 8.9.

**P49: Para 8.13:** The resume of objection on Heritage grounds is deficient in that that the BMSDC consultant from Place Services was also unable to support the application as well as the Heritage officer. The actual main concern by Place Services was the development on the ridge to the West of Red House.

**P49: Para 8.14:** These are also further objections and in the case of our objection the primary concern relating to development on the valley side West of Red House is not addressed but a comment made about access from Church Lane which is unrealistic.

**P50: Para 8.15:** is again misleading. The full range of the LUC survey was to re-assess all the sites proposed for the BMSDC JLP for adverse heritage impact. This occurred because Historic England were not happy with the initial assessment. The LUC appraisal is not a document approving or rejecting any site but just providing an unbiased report of any adverse heritage impact and advice. So, if Historic England have not objected to it they must consider the advice is acceptable.

The LUC Heritage Impact Assessment is an adopted document by BMSDC with the JLP. There were four sites that acquired the highest score level of Medium to High adverse impact. One was the Hopkins Homes site and another was this application site. The report quite clearly and graphically by site plan demonstrates that development on the valley side/ridge to the west of Red House would present the highest level of harm. The adverse heritage impact on this site therefore represented the highest level of heritage harm assessed by the JLP across the BMSDC and matched the Hopkins Homes site in this respect.

This is very relevant information because the Hopkins homes site was rejected twice by the planning committee and subsequently rejected on appeal with reference to this report, and for similar grounds as our objections to this application. We feel the Planning Committee should be aware of this information.

Plan diagram showing extent and severity of the adverse heritage impact on Hopkins Home site and from same report the plan diagram for this application abstracted from the BMSDC adopted LUC Heritage Impact Appraisal for proposed JLP sites.

Figure 15.16: LA116 Sproughton options for sustainable development

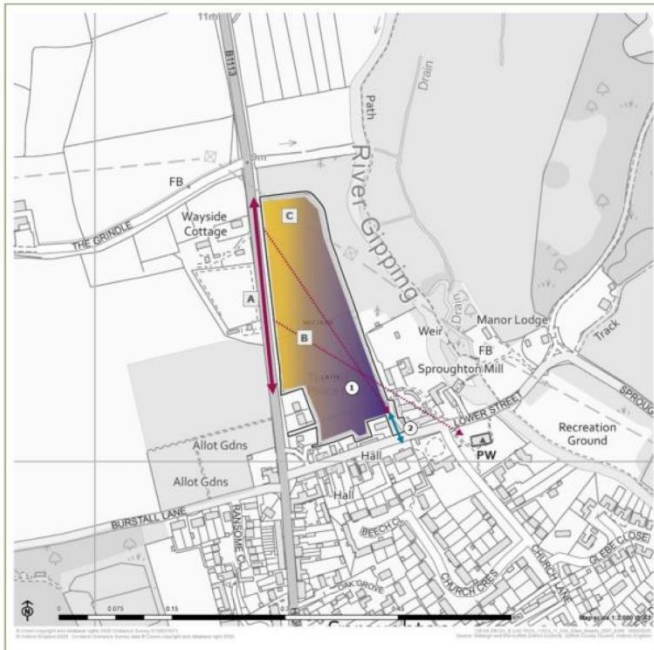
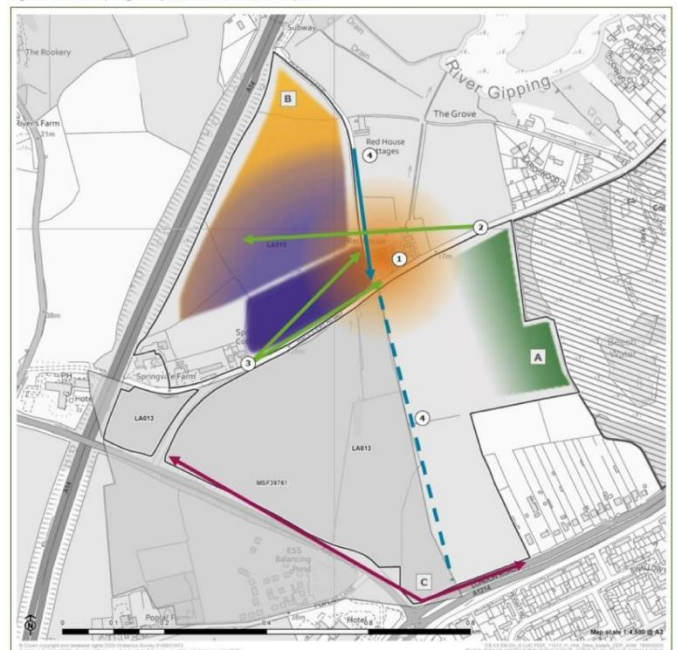


Figure 7.15: LA013 Sproughton options for sustainable development



The caveat referenced from 2.22 of the report is simply one of a raft of what looks like standard caveat's. We would also note that any reference to the submitted Heritage Impact Assessment by Michael Collins that was submitted by the owner's of Red House Farm in support of their objection is also omitted from the Committee report.

**P50: Para 8.16:** Less than Substantial harm can be a misleading term and anything higher would probably have to relate to something like harm to a significant national monument. As above, the level of Medium to High adverse heritage impact in the range of less than substantial harm was actually the highest level of adverse heritage impact attributed to only four sites across all the sites in BMSDC proposed for adoption by the JLP.

**Benefits:** This section then goes on to consider the potential benefits many of which are simply required for any development or are only needed if the development is built. We have commented on why there is a large area of green space recorded. We question the Biodiversity net gain as it does not consider any net harm to the adjacent Wildlife sites or transitory movement.

PV panels on WG1 have only been a small provision to achieve the level they needed to acquire the required efficiency standard so we are sceptical about any significant benefit.

So far the highway improvements just seem to add to the journey time through the area and other improvements are only required if the development is built

EV charging points will be a necessity for any new development and there is no assurance here about how many will be provided.

We are not sure that footpath improvements will actually be improvements on the pleasant rural nature of the present rugged paths.

**P51: At para 8.20:** the advice is that the benefits are considered to outweigh the significance of less than Substantial harm. Again this might be misleading since the Medium to High level of less than Substantial harm is the highest level of harm considered in any JLP allocation and this significant level is apportioned to the site in several unquoted heritage reports.

**P51: Para 8.21:** This seems to support our objections since the visual and setting harm we are concerned that this application will inflict on the heritage asset, particularly by a significant isolated section of the development to the west of Red House, seems to be in conflict with CN06.

**P51: Para 8.21/8.23:** Sets out the balance in the same misleading way as we have already commented at 8.20 and 8.16 above.

## **P52: SECTION 9. DESIGN, OPEN SPACE AND GREEN INFRASTRUCTURE**

**P52: Para 9.1:** Policy CS15 sets out a great number of standards. Referenced is 15(ii) which seems to support our objections as the existing character will be destroyed. However not by so much as the standards of the omitted section (i) respect the landscape, landscape features, streetscape / townscape, heritage assets, important spaces and historic views. CS15 goes on to say that for a development of scale (750 homes appears to be of scale), a Master Plan should be produced and provides more support for the preservation of landscape in several paragraphs.

**P52: Para 9.3 -9.6:** again expands on the green space provided which is a little misleading as it is an inevitable residual consequence of the restrictions applicable to the land they purchased.

## **P53: SECTION 10 ECONOMY & EMPLOYMENT**

**P53 Para 10.1 -10.2:** The interpretation of the impact of the site in relation to CS15(iii) is short-sighted and unsustainable. It is true that if these homes are built then during that time jobs will be created. But the job creation benefit is misleading. On a building site, homes are built on a rolling conveyer belt of trades etc.

Typically, if 60 homes are built each year that is not 1.5 x 60 jobs for the year because at any one time there might only be 20 homes being worked on with perhaps 5 per month being completed. So there is only an average of 20 x 1.5 (ie 30) jobs per year (plus potential jobs in community). By comparison each year 60 homes will be occupied by about 100 – 120 people who will all need jobs. So, during the construction period an average of only 30 jobs might exist but each year the new occupants create an increasing potential local employment demand rising by 100-120 per year who need to finance their mortgages.

If there is not a local unfulfilled demand for employees with jobs of sufficient importance to attract a wage capable of financing a mortgage at the level required (Prices from £295,000 to £470,000<sup>1</sup>) then this is unsustainable as either over the period of the development potentially a thousand plus new residents will be scratching for decent local employment or they will be forced to commute elsewhere which will harmfully increase travel demands on road and rail and conflicts with CS15. It follows that to create a healthy community that is progressively green, good well-paid jobs must increase proportionately with new homes. That is not happening. Our Housing Needs Survey showed the parishioners could only afford houses in the parish that fall into the 'affordable home' category.

**P53: SECTION 11 SERVICES AND ACCESSIBILITY**

The site neglects some glaring omissions that are significant to the health/wellbeing of both individuals and a community (with 1,200 homes this is a big community twice the size of the established village community). Provision for faith centres &/or Community hubs like a community hall that support the social cohesion & wellbeing of the community is completely absent from this proposal. The attitude to primary health care also appears to be naive or unresearched. The potential of another 1,800 patients will not be accommodated without some proper concerned joined up thinking. The same applies to NHS dental care which is virtually non-existent in this area. **See detailed comment on page 5, 'P20 NHS 15/06/2021'.**

**P54: SECTION 12 ECOLOGY AND BIODIVERSITY**

This has already been covered but basically the stated compliance to CS15 (vii)(x) and NPPF is misleading since although there is compliance with contributions towards RAMS and provision of open greenspace which will also qualify as a SANG provision there is a failure to follow CS15 by not giving proper consideration to the adjacent locally designated Wildlife areas both in the net harm that may be done to them by ignoring the existing need for connectivity between habitat areas and by only considering biodiversity gains in relation to the existing sites resident biodiversity which is misleading as that will be a negligible base level since cultivated fields have little resident biodiversity and tend to be pathways for migratory or transitory movement. This ignores the potential net losses that may be inflicted on the adjacent wildlife sites and transitory movements between habitats.

**P55: SECTION 14 SUSTAINABILITY AND CLIMATE CHANGE**

We have been disappointed by the provisions at WG1 where any renewable provision is finely calculated to just achieve the required levels rather than any ambitious will to promote and provide sustainable solutions.

**P56: SECTION 15 FLOODING, SURFACE WATER AND FOUL WATER DISPOSAL**

We have observed as the water disposal issues have been thrashed out and wonder if the committee is aware of how tenuous the acceptance by the water authorities are. The foul water issue is still not resolved which is very concerning for anyone downstream as affluent is frequently observed in the river. In relation to flood water, Hadleigh Road flooded seven times in November running down to Red House Farm<sup>2</sup> despite some efforts to keep the drains and waterways clear. We fail to be convinced that there is a responsible assessment of the risk to this heritage asset that will sit downstream of the dam discharging the increased surface water accumulated from the development of both WG1 and WG2. It also ignores the risk of failure of the groundworks to the SUDS provisions and we wonder if planning would allow a housing application below a dam where Red House Farm now sits. Also in this respect we fail to understand why the Review of the Catchment Hydrology and other Drainage Related Matters report by JPC Environmental Services submitted by the owners from Red House Farm supporting their objection has not been referenced.

**P58: SECTION 18 CONCLUSION ON CS15**

As a consequence of the points above we consider are misleading we do not agree with this conclusion.

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<sup>1</sup> <https://www.taylorwimpey.co.uk/new-homes/ipswich/wolsey-grange>

<sup>2</sup> See Appendix containing email from the owners of Red House Farm



**P58: SECTION 19 POLICY CS18 MIX AND TYPES OF HOUSING/ ALSO 22 SPROUGHTON**

This section suggests that the housing mix can be considered at subsequent reserved matters. However, this is misleading as the application sets out parameter plans that include the positioning of different height buildings, and that from our experience will be the minimum limits that the developer will insist on if that is approved. These parameters are in conflict with our Neighbourhood Plan and although it is inconceivable that this will not be adopted before any construction starts on this site if this application and parameter plans are approved now then they will not be overturned, and the standards required by our NP will not be enforceable.

These parameters are in any case unacceptable as a significant element of the proposal is on the valley Side to the West of Red House where the maximum adverse heritage impact would be inflicted on the heritage asset.

**P58: SECTION 21 PLANNING OBLIGATIONS/CIL**

The Highway/Transport improvements are only necessary to accommodate the expansion so they are not benefits.

**P59: SECTION 22 PARISH COUNCIL COMMENTS**

See also Section 19 comment above. It is misleading to say that the majority of the matters we raised have been dealt with, especially as much of the evidence and reports we provided has not been considered in this report. This is equally true for the owner's of Red House Farm who submitted a comprehensive report supported by several detailed consultant reports none of which is referenced. Since Red House Farm and the issues around that appear to us to be a primary issue in this application we do not think it is acceptable that their submissions have not been considered in some detail.

**P60: PART FOUR – CONCLUSIONS**

As we have already made observations on most of the matters upon which this report draws its conclusions we will endeavour not to replicate but refer.

**P61 Para 23.5:** This is misleading as the Core Strategy assessment of this site said it was not considered sequentially suitable within the Core Strategy period as did the Planning Inspector, who said that if it had been a Master Plan would be needed to consider the impact of any application on the whole area (ie WG1 and WG2). This is further enforced in the 'table explained' of CS3 which explains that it was correct that the 350 CS7 allocation should be the limit of development in the Ipswich Fringe Area within the plan period to 2031 *'This will provide the significant benefits of clarity and certainty of approach for these urban areas and allow for making early plans towards their delivery.'* (Ref p6-8 of this response)

**P61 Para.23.6:** We consider this to be misleading and potentially a risky interpretation. The explanation of this interpretation is very lengthy in section 4 and 5 of Part 3 and we have commented about our concerns about the interpretation drawn in this committee report which could have significant implications on what is considered countryside. (Ref p6-8 of this response).

**P61 Para 23.7:** This list of benefits is previously commented on in this response at Para 8.16 Benefits (p11) Para 8.6 (p9) and Planning History 1986 application benefits (p4)

**P62 Para 23.8:** As previously commented the allocation for Sproughton of 350 homes up to 2031 in CS7 and CS3 has already been increased by 125 to 475 homes which should proportionately represent the necessary provision up to 2038.

**P62 Para 23.11:** as above in 23.8, but more specifically the omitted comparison with the Hopkins Homes application may be significantly relevant to this conclusion (see Para 8.15, p10 of this response).

**P62 Para 23.12:** See section 8 and para 8.3. etc (p9 of this response)

**P62 Para 23.13:** See Sections 14 (p12), 12, 11 (p12), Para 10.1-10.2 (p11) and Para 6.1 (p8 of this response)

**P62 Para 23.14:** See comments again re benefits at Para 8.16 & Benefits (p11) also Section 21 (p13)

**P63 Para 23.15:** See comments at section 12 (p12 of this response)

## **CONDITIONS**

**If the Planning Committee is minded to approve the application we would like the below 11 conditions be attached to the planning approval that SPC feel will make the development more sustainable and better for the new residents.. We note the conditions set by the Planning Officers report (P64-5) of which some are similar to the below.**

1. Sproughton PC request that all subsequent planning applications for this site are brought back to the Planning Committee. This application is now the most significant application for the parish.
2. Sproughton PC also request that we be involved in reviewing the draft S106 &/or CiL agreement before it is finalised. We have worked with Babergh Planning in this way before. This is to include any discussions to take over the proposed Sustainable Accessible Natural Greenspace (SANG) or a community hall if provided.
3. 35% affordable housing to be confirmed before first build on site.
4. The mix of homes should comply with the mix specified on the Sproughton Neighbourhood plan i.e. no building to be above 2 storeys (ground & first floor) to comply with the NP (An average slab to ridge height of 8m is normal. We consider this appropriate NOT the 9.5m specified in the document submitted by Taylor Wimpey '210317WG2\_Parameter Plan – Maximum Building Heights Plan'. This 9.5m height feels as though it is actively allowing for extension into the roof space thereby creating a 2.5 storey building out of a supposed 2 storey building.)
5. All homes to meet the criteria defined with the Sproughton Neighbourhood Plan Design Codes document.
6. Solar panels & PV cells to be installed on all roofs facing in the appropriate direction.
7. Battery walls to be installed in homes with solar panels & PV cells.
8. Rainwater tanks to be installed in all gardens.
9. Existing wildlife corridors between wildlife/habitat areas adjacent to the site and between those and the wider countryside running adjacent to London Road, via a1071 bridge, via Church Lane underpass and via River Gipping A14 Road bridge to be maintained and/or enhanced by planting trees & hedges (pollinator friendly planting) – for cover to facilitate movement of any transitory wildlife up to and including Badgers and Deer in size. Placement & composition to be agreed with Sproughton PC.
10. All homes to be built with one or more bee bricks. Swift boxes, insect hotels, owl boxes & hedgehog hotels to be installed across the site.
11. Community facilities are essential. We would ask for a condition to provide at minimum a community hall building with parking within the layout of the site at the expense of Taylor Wimpey in a position suitable for the community activities for the whole WG1 and WG2 estate.
12. Taylor Wimpey to retract the proposal for a line of white fronted homes around the lower/valley side perimeter of the estate.
13. Condition to agree with Sproughton Parish Council prior to commencement of any building adequate Tree planting to include adequate screening of development from Red House and for tree planting to be agreed to achieve an adequate height within the development to achieve some screening of the roofscape. This planting in relation to any development on the valley side to the west of Red House must be significant with the capacity to screen both the development edge and the roofscape from both Red House and from the east side of the valley looking across the top of Red House.

**APPENDIX – Email – Owners of Red House Farm regarding Flooding**

