



Committee report

Planning Committee South – 26 July 2022

Application no DC/21/4003/ARM

Location

Land to the south and east of Adastral Park

Expiry date Extension of time agreed until 29 July 2022

Application type Approval of Reserved Matters

Applicant Taylor Wimpey

Parish Martlesham

Proposal Approval of reserved matters - the construction of 22 dwellings together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase W1a) - on DC/20/1234/VOC.

Case Officer Rachel Lambert
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1. Summary

Proposal

- 1.1. Approval of reserved matters – the construction of 22 dwellings together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase W1a) - on DC/20/1234/VOC. This is the fourth application for reserved matters approval of housing on the site, it is also accompanied by a fourth application for Phase W1.

Committee reason

- 1.2. In accordance with the scheme of delegation, the Head of Planning and Coastal Management has requested that the decision is to be put to members at the respective planning committee due to the significance of the Brightwell Lakes proposal, particularly as it forms part of the first reserved matters application(s) for the design of housing.
- 1.3. Future reserved matters application would not automatically be referred to Planning Committee unless triggered through the Referral Panel process.

Recommendation

- 1.4. Authority to approve subject to no new material issues being raised during the latest re-consultation period, all other matters being resolved, and agreement of conditions.

2. Site description

- 2.1. The subject site relates to part of the wider Brightwell Lakes strategic development site. Due to the scale of the site, the development will be delivered in phases. This particular application relates to one of four parcels that have been simultaneously submitted for reserved matters approval, which extends to a total area of 5.51 ha. The applicant advises that this will represent the first phases of residential development to be delivered at Brightwell Lakes.
- 2.2. This area of the scheme, referred to as 'Phase W1a', is located east of the A12, with a site area measuring approximately 0.38ha. It is bound by the A12 to the west and Central Boulevard Spine Road to the north, with the wider 'W1' phase to the east.
- 2.3. It is proposed that Phase W1a is made up of 22 new dwellings, along with associated landscaping, car parking, access and other infrastructure. The main frontage of the site is set along the Central Boulevard Spine Road with shared surfaces to serve other parts of the phase, with the main vehicular route into Phase W1a will be direct from the A12 and Spine Road.

Planning history

- 2.4. The relevant planning history for the site includes the following extant and pending applications:
- **DC/16/5277/SCO:** Request for EIA Scoping Opinion: Application for 2000 residential homes and associated infrastructure.

Permitted applications

- **DC/17/1435/OUT:** Original application
- **DC/18/4644/VOC:** Variation of DC/17/1435/OUT
- **DC/20/1233/OUT:** Alternative access road to that under DC/18/1644/VOC
- **DC/20/1234/VOC:** Variation to DC/18/4644/VOC
- **DC/21/3434/DRC:** Partial discharge of Condition(s) 18, 28b, 57 on application DC/17/1435/OUT

Applications pending consideration

- **DC/18/2959/DRC:** Full and Partial Discharge of Conditions of DC/17/1435/OUT in relation to conditions: 6, 8, 9, 11, 14, 24, 28, 29, 30, 41, 43, 58, 61 Through information submitted under Approval of Reserved Matters applications - DC/18/2774/ARM and DC/18/2775/ARM

- **DC/18/2774/ARM:** Reserved matters in respect of DC/17/1435/OUT - Site Entrance and Boulevard comprising the detail of the following elements:
 - The new junction with the A12
 - The entrance to the site, including the new entrance feature / acoustic bund along the A12 boundary
 - The new boulevard from the site entrance to the junction with the Eastern Spine Road
 - The new Western Spine Road and new Junction with the Ipswich Road, incorporating measures required by condition 43 of DC/17/1435/OUT
 - The Landscaping to the entrance and zone along the boulevard / spine road
 - The new Drainage to the boulevard and spine road, including pumping station off the Ipswich Road, in the Valley Corridor
 - The new incoming utility supplies along the route of the boulevard and spine road

This application has authority for approval from Planning Committee pending final conclusion of details. This was on hold pending sale of the site to Taylor Wimpey but is due to be concluded in the near future.

- **DC/18/2775/ARM:** Reserved matters in respect of DC/17/1435/OUT: Green Infrastructure comprising the detail of the following elements:
 - Main Green Infrastructure - SANG
 - SANG Valley Corridor
 - SANG Links to Southern Boundary
 - Allotments and Community Orchards to area 5b

This application has authority for approval from Planning Committee pending final conclusion of details. This was on hold pending sale of the site to Taylor Wimpey but is due to be concluded in the near future.

- **DC/21/4002/ARM:** Approval of reserved matters - the construction of 173 dwellings (including 80 affordable houses) together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase W1) - on DC/20/1234/VOC.

This application is to be considered alongside this application by Planning Committee South.

- **DC/21/4004/ARM:** Approval of reserved matters - the construction of 119 dwellings (including 34 affordable houses), associated works, landscaping and infrastructure for Phase E1, together with details of Green Infrastructure relating to the adjoining part of the southern boundary (Ipswich Road) SANG - on DC/20/1234/VOC.

This application has authority for approval from Planning Committee pending final conclusion of details and is due to be concluded in the near future.

- **DC/21/4005/ARM:** Approval of reserved matters - the construction of three dwellings together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase E1a) - on DC/17/1435/OUT

This application has authority for approval from Planning Committee pending final conclusion of details and is due to be concluded in the near future.

3. Proposal

- 3.1. This reserved matters application relates to Condition 1 of the outline planning permission – ref. DC/20/1234/VOC, which states:

The development hereby approved will be delivered in a phased manner in accordance with Conditions 2, 6, 7 and 9. Approval of the details of appearance, landscaping, layout and scale (hereinafter called "the reserved matters") for each phase shall be obtained from the Local Planning Authority in writing before development (except development for means of access and site reprofiling works) in the areas the subject of the reserved matters commences. Thereafter, the development shall be implemented in accordance with the approved reserved matters.

Reason: As provided for in the Town and Country Planning (Development Management Procedure) (England) Order 2015

- 3.2. This submission seeks approval of the details relating to appearance, landscaping, layout and scale for the construction of 22 dwellings, associated works, landscaping and infrastructure for Brightwell Lakes - Phase W1a.
- 3.3. The eastern part of this wider phase, known as Phase W1, is subject to a separate reserved matters submission (DC/21/4002/ARM); however, both W1 and W1a parcels have been considered collectively.
- 3.4. A number of planning conditions within the outline permission require the submission of details as part of/or prior to a reserved matters submission. Those that are addressed within this submission are listed below:
- Condition 1 – Appearance, landscaping, layout and scale
 - Condition 8 – Character banding plan
 - Condition 11 – Access strategy
 - Condition 12 – Landscaping details
 - Condition 14 – Environmental Action Plan Part 2
 - Condition 23 – Building materials
 - Condition 24 – Boundary treatment plan
 - Condition 25 – Recycling/bin storage plan
 - Condition 26 – Cycle storage
 - Condition 28 – Arboricultural impact assessment and tree survey
 - Condition 30 – Earthworks strategy plan
 - Condition 41 – Details of estate roads and footpaths
 - Condition 48 – Surface water drainage scheme
 - Condition 60 – Noise attenuation scheme
 - Condition 61 – External lighting
 - Condition 65 – M4(2)/M4(3) compliance (5%)
- 3.5. Other pre-commencement and prior-to-occupation conditions, as listed on the decision notice, will be subject to separate discharge of conditions applications.

3.6. Conditions required at this reserved matters stage that are not included within this submission are:

- Condition 6 – Phasing strategy for western area (see app. DC/18/2774/ARM)
- Condition 9 – SANG/strategic landscaping (see app. DC/18/2775/ARM)
- Condition 43 – Traffic reduction design strategy (outside red line – see DC/18/2959/DRC)
- Condition 58 – Design and construction detail of entire noise screening bund adjacent to the A12 (see app. DC/18/2774/ARM)

4. Consultation

Third Party Representations

4.1. No third-party responses were received.

Statutory and non-statutory consultees

4.2. Due to the frequency of consultation throughout processing the application, all comments received are collated within one table – with the respective consultation start dates and ‘date reply received’ listed chronologically.

4.3. The latest re-consultation is due to end on **18 July 2022** - this follows receipt of the below updates/revisions:

- Design: A full set of drawings have been prepared to revise the layout, elevations and detailing such as boundary treatments, including additional street scene drawings, revised parking plans, elevation drawings, and a refuse strategy which shows bin storage and collection points. Floor plans for each dwelling and house types are provided. Design and layout plans have also been amended to align with comments from Suffolk County Council Highways. These include amendments to parking areas and visitor parking bays as well as further consideration of inter visibility for vehicles as well as cycles and pedestrians. It has also been agreed that some aspects can be dealt with as part of conditions in future s38 applications.
- Ecology: Environmental Action Plan prepared by SES has been updated to show the revised layout plans for parcels W1 and W1a. Appendix 7 shows the proposed locations of features to support ecology such as bee bricks, bat boxes, swift boxes and hedgehog tunnels being proposed.
- Engineering: Stantec have provided a series of drawings to show technical information such as site contours, water infiltration rates, vehicle tracking, highway adoption plan, surface water drainage plan and details of Sustainable Drainage Systems. Each of these reflects the revised layout and have been prepared in response to comments received from the Lead Local Flood Authority. A revised Technical Note (June 2022) has been provided along with additional drawings including a Flood Exceedance Plan.
- Landscape: Landscape plans have been updated to reflect the revised site layout, and to include more native and climate resilient planting where possible, along with the inclusion of more pine trees at the southern boundary.

- Lighting: A revised indicative lighting strategy for Parcels W1 and W1a reflects the amended design layout for the proposed development, with reference to Condition 61 of the outline planning permission (DC/20/1234/VOC).
- Statement of Community Involvement: Submission of an addendum to the Statement of Community Involvement (SCI) provides an update on the engagement with the local community that has taken place since the original submissions in August 2021.
- Noise assessment: A revised Noise Assessment (RP01-21254 Rev. 5) addresses comments raised by the environmental health officer, including updated façade specifications.

Consultee	Date consulted	Date reply received
East Suffolk Building Control	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date 18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Brightwell Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	19 September 2021 No response 5 June 2022 No response – <i>consultation end date 18 July 2022</i>
Summary of comments: <u>19 September 2021</u> “The Parish Council has no comments to make about this reserved matters application.” <u>5 June 2022</u> “The Parish Council has no comments to make about this application.”		

Consultee	Date consulted	Date reply received
Bucklesham Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	4 November 2021 No response 4 May 2022 7 July 2022
Summary of comments: <u>4 November 2021</u> “No comment.”		

4 May 2022

"No comment."

7 July 2022

"No comment."

Consultee	Date consulted	Date reply received
East Suffolk Design and Conservation	8 September 2021 13 September 2021 20 May 2022 4 July 2022	28 October 2021 - No response No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments: Internal consultee – comments incorporated within reporting.		

Consultee	Date consulted	Date reply received
Disability Forum	8 September 2021 13 September 2021 20 May 2022 4 July 2022	24 September 2021 4 July 2022
Summary of comments: <u>24 September 2021</u> "All dwellings should be visitable and meet Part M4(1), and 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2). It is our view that in housing developments of over 10 dwellings, at least one of the dwellings should be built to wheelchair standard Part M4(3). It is also our view that 3% of the dwellings in housing developments of over 10 dwellings should be bungalows to assist people with mobility problems and to assist people who wish to downsize from larger dwellings. Every effort should be made to ensure all footpaths are wide enough for wheelchair users, with a minimum width of 1500mm, and that any dropped kerbs are absolutely level with the road for ease of access. Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used." <u>4 July 2022</u> "The Suffolk Coastal Disability Forum would like to remind the applicant that all dwellings should meet Part M of the Building Regulations in this planning application. All dwellings should be visitable and meet Part M4(1), and 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2). It is our view that in housing developments of over 10 dwellings, at least one of the dwellings should be built to wheelchair standard Part M4(3). It is also our view that 3% of the dwellings in housing developments of over 10 dwellings should be bungalows to assist people with mobility problems and to assist people who wish to downsize from larger dwellings. Every effort should be made to ensure all footpaths are wide enough for wheelchair users, with a minimum width of 1500mm, and that any dropped kerbs are absolutely level with the road for ease of access. Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used."		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date 18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	8 September 2021 13 September 2021 20 May 2022 4 July 2022	6 December 2021 No response No response No response – <i>consultation end date 18 July 2022</i>
Summary of comments: Internal consultee – comments incorporated within reporting.		

Consultee	Date consulted	Date reply received
Natural England	8 September 2021 13 September 2021 20 May 2022 4 July 2022	12 October 2021 No response No response No response – <i>consultation end date 18 July 2022</i>
<p>Summary of comments:</p> <p><u>12 October 2021</u> “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 the following European sites: • Alde-Ore Estuary Special Protection Area (SPA) • Alde-Ore Estuary Ramsar site • Alde-Ore and Butley Estuaries SPA • Deben Estuary SPA • Deben Estuary Ramsar • Orfordness-Shingle Street SAC • Sandlings SPA • Stour and Orwell Estuaries SPA • Stour and Orwell Estuaries Ramsar site • damage or destroy the interest features for which the underpinning Sites of Special Scientific Interest for the above European sites have 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: • This application should be compliant with condition 9 of the outline planning application in order to ensure that there will be no adverse effect on the integrity of any European designated site. Page 2 of 7 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.”</p> <p>See Public Access for full response.</p>		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	8 September 2021 13 September 2021 21 April 2022 20 May 2022 4 July 2022	No response No response No response No response 6 July 2022
Summary of comments: Internal consultee – comments incorporated within reporting.		

Consultee	Date consulted	Date reply received
SCC Fire and Rescue Service	8 September 2021 13 September 2021 20 May 2022 4 July 2022	8 September 2021 No response 23 May 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments: <u>8 September 2021</u> “Please be advised that the Suffolk Fire & Rescue Service have made comment on this site, under the original planning application DC/17/1435/OUT, which we note has been published. We also note that Condition 44 was placed against this planning application. Please ensure that this Condition follows this build, through all the phases, to completion. If you have any queries, please let us know, quoting the Fire Ref. number.”		

Consultee	Date consulted	Date reply received
Hemley Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Kesgrave Town Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response 14 June 2022 No response – <i>consultation end date 18 July 2022</i>
Summary of comments:		
<u>14 June 2022</u> “Support - voting was unanimous.”		

Consultee	Date consulted	Date reply received
Kirton Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	4 October 2021 8 October 2021 No response 11 June 2022
Summary of comments:		
<u>4 October 2021</u> “Kirton & Falkenham Parish Council considered this application at its meeting in 20th September 2021 and objects to the proposals, having severe reservation about generated traffic that will put utmost strain on an already over capacity road network which relies on the main arterial roads (A12/A14) to allow cars and HGV’s to travel to and from work etc. This is a peninsular, so alternative routes are unavailable as Ipswich is very quickly gridlocked. Noise, light and construction dust pollution will have a massive effect on wildlife and existing homeowners in what is a tranquil area. All surface water will inevitably flow into the Mill River and surrounding watercourses leading to potential flooding downstream.”		
<u>8 October 2021</u> “Kirton & Falkenham Parish Council considered this application at its meeting in 20th September 2021 and objects to the proposals, having severe reservation about generated traffic that will put utmost strain on an already over capacity road network which relies on the main arterial roads (A12/A14) to allow cars and HGV’s to travel to and from work etc. This is a peninsular, so alternative routes are unavailable as Ipswich is very quickly gridlocked. Noise, light and construction dust pollution will have a massive effect on wildlife and existing homeowners in what is a tranquil area. All surface water will inevitably flow into the Mill River and surrounding watercourses leading to potential flooding downstream.”		
<u>11 June 2022</u> “Kirton & Falkenham Have no comments to make on this application.”		

Consultee	Date consulted	Date reply received
Martlesham Parish Council	8 September 2021	22 October 2021
	13 September 2021	No response
	20 May 2022	14 June 2022
	4 July 2022	6 July 2022
<p>Summary of comments:</p> <p><u>22 October 2021</u></p> <p>“Overview There is much to be welcomed in these proposals. However, the applications, which are required to prove conformity with the original outline planning permission, still lack the detail required by that original planning permission. 1. We have considered the 4 individual applications collectively and holistically. 2. Our response assumes all the pre-requisite information to the ARMS, as detailed in the Outline Planning Conditions, has been filed with East Suffolk Council (‘ESC’). 3. Our response should be read in the context of (i) these 4 applications represent only the first phase of a 17-year total build period for 2000 dwellings, (ii) our growing concern about the cumulative impact of these and all other major projects on the communities of Martlesham and Martlesham Heath as a Parish. We need to see a greater effort at an executive level across East Suffolk Council and Suffolk County Council to manage a coordinated response on these major projects which include: • The application for 300 housesⁱ by the Suffolk Constabulary at its Martlesham Heath Headquarters • The Sizewell C application which will heavily and directly impact the A12 traffic flow at Martlesham • The Suffolk County Council proposed A12 improvements at Martlesham • The application for 47 dwellings on Black Tiles Laneⁱⁱ in Martlesham • The Woodbridge Town FC Policy 12.25 for 120 dwellings • East Anglia One and Three, and the • McCarthy Stone Retirement Developmentⁱⁱⁱ. 4. We believe an opportunity is being missed to create a flagship development in which the latest proven and innovative, viable, technological solutions are showcased on a scale befitting the current climate emergency and size of the development. We are very disappointed with the lack of imagination which goes against ESC’s own Environmental Guidance Note publication and the stated aspirations of the Developer. 2/10 5. Martlesham Parish Council (‘MPC’), along with East Suffolk Council, has declared a climate emergency. We have yet to see evidence of the Developer meeting commitments about the sustainable nature of this development, particularly with reference to their stated commitment to deliver: a) Environmentally friendly house types and use sustainable and reduced carbon footprint building methods; to incorporate building fabric first principles, bee bricks, hedgehog highways, water butts, soakaways, grey water use, etc b) Air source heat pumps or other energy efficient heating sources c) Onsite household recycling facilities d) Highspeed broadband appropriate to current and future recreational and working needs e) Reduced construction -related waste on site, and f) Build standards higher than the minimum required by Part L Building Regulations. 6. MPC would welcome further detailed information regarding the East Suffolk Council call for new buildings to be constructed to standards which exceed the minimum Buildings Regulation requirements and achieve sustainable BREEAM^{iv} and Passivhaus standards. 7. The Developer must explain how this first phase housing will connect with existing facilities (e.g., Retail Park, shopping, medical facilities, local employment). This must be by means of connecting travel other than private cars along the A12 corridor and must be put in place before occupation of the first dwelling. 8. An air quality monitoring regime should be imposed by Planning Conditions to protect both current Martlesham residents and future Brightwell Lakes residents. The following are our more detailed comments: Construction and Deliveries Traffic Management Plan 1 We note Outline Planning Condition 18 requires an approved Construction Method Statement to be submitted in the interests of highway safety and to inform Brightwell Lake residents. We would welcome early sight of that document. 2. This development is of such significance to our Parish that we would like to see far greater</p>		

involvement from Suffolk County Council Highways to ensure properly coordinated solutions to the timing of the A12 improvements, the Brightwell Lakes access works and the prolonged construction works to mitigate the general disruption, rat running and congestion that residents, old and new, will experience for the next 17 years. 3. To maintain the quality of life for all Martlesham residents, we would welcome any advisory literature produced by the Developer or the Developer's agent to be made available to all Martlesham residents going forward. We suggest this could be done through Martlesham Parish Council or through the appointment of a community liaison officer. We consider that the appointment of a community liaison officer might be an effective way to communicate details of the build as it takes place, and any implications for residents. 3/10 Connectivity 4. The Outline Planning Conditions require, before first occupation: a. Cross-site routes for cyclists and pedestrians to be identified and constructed b. Construction of the new routes to meet stated surface specifications c. Cycle and footways. 5. MPC would welcome further detailed information regarding the connectivity plan for W1 W1a E1 and E1a for the first residents. We would also welcome further detail how the development connects with public transport and offers car share, and how the occupants of the first dwellings will walk or cycle to the Martlesham retail park and employment areas. If sustainable transport is to be encouraged, it is essential for the construction of accessible, safe, well-lit connecting footways and cycleways to local facilities from the outset. Medical Facilities 6. According to the timeline anticipated by the Developers, the first legal completion date is anticipated to be February 2024. This means that medical facilities to serve the first residents will be required to be in place within 2 years. The S.106 Agreement Schedule 9 Health Centre paragraph 1, requires the Developer "1.1 To (a) provide the Health Centre on Site, or (b) pay the Health Centre Contribution to the District Council in accordance with the terms of this Schedule." 7. Our own position on this matter is clearly stated in the Martlesham Neighbourhood Plan, paragraph 4.22: "the Parish Council will continue to work with all relevant parties to try to ensure that any new surgery provision which serves all or part of the community in the Neighbourhood Plan Area complements rather than displaces the existing one, or in the event that a new replacement health facility is required, that it is located as centrally as possible such that it has good sustainable access for all users including those who walk, cycle, or use mobility scooters." 8. Martlesham Parish Council would advise early and inclusive discussions about medical provision for the first residents of Brightwell Lakes, noting that the present Martlesham Heath Surgery is capable of expansion to meet future needs. Air Quality Control 9. MPC has 2 areas of concern (i) dust suppression during construction work, and (ii) air quality changes arising from the new road scheme and increased stop /start traffic etc leading to increased levels of NOx pollution and particulates. 10. We would welcome further detail concerning any proposed mitigation. We suggest the first issue could be addressed with the installation of specific construction dust measurement stations, ideally at Lancaster Drive being the closest residential point to the A12 and the site. The second issue might be addressed with the re-instatement of a diffusion tube to measure NOx levels in the Lancaster Drive area. One was put in at Lancaster Drive a few years ago but has been removed. 4/10 11. Given the huge amount of activity (traffic, industrial and housing) focussed on Martlesham, the cumulative effect of the many major infrastructure projects affecting the Parish, Martlesham should feature as an air quality measurement and management area in its own right. 12. We wish to encourage effective gathering of information regarding particulate levels. 13. MPC would welcome Planning Conditions which address: • A coordinated air quality monitoring and management system to be implemented before, during and post construction • Martlesham to feature as an air quality measurement and management area in its own right • Greater consideration given to applying the ESC Environmental Guidance Note and ESC Air Quality Strategyvi through Planning Conditions • An obligation to regularly consult and update Martlesham Parish Council on air quality measuring • The specific measurements are fed into the East Suffolk Council Air Quality Annual Status reports to measure trends, and • To make available to the public, information on the air quality target levels and

actual measurement levels of particulates in the area. Housing Mix and Tenure 14. Whilst we note the overall one third target for affordable housing^{vii} is achieved across the 4 applications, we would prefer a consistent percentage of delivery of affordable housing to be applied throughout the whole of the Brightwell Lakes project. This is for 2 reasons (i) to accommodate what is a constant level of demand for affordable housing, and (ii) to encourage social mixing and cohesion within each phase of the development, and as a whole. We would like to see a mechanism in place to preserve a stock of affordable housing over its 17 years build out period. 15. We express a deep concern that East Suffolk Council will not be applying the Government's First Homes Policy to this development^{viii}. 16. The opportunity to include provision for sheltered and extra -care housing has not been identified in this phasing. MPC would welcome further detail about exactly how this is to be factored in to later phases. 17. Due to the demand for downsizing within an ageing population^{ix} we would like to see smaller properties throughout the development delivering against a need as identified in paragraph 5.38 of the Local Plan: "overall there is a need for all sizes of property and that across all tenures there is a need for at least 40% to be 1 or 2 bedroom properties. Consultation feedback suggests a relatively high level of demand for smaller properties, particularly those to meet the needs of first time buyers or those looking to downsize. At present, around 30% of all properties in the plan area are 1 or 2 bedrooms, and therefore the need for 40% of new dwellings over the Plan period should not be underestimated. To ensure that smaller properties are delivered, and in particular recognising the issues around affordability and the potential demand for properties for downsizing due to the ageing population, a particular focus on smaller properties has been identified." 5/10 18. SCLP 5.9 states all developments with 100 or more dwellings, will be expected to provide a minimum of 5% self or custom build properties on site through the provision of serviced plots. The opportunity to include provision for self-build and/or custom build properties has not been identified in this phasing. MPC would welcome further detail about exactly how this is to be factored in during later phases. Building Design and Materials 19. We look forward to the Developer fulfilling its commitments: "When it comes to Brightwell Lakes, our ambition is to create a new community that has its own identity. Rather than a uniform design code there will be different character areas as you move through the development to create a sense of place. The open spaces, community buildings, and heritage assets will also help give the development several key points of reference. Three storeys will be the maximum storey height for phase one" 20. We welcome the design delivered through character bands, in particular the choice of materials used for the shared spaces with its block paving, narrow streets and speed bumps, all of which should delineate shared spaces, and which should reduce traffic speeding within the development. 21. The Developer has advised us in correspondence: "Taylor Wimpey Homes are built to beyond current Building Regulations standards in terms of their u-value performance (heat retention). As such the homes reduce heat loss and reduce energy demand on heating, which is better for customers and the environment. By choosing a 'fabric first approach' the homes' envelope is improved. In instances where Building Regulations dictates, [our emphasis] renewable technologies such as Photo Voltaics (PV) can be added to the roof to generate electricity during the day which can be used towards powering the home. In addition, 'Waste Water Heat Recovery' can be used which is a means of pre-heating water with the water going down the plughole" and "At present, the infrastructure supporting ground-source heat pumps is not developed enough to support the new community at Brightwell Lakes. We will look to use emerging, efficient technologies to support the electricity needs of future homes. Taylor Wimpey is however looking to exceed building regulation requirements and those of the outline permission when it comes to the energy efficiency of the homes" 22. We welcome every effort to exceed regular build standards. The Developer's above stated approach appears to solely deliver innovative design where Building Regulations dictates. We note the Developer offers what can be done, not necessarily what must be done. We note the Developer refers to future housing. This development is a significant contributor to the future of housing in

Martlesham. 23. We note East Suffolk Council has stated new build developments should consider construction standards that exceed the minimum Building Regulation requirements achieving sustainable BREEAM (Building Research Establishment's Environmental Assessment Method) and Passivhaus energy saving standards. 6/10 Broadband Provision 24. We note high-speed broadband provision (fibre to the properties) is not mentioned in these applications. We recommend this is incorporated as it is essential to modern life, home working and local internet-based enterprise. Parking 25. MPC would welcome further detail about how electrical charging points and evolving electric and hydrogen vehicle technologies are to be provided. These aspects were raised during the Developer's webinar, 7th July 2021, and assurances were given on behalf of the Developer that these technologies were being investigated and sustainable solutions being sought. 26. We note visitor parking spaces are located opposite houses. Anecdotal evidence from Martlesham Heath suggests single visitor spaces, as incorporated here throughout Phase 1, tend to be "adopted" by the nearest resident which causes friction amongst residents. It would be better to cluster visitor spaces. 27. MPC would like to see allocated courtyard parking designed to avoid leaving a natural play area in the middle, with the potential for children playing football in the midst of parked cars. We would like to see smaller clusters of car parking spaces and ideally, provision of safe, small, play areas so that children can play close to and within view of their house or apartment without causing a nuisance to vehicle owners. 28. We are concerned that hard-surfaced courtyard parking spaces can potentially create an acoustic problem where sound reverberates off the surrounding buildings and the car park surface. We would welcome further mitigation detail on noise dampening surface materials. 29. Experience within our Parish suggests there is an increasing need for people to be able to park commercial vehicles at home. We would therefore like to see consideration being given to providing some convenient communal space for such vehicles. It is unclear whether the courtyard parking facilitates van parking and caravan parking (if indeed this is permitted). With the Covid pandemic encouraging staycations, unauthorised caravan and boat parking could be an issue in future. 30. We note the lack of private driveways. This has the potential to exacerbate on-road parking and detract from the parking plans envisaged. 31. MPC would therefore welcome the following parking planning conditions:

- Where individual unallocated visitor spaces are provided, these should not be adjacent to individual houses, rather they should be in a separate cluster
- Where car ports are provided instead of garages, alternative storage provision should be no smaller than say 2/3rd of a single garage in size, appropriate to the size of house
- Courtyard parking spaces should be wide enough to discourage parking across two spaces
- More soft landscaping should be incorporated in the courtyard parking areas
- There should be some communal parking spaces to facilitate larger vehicles
- Incorporate vehicular charging points on street lighting columns, and
- Regulate parking through restrictive covenants for the benefit of all the residents.

7/10 Noise Mitigation 32. We note Outline Planning Condition 60 and paragraphs 5.33 – 5.42 of the Developer's Reserved Matters Planning Statement. We note that upgraded ventilation and glazing will be incorporated in the build design to make the dwellings fronting the A12 and Ipswich Road noise compliant, and that careful consideration has been given to internal room orientation and layout, and that the noise studies have been completed. 33. We ask that all noise should be tackled at source. Further, that the Developer's studies on noise take in to account future traffic noise from the A12. We draw attention to the Sizewell construction period of 20 years (a decision whether to proceed is expected by 14th April 2022), with its predicted additional movements of up to 1400 HGVs and LGVs along the A12xi, ambient noise from an occupied site, the increased noise from the construction of the site and noise from the speedway track to the south of site W1 (clearly visible on online satellite views). The speedway noise carries over a wide area and will be intolerable for residents living close by. The hours of use appear to be unregulated. Currently noise from the speedway track can be heard throughout the Parish. 34. MPC would welcome the following planning conditions:

- That any noise attenuation scheme takes in to account these additional

noise sources and contains a mechanism to mitigate any noise test failures • That the Local Planning Authority liaises with Suffolk County Council to take this opportunity to upgrade the A12 using quiet road surface technology to abate the road noise from current and future traffic affecting the site. This has been done recently with sections of the A14, and • Noise measurement at source to monitor the noise of the A12 and Ipswich Road throughout and beyond the Phase 1 construction period. Sustainable Transport 35. Outline Planning Condition 26 was imposed to ensure residents have storage for bicycles as an integral part of a sustainable transport system. We welcome the provision of secure cycle stores within most garages or gardens, in addition to communal cycle stores for the apartments. It is unclear whether the communal cycle storage and garden cycle stores will be sensor-activated lit facilities. 36. MPC would welcome the following planning conditions: • Provision of cycle and mobility scooter storage in a timely manner preferably before first occupation • Dropped kerb provision at major intersections to assist pedestrians, cyclists and mobility scooter users to cross roads • Wherever possible, physical separation of cyclists, scooter and pedestrian routes from vehicular traffic and from one another, and • Links to the wider cycle network should be comprehensive and in place prior to first occupation of the first phase delivered be it Phase W1 W1a E1or E1a. 8/10 Refuse Strategy 37. We would like to see communal recycling facilities provided as the development progresses. 38. In each of the Design Compliance Statements, the Developer provides a refuse strategy plan. It is unclear whether these plans constitute the entire refuse strategy. If so, these do not provide sufficient detail to assess the adequacy of the strategy. If not, we would welcome clarification which documents do comprise the full strategy. 39. We say this because there does not appear to be a refuse storage plan as required by Outline Planning Condition 25. A lack of an adequate, appropriate, dedicated, refuse storage space for the days between refuse collection, can easily and greatly detract from the predicted street scene. 40. MPC would welcome the following planning conditions: • Establish and name the documents comprising the refuse strategy • Ensure the refuse storage plan works for private dwellings • State how the Developer intends to reduce waste on site • Mark out 'wheelie bin storage' spaces to discourage bins being left in parking spaces and on the street, and • Ensure the collection and storage plans comply with the new Environment Act and the 2021 Waste Management Plan for England^{xiii}. Landscaping and ecology 41. In line with the current thinking on the preservation of dark skies^{xiv} and ESC Policy SCLP 10.4, we note the site is adjacent to the Area of Outstanding Natural Beauty and the River Deben Special Protection Area, Site of Special Scientific interest and RAMSAR sites, and we would welcome early sight of the development lighting plan. We invite the inclusion of the latest lighting technology for the courtyard lighting and street lighting to mitigate light pollution and to preserve the existing dark skies. 42. We note there will be a tree lined boulevard, said to provide a sense of enclosure with the help of density, scale and massing. ^{xv} Especially in the high-density areas of W1 and W1a behind the boulevard, more could be offered by way of landscaping. We question whether the current landscape plans will deliver the street scenes as depicted, front or rear. 43. We draw attention to Outline Planning Condition 12 which requires a planting schedule for private dwelling front, rear and unenclosed side gardens. We would welcome more native tree species being planted, including in gardens (provided they are appropriate to the size of garden and a suitable species). A variety of native, climate resilient, tree species will improve the back garden street scene and break up the courtyard parking scene. Back street scenes are important contributors to good design; they are equally important as the front street scenes, the estate entrance and boulevard design. 44. The Developer has advised us that "Beyond the home, Taylor Wimpey has a sustainability strategy for the introduction and safeguarding of wildlife which goes beyond Local Authority Requirements. Provision of increased numbers of Bat and Bird Boxes, Hedge Hog Highways (provision of holes in fences 9/10 to create a network of foraging routes) as well as a focus on biodiversity Net Gain amongst others" We welcome this ecological sustainability and wish early sight of the Developer's biodiversity strategy and climate change targets as mentioned by the

Developer in its presentation on Friday 15th October 2021. We wish to see the strategy being delivered in practice. We would also invite the inclusion of swift bricks in to the palette of build materials. 45. We note the phasing timings within Condition 9 of the Outline Planning Permission and request the Planning Authority monitors them. 46. MPC would welcome the following planning conditions: • The inclusion of a lighting policy befitting the special landscape character of the development • The inclusion of scattered orchards • Incorporating swift bricks • More tree planting, including those of a suitable species and appropriate to the size of garden, in more small planting spaces • More soft landscaping to improve the courtyard and back street scene, and • A full set of habitat conditions. Water Supplies 47. This is a water-scarce region. Therefore, we would like to know the strategy to preserve the water supply interests of current residents. We would like to draw attention to the fact that some residents and businesses within the Parish currently rely on ground water supplies from bore holes and wells. 48. We would welcome further detail of how it is proposed individual householders will collect and harvest their own water. Management of the community space 49. Ongoing management of the communal assets and space is important to the current community as well as the future community. Outline Planning Condition 20 requires the detail to be included in the Welcome Pack. We would welcome the detail of the management plans being made available at this Phase. The community spaces could be adopted by the Local Authority, or the Parish Council might consider doing so should the funding and conditions be agreed. Alternatively, a management company could be appointed, although residents would need the means and encouragement to take over the company. Conclusion 50. Thank you for taking our observations and recommendations into consideration. We trust they will be read in the spirit of constructive input with which they are intended. There is much to be welcomed in these proposals, and Martlesham Parish Council looks forward to working closely and collaboratively with the Developer and the Local Planning Authority.”

14 June 2022

“Martlesham Parish Council (MPC) Response: 1. MPC is generally pleased to see the latest revisions and amendments. The revision summary sent to us by email, and provision of large-scale plans, delivered to us at short notice, was helpful and appreciated. 2. MPC notes the comments submitted by SCC highways and would ask the Applicant to ensure these are addressed in detail. In particular, MPC is concerned to note the comments relating to cycle parking and storage. We would like cycle connections and routes to be clearly shown, indicating how they connect with the wider local cycle networks. 3. Furthermore, we note the holding objection of the Suffolk County Council Flooding Authority (SCCFA, 07 June 2022) re surface water drainage, and ask that the Applicant complies fully with national and local policy, guidance, and best practice. 4. MPC is pleased to see the internal dwelling layout revisions should go some way to address the A12 noise factor. In particular, we note paragraph 3.35 of the Cass Allan revised noise assessment, and external noise mitigation. We hope also to see ongoing air quality monitoring put in place to ensure the public open space will remain tranquil and protected. (Paragraph 3.41) 5. We would suggest that both parcels W1 and W1a have insufficient visitor car parking; there should be more parking capacity to avoid on- street parking and loss of amenity for future residents. 6. It is unclear to us where refuse bins will be stored for individual dwellings when not at the designated refuse collection points. Please could you refer us to a more detailed plan showing where householders are able to store two or three wheelie bins each, between collections. 7. We repeat our earlier request for on-site recycling facilities (MPC response, 22nd October 2021) in particular, we should like to see the provision of bottle banks. 8. MPC welcomes the revised environmental provisions now proposed; please can ESC ensure the fencing recommended in paragraph 3.43 of the noise report, facilitates the hedgehog tunnels proposed within the SES environment plan. 9. MPC is pleased to note the last set of revised Reserved Matters (DC/21/4004 and DC/21/4005) went straight to the ESC Planning Committee but understand this will not always be the case, which is

disappointing.”

6 July 2022

“Martlesham Parish Council has no comment.”

Consultee	Date consulted	Date reply received
Melton Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	9 September 2021 No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments:		
<u>9 September 2021</u> “Melton Parish Council Planning and Transport Committee considered this application at its meeting on 8 September 2021 and has no comments to make.”		

Consultee	Date consulted	Date reply received
Newbourne Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments:		
No response.		

Consultee	Date consulted	Date reply received
Police - Design Out Crime Officer	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments:		
No response.		

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	8 September 2021 13 September 2021 20 May 2022 4 July 2022	8 September 2021 14 September 2021 No response No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p><u>8 September 2021</u> “Thank you for consulting Network Rail regarding the above application. After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals. Should you have any further questions, please do not hesitate to contact Network rail.”</p> <p><u>14 September 2021</u> “Thank you for consulting Network Rail regarding the above application. After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals. Should you have any further questions, please do not hesitate to contact Network rail.”</p>		

Consultee	Date consulted	Date reply received
Rushmere St Andrew Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p>No response.</p>		

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response 23 May 2022 4 July 2022
<p>Summary of comments:</p> <p><u>23 May 2022</u> “I refer to the proposal: approval of reserved matters – the construction of 22 dwellings together with associated works, landscaping, and infrastructure for Brightwell Lakes (Phase W1a) – on DC/20/1234/VOC. Reason(s) for re-consultation: revised information provided by the applicant to the local planning authority. The outline planning application under reference DC/17/1435/OUT has an associated planning obligation dated 10 April 2018. The planning obligations previously secured under the first planning permission must be binding in respect of this application if East Suffolk Council make a resolution to approve. In respect of education, there are various obligations set out in Schedule 8 of the planning obligation including that the School Land must be transferred to the county council prior to occupation of the 100th dwelling. The county council (and the local</p>		

planning authority) will need to be satisfied that the proposed location of the school site is suitable. The NPPF in Chapter 12 highlights the importance of achieving well-designed places. I have no further comments to make in respect of this re-consultation, but I have copied to county council colleagues who deal with education, highways, and flood planning matters.”

4 July 2022

“I refer to the proposal: approval of reserved matters – the construction of 22 dwellings together with associated works, landscaping, and infrastructure for Brightwell Lakes (Phase W1a) – on DC/20/1234/VOC. Reason(s) for re-consultation: revised information provided by the applicant to the local planning authority. The county council previously responded by way of letters dated 11 October 2021 and 23 May 2022, which are still applicable. I have no further comments to make.”

Consultee	Date consulted	Date reply received
SCC Cycling Officer	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date 18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Flooding Authority	8 September 2021 13 September 2021 20 May 2022 4 July 2022	21 September 2021 No response 7 June 2022 6 July 2022

Summary of comments:

21 September 2021

“The submitted documents have been reviewed and we recommend a holding objection at this time. A holding objection is necessary because insufficient information has been provided to justify the proposed drainage strategy. It is noted that the submitted surface water drainage strategy list four appendices, including drawings, infiltration testing results, calculations and correspondence with Anglian Water. However, none of this information has been included in the submission. From the information that has been submitted, SCC would expect the applicant to provide justification (and if necessary, further supporting information) for any proposals that do not comply with CIRIA SuDS Manual design requirements, with specific reference to proposed water depths in the basin proposed for Phase E1, which also does not have 300mm freeboard, a 1.5m level bench at 600mm above invert etc. The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA’s formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.”

See Public Access for full response.

7 June 2022

"The following submitted documents have been reviewed and we recommend a holding objection at this time: Stantec, Phase W1 & W1A Surface Water SuDS Details, 10596/2011/113/P01, 10/03/2022 Stantec, Phases W1 / W1A Adoption Plan, 10596/2011/101/P01, 10/03/2022 Boyer, Coloured Layout W1A, PL-02-W1a-A, 09/03/2022 Boyer, Coloured Layout W1, PL-02-W1-A, 09/03/2022 Stantec, Phases W1 & W1A Surface Water Drainage Plan, 10596/2011/110/P01, 10/03/2022 Stantec, Technical Note, 332210596-2001-TN004, 10/03/2022 Stantec, Phases W1 & W1A Infiltration Rate Plan, 10596/2010/112, 10/03/2022 Stantec, Western Parcel Proposed Earthworks, 10596/2011/102, 10/03/2022 Stantec, Phases W1 / W1A Surface Water Catchment Plan, 10596/2011/111/P01, 10/03/2022 A holding objection is necessary because further information is required to demonstrate the proposed surface water drainage system complies with national and local policy, best practice and guidance. The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection. The points below detail the action required in order to overcome our current objection:- *It should be noted there are some areas on plans and in the technical note which still refer to Phase E1 & E1A. Principles 1. Assess the depth of proposed infiltration features against the depth of infiltration testing used for design purposes for that feature to ensure depth is consistent. If depth is not consistent then additional testing could be conditioned after earthworks with a view to demonstrating that the design rate has been met or exceeded. Any shortfall in infiltration rate would require minor design changes 2. Infiltration of surface water from residential properties is encouraged in areas of fill that do not exceed 1m. The infiltration structures/crates should be located entirely below the level of fill, in natural soils, with the invert not exceeding 2m depth 3. The proposed drainage strategy for the spine road will need to be agreed and consented prior to consent being issued for W1 as the drainage strategy for this parcel is reliant upon the strategic surface water infrastructure 4. The spine road drainage strategy will need to be demonstrated to account for the contributing impermeable areas from this phase, not only for water quantity, but also water quality 5. Some areas of cut are not utilising infiltration at source for property soakaways, what is the justification for this? Plans & Technical details 6. Provide a flood exceedance plan. Some details are given in the technical note, but further thought is required to determine any potential exceedance routes as this may impact future phases to the east 7. Apply climate change allowance of 45%, as per current national guidance 8. Are private drainage swale trenches proposed to look and function in the same manner as the highway bio-retention swales? If not, please provide further details 9. Permeable paving is proposed to be used in large areas. Are service corridors proposed? If not, does submitted modelling represent the reduced area available for infiltration due to the presence of services? 10. Clarify proposed ground levels. On Infiltration Rate Plan, SK13 proposed GL is stated as 27.25m AOD, compared to Existing GL 26.6m, yet this is shown on the earthworks plan to be in an area of cut 11. A brief assessment of freeboard for open attenuation structures is required. We would not request 300mm freeboard for such shallow structures, but some freeboard should be provided 12. Has allowance for urban creep been included? A plan detailing impermeable areas should be provided 13. How will surface water from the roads running north-south outfall into the bio-retention swales, specifically for catchments H1 & H2? Any traditional

drainage system with appropriate cover to pipe soffit will likely be deeper than the proposed bio-retention swale. Given these features are proposed for adoption by the Highway Authority, agreement must be reached with them on how this arrangement could be facilitated Pollution treatment 14. Provide details for bio-retention swale. What qualifies this as a bio-retention swale (eligible for higher treatment indices) rather than a regular swale? Are other features associated with best practice design of bioretention features incorporated, as per CIRIA SuDS Manual (engineered soil, surface level overflow to perforated pipe etc.)? 15. Clarify pollution indices for each road – some roads are unlikely to meet the threshold for ‘Medium pollution hazard level’ and could be assessed (with evidence) based on being a ‘Low pollution hazard level’. A single assessment has been undertaken for a worst-case pollution scenario, but as there are different treatment trains across the parcel this isn’t sufficient and each will need to be assessed individually, although similar groups can be assessed together Calculations 16. Calculations for permeable paving with filter trench do not represent what is proposed. Whilst the filter trench has been represented, infiltration across the entire base and side area has been modelled, this does not correspond with the detail provided which includes an impermeable membrane beneath the permeable paving due to proximity to dwellings. This approach will underestimate storage requirements. This should be modelled as a complex permeable pavement and filter trench structure. Adoption and maintenance 17. Details on adoption and maintenance should be altered to reflect latest arrangements, if this is not yet decided, this could be conditioned but an update would be appreciated in any case.”

6 July 2022

“We have reviewed the following submitted documents and we recommend approval of this application subject to conditions: 1. Stantec, Western Parcel Proposed Earthworks, 10596/2011/102/P02, 24/06/2022 2. Stantec, Phases W1 & W1A Surface Water Drainage Plan, 10596/2011/110/P02, 22/06/2022 3. Stantec, Phases W1 & W1a Surface Water Catchment Plan, 10596/2011/111/P02, 22/06/2022 4. Stantec, Phases W1 & W1a Surface Water SuDS Details, 10596/2011/113/P02, 22/06/2022 5. Stantec, Phases W1 & W1a, Flood Exceedance Plan, 10596/2011/114, 22/06/2022 6. Stantec, Technical Note Phases W1 & W1A, 332210596-2001-TN004A, 22/06/2022 7. Email from Sam Lonsdale dated 27/06/2022 @ 17:11 outlining peak discharge rates from W1 into spine network The below points should be noted for consideration as part of any future discharge of conditions application for this part of the development: 1. The SANG ARM application should be designed with 45% CC allowance. As part of the W1 and W1a DRC a 45% sensitivity test should be undertaken to determine any potential areas of flooding 2. Assessment of surface water treatment requires further consideration and supporting details to demonstrate compliance with CIRIA SuDS Manual. Specific concerns relate to the depth and specification of bioretention material 3. Treatment indices for PD 5 & 6 do not look to be correct and will need to be addressed 4. Details should be provided for attenuation feature overflows, for example, overflow chambers/standpipes to allow water to flow into the perforated pipe beneath in the event of surface blockage (due to lack of maintenance) 5. There should be sufficient upstream protection detailed prior to roof outfalls into perforated pipes beneath permeable paving to prevent a risk of blockage by moss/leaves/debris etc. Will the perforated pipe be inspectable (i.e. will it have a chamber at one or both ends)? Likewise, where connections are made beneath swales 6. It must be demonstrated that the discharge from W1 & W1a has been allowed for in the finalised spine network design 7. Actual rather than indicative design of property and driveway infiltration features must be undertaken 8. Agreement in principle from SCC Highways that a shallow conduit connection to bioretention features is acceptable 9. Table 8 of the Technical Note identifies a wide range between most levels of proposed infiltration and that of testing previously undertaken. Further infiltration testing will be required to confirm actual infiltration rates at the depth of proposed infiltration. DRC design should identify: 1. Location of

previous infiltration tests 2. Infiltration rate threshold used for design purposes for each sub-catchment. Note – sub-catchments should be based on proposed infiltration features and should consider both proximity of these features to one another and proposed depths 3. Number of future tests to be conducted in each sub-catchment, including depths Once the above has been established, a design can be agreed at DRC based on these assumptions. Future testing will need to identify actual infiltration rates. If better rates are achieved, the design will be conservative, if worse rates are achieved the design will need to be varied. It is therefore advised to use conservative assumptions for DRC design 10. Clarification of maintenance and adoption arrangements as it still states adoptable sewers will be adopted by Anglian Water 11. It's unclear why some calculations have not used the correct feature, for example crates being used to represent permeable paving and attenuation basin being used to represent swales 12. Play equipment has been located in the highway swales draining H2. This could lead to compaction of the surface and a reduction in infiltration potential. There should be clarification on this point which either details how compaction will be mitigated, with agreement of the proposed adoptee, or the play equipment moved 13. Water re-use options for the allotments should be explored and facilitated where possible *Please note that whilst these points identify obvious points of clarification, they should not be considered exhaustive and the LLFA should be contacted for clarification required on any additional aspects."

See Public Access for full response.

Consultee	Date consulted	Date reply received
SCC Highways Department	8 September 2021	3 November 2021
	13 September 2021	No response
	20 May 2022	31 May 2022
	4 July 2022	8 July 2022

Summary of comments:

3 November 2021

"Notice is hereby given that the County Council as Highway Authority cannot make a comment at this time due to a lack of information to make an informed decision. The Highway Authority would recommend a holding objection until the information has been submitted: No drainage has been agreed on this site we are still awaiting confirmation from the LLFA and Anglian Water. We are submitting a holding objection until the drainage has been resolved. Our comments may not lead to a refusal once any LLFA objections have been successfully resolved, However, they would affect any future adoption of this parcel by SCC as the highway Authority. We have only commented on plots and infrastructure inside the red line."

See Public Access for full response.

31 May 2022

"Summary: Clarification on visibility splays, cycle route through and connecting to site and parking spaces to 4 bed properties. Most other issues can be resolved via a recommended planning condition detailed design stage if a section 38 is entered into and accepted (if it meets criteria)."

See Public Access for full response.

8 July 2022

"Notwithstanding the surface water drainage features which are outside of this parcel and approval of such in another application may affect the adoption of the roads on this parcel and the

inclusion of play equipment in the surface water features that will be required to be relocated in order to be adopted by SCC. Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below...”

See Public Access for full response.

Consultee	Date consulted	Date reply received
Suffolk Police Designing Out Crime Officer	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response 26 April 2022 No response No response – <i>consultation end date</i> <i>18 July 2022</i>

Summary of comments:

26 April 2022

“On behalf of Suffolk Constabulary, I have viewed the available further plans and would like to register the following more detailed comments with regards to Section 17 of the Crime and Disorder Act. Comments have also previously been made for the general outline application, under reference DC/17/1435/Out, on the 23rd of April 2019. I have concerns regarding the parking, the majority of the parking allocated appears to be rear parking and the police do not recommend this, because time and again it is a generator for crime. The design is very porous with at least three pathways into the development and two vehicle access areas. A flying freehold is created at plot 17, which again is a real concern, as that type of structure, which again affords rear parking is also a crime generator. Suffolk Police have serious concerns regarding this development and in its current form could not support this application, as it would promote crime and the fear of crime through rear parking and opening up the rear of the majority of homes to be more susceptible to burglary. The development is on what is currently open land. It is a low crime area, however, with the addition of so much more housing, crime will doubtless rise within this area. Further details on local crime can be found at Para 4.0. The initial concerns from looking at the designs are; a) The majority of plots have been allocated rear parking. Rear parking is discouraged by police as these areas tend to have no surveillance and can place the fear of crime upon a vehicle owner during the winter months when these areas tend to be in darkness and it is a proven fact that more rear parked vehicles are broken into. The current design with the rear parking courtyards also opens up the rear of all but plots 1 and 19 to be more vulnerable to unlawful incursion. (SBD Homes 2019 (V2), page 22, para 16.3 refers). b) The layout for the area around plots 11-17 is a concern with rear parking allocated and access into the area through a flying freehold at plot 17. No parking plot is listed for plot 17, so it is presumed that the parking is garaged and incorporated within the plot. Flying freeholds are proven generators of crime, that include car crime, burglary, along with antisocial behaviour, drugs, criminal damage, graffiti and arson. It would be strongly preferred if these designs were removed. If they have to be designed in this manner, it is strongly recommended that security gates are fitted. It is also recommended photocell dusk to dawn lighting that meets BS5489:2020 lighting standards are placed on the side of buildings looking onto such areas to deter casual intrusions. The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice e, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site

and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines. (Suppliers of suitably accepted products can be obtained by visiting www.securedbydesign.com.)

2 c) The western side is a concern as it is a main corridor leading to other areas and any vegetation needs to be low lying and slow growing and the area needs to be well illuminated to make locals feel safe to use it. d) Vital intersection areas, where paths meet need to be well lit in accordance with BS5489:2020 to reassure users to feel safe to access these areas. (<https://www.securedbydesign.com/guidance/research-case-studies-guidance/lighting-against-crime/viewdocument/36> refers). (SBD Homes 2019 (V2), pages 16-17, paras 8.19-8.21 and pages 25-26, Paras 18.1-18.6 refer). e) Cycle storage areas should be designed in line with Secure By Design guidelines and have the use of ground anchors or a shed shackle (SBD Homes 2019 (V2), pages 68-69, Paras 56.1-57.3 refer). The role of a Design Out Crime Officer (DOCO) within Suffolk Police is to ensure that new developments are designed to minimise the opportunity for crime to occur which in the main is through the analysis method of Crime Prevention Through Environmental Design (CPTED) which is an analysis that is adopted for every proposed planning application no matter what the scheme. Further information on CPTED can be found at Crime prevention through environmental design - Wikipedia or Crime Prevention Through Environmental Design – Design For Security Which is backed up by further security principles through the national Police Secure By Design (SBD) methodology. Further information on Secure By Design can be found at Secured By Design Suffolk Police also provide an interpretation of the basic Principles of Secured by Design outlined in their “Residential Design Guide” at Design Guide New Format (suffolk.police.uk)

1.0 GENERAL INFORMATION

1.1 It is a documented fact that where parking spaces are either too far from respective properties or in short supply, such problems usually lead to antisocial behaviour, either from residents frustrated at not being able to park within their own living space, or from visitors, particularly any who may have parked there in the past and now find it difficult to do so. The resulting problems that such shortages produce include antisocial behaviour, either verbal or physical, along with criminal damage, graffiti and assault. There is a thesis by prominent college professor, Rachel Armitage, from the University of Huddersfield on parking and antisocial behaviour, for further details use the following link: https://live-cpop.ws.asu.edu/sites/default/files/problems/parking_garage_theft/PDFs/Car%20Parking_Crime_and_Anti_Social.pdf One of the main findings of this report stated, “Developments must have allocated car parking spaces for visitors and the design allocation of on street and communal parking must take care to avoid neighbour disputes”.

1.2 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.

1.3 The design should look at techniques and principles to assist with the orientation and navigation of the site, creating identifiable spaces to discourage and minimise the risk of crime and Anti-Social Behaviour through natural and informal surveillance.

1.4 In particular the detailed design should take account of the following principles:

- Access and movement: Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security.
- Structure: Places should be structured so that different uses do not cause conflict with no recesses, or obstacles for an offender to hide.
- Surveillance: In places where all publicly accessible spaces are overlooked CCTV should be co-ordinated within the lighting and landscape design. Lighting design should be co-ordinated with a CCTV installation and the landscape design to avoid any conflicts and to ensure that the lighting is sufficient to support a CCTV system.
- Lighting: Lighting should be designed to conform to BS 5489-1:2020 and light fittings should be protected where vulnerable to vandalism. The colour rendering qualities of all lamps should be to SBD standard of a minimum of at least 60Ra on the colour rendering index.
- Ownership: Places that promote a sense of ownership, respect, territorial

responsibility and community. • Physical protection: Places that include necessary, well-designed security features. 3 • Activity: Places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times. • Management and maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and the future, encouraging businesses and legitimate business users to feel a sense of ownership and responsibility for their surroundings can make an important contribution to community safety and crime prevention. Clarity in defining the use of space can help to achieve a feeling of wellbeing and limit opportunities for crime. 2.0 SECURE BY DESIGN (SBD) Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder. The role of a Design Out Crime Officer within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'. It would be good to see the development, or at least the Social Housing element built to Secured by Design SBD Homes 2019 accreditation. A further downloadable document can be obtained using the following link: https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_NEW_version_2.pdf

3.0 REFERRALS 3.1 Section 17 of the Crime and Disorder Act outlines the responsibilities placed on local authorities to prevent crime and disorder. 3.2 The National Planning Policy Framework work on planning policies and decisions to create safe and accessible environments, laid out in chapter 8, para 91b and chapter 12, para 127f, in that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. 3.3 The Suffolk Design Guide for Residential Areas- Shape of Development – (Design Principles Security) Looking at the careful design of a new development in regard to landscaping, planting and footpaths. 3.4 Department for Transport – Manual for Streets (Crime Prevention) The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. 4.0 CRIME STATISTICS FOR POST CODE AREA IP10 0BZ 4.1 The crime figures for this area have been obtained from the Suffolk Police Crime Computer base and the National Police Crime Mapper web. The Police Crime Mapper Web site is available for any member of the public using the following link: Felixstowe | Police.uk (www.police.uk) or Suffolk Observatory for Brantham at the following link: Suffolk - Overview - Ward | Martlesham & Purdis Farm | InstantAtlas Reports (suffolkobservatory.info) 4.2 The graph right indicates a breakdown of the offences committed around this area between August 2021 to January 2022, totalling 57 offences, the majority relating to Burglary and Theft offences which totalled 16 offences. Followed by Antisocial Behaviour totalling 13 offences. 5.0 FINAL CONCLUSION To reiterate, concerns around this development are: a) The majority of the parking allocated is rear parking and this sort of design is discouraged by police as these areas tend to have no surveillance and are more prone to crime, consisting of either vehicle crime, antisocial behaviour or residential burglaries. (Page 1, Para b refers) b) Plots 11-17 will have rear parking and access into the area through a flying freehold at plot 17. No parking plot is listed for plot 17, so it is presumed that the parking is garaged and incorporated within the plot. Flying freeholds are proven generators of crime, that include car crime, burglary, along with antisocial behaviour, drugs, criminal damage, graffiti and arson. (Page 1, Para b refers). 4 c) The western side is a concern as it is a main corridor leading to other areas and any vegetation needs to be low lying and slow growing and the area needs to be well illuminated to make locals feel safe to use it. (Page 2, Para c refers). d) Where paths meet they need to be well lit in accordance with BS5489:2020 to reassure users to feel to use them. Note bollard lighting is not recommended as it does not illuminate a person's face (Page 2, Para d refers). I would be pleased to work with the agent and/or the developer to ensure the proposed development incorporates preferred crime reduction elements. This is the most efficient way to proceed with residential developments and is a partnership approach to reduce the opportunity for crime and the fear of

crime.”

Consultee	Date consulted	Date reply received
SUSTRANS	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date 18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response No response No response – <i>consultation end date 18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	8 September 2021 13 September 2021 20 May 2022 4 July 2022	27 October 2021 - 8 June 2022 No response – <i>consultation end date 18 July 2022</i>
Summary of comments: <u>8 June 2022</u> “I have reviewed the soft landscaping plans submitted to support this application and can advise that they are considered to be acceptable.” <u>27 October 2021</u> “I have reviewed the submitted documents covering: Arboricultural Impact Assessment Arboricultural Method Statement Landscape Masterplan Landscape Details Plans Landscape and Schedule of quantities and can advise that they are all acceptable.”		

Consultee	Date consulted	Date reply received
Waldringfield Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	22 October 2021 - 16 June 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>

Summary of comments:

22 October 2021

“We would like to thank the officers from ESC and the representatives of the applicants for organising and attending the two virtual meetings held on October 15th. Both meetings were extremely helpful. Most of the issues we wish to raise apply to each/all of the applications listed above and this response is sent in respect of each of the 4 ARMs. Our comments are based primarily on assessing the information included in these applications against conditions in the Outline Planning Permission DC/17/1435/OUT. We have arranged our comments by topic. 1. Access The applications include statements that are ambiguous and in some cases contradictory, here are some examples: “The main access to the Site is from Ipswich Road located on the southeast. A further vehicular access is proposed from the Boulevard Spine Road which links to the main access via the proposed primary road.” (DCS Phase E1, §3.13). (Our emphasis). It is not clear from the above paragraph whether the reference to the “Site” relates to the entire Brightwell Lakes site or just the area of phase E1. Also it doesn’t specify if the access to Ipswich Rd is the East Ipswich Rd access or the West Ipswich Rd access. “The main vehicular route into Phase E1 is located on the south-east providing access to Ipswich Road and the wider highway network. A secondary access is to be created from the Spine Road ...” (Phase E1 Planning Statement, §3.3) (Our emphasis). In more recent discussions with the applicants we have been informed that “Once occupied, residents will only be able to access the site via the new A12 junction and the Eastern Ipswich Road access points.” (Our emphasis.) Is this the entire Brightwell Lakes site or just the area of phase E1? “Alongside new point of access which in the short term will provide a temporary exit route for construction traffic but over the lifetime of the development be converted into an emergency access point only.” (Phase E1 Planning Statement, §5.59) (Our emphasis). Subsequent discussions with the applicants indicated that the above paragraph is referring to West Ipswich Rd access but this is not clear from the statements in the ARMs. Is this to be seen as VOC of Condition 43, or is it an error? We would ask that the ARMs are amended to ensure that there is complete continuity and consistency across all the statements on the matter of the access routes within the ARMs in order to comply with outline planning consent conditions and avoid misunderstandings/confusion. The outline planning permission is clear that the primary access point is to be a new traffic signal controlled 3 way junction on the A12 between the existing Foxhall Road and BT roundabouts. Two secondary access points are proposed onto the Ipswich Rd. 2. Charging Points for Electric Vehicles The move towards electric vehicles (EVs) has accelerated considerably since the outline planning consent in 2018. The UK Government intends to pass legislation (which will come into law in 2022) which will mandate EV charging points on all new buildings: “We will publish our consultation response on requiring all new residential and non-residential buildings to have a charge point, and we intend to lay legislation later this year,” (Department for Transport Minister Rachel Maclean. <https://earth.org/uk-to-be-first-country-to-require-new-homes-to-have-built-in-ev-chargers/>) We are not planning lawyers but this would seem to override the now outdated planning condition 64. “Prior to the submission of the 1000th dwelling for layout reserved matters approval, an electric vehicle charging strategy shall be submitted” (Planning Condition 64). Even without the anticipated new legislation this planning

condition has been overtaken by the rapid development of technology and sales and is now in conflict with: "ESC Policy SCLP7.2. c) Proposals involving vehicle parking will be supported where they take opportunities to make efficient use of land and they include: c. Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles;" This is referred to in the both the E1 and W1 Planning Statements, §4.18. However, there is no mention in any of the four ARMs of charging points for electric vehicles, either attached to the houses or in the parking courtyards, or on the street. Given that all new cars sold from 2030 onwards are to be EVs, it is essential that all homes and all parking courtyards have EV charging points. If the charging strategy (let alone the actual charging points) is delayed until plans for 1,000 houses have been submitted, that will be far too late. What would happen to the plots that have already been built? Either they would be left without public charging points, or charging points would have to be retro-fitted, which would be disruptive and expensive. We appreciate there are complications with management companies and a rapidly changing technology, and that charging points are covered by building regulations rather than planning, but feel that a general statement of strategy from both ESC and the applicants would be helpful.

3. Street Lighting There is no mention of street lighting and the need to avoid light pollution. There are some welcome statements in the Environmental Action Plan, Appendix 6: CEMP Ecology Method Statements, Protection from lighting disturbance, but this is solely about the construction phase (CEMP = Construction Environmental Management Plan). Following subsequent discussions with the applicants we understand that the details of the external lighting will now be submitted as an addition to the ARMs to comply with condition 61: "As part of each layout reserved matters application, details of external lighting to be installed ... shall be submitted to and approved" (Planning Condition 61) We would ask that consultees are given the opportunity to comment on these later submissions.

4. Construction Phases Apart from the ecological constraints described in the CEMP, there doesn't seem to be anything about how the construction phases will work. How will the building materials, lorries, diggers, etc. access the site? What volume of construction traffic is predicted along the Ipswich Rd for the two main phases (E1 and W1)? Is the A12 access to be used for construction traffic? We appreciate that prior to any development taking place a Construction Method/Management Statement will be submitted for approval (Planning Condition 18), however it would be useful to have answers to these questions this stage, as they will have a profound impact on the traffic on the Ipswich Road and therefore on the residents of Waldringfield. We would like assurance that the public footpaths running along the south sides of both sites, E1 and W1 will remain open during construction.

5. Car Parking Since the tertiary roads within the phases are so narrow, it is essential that sufficient off-street and on-street parking laybys are provided, to prevent parking in the roadside, potentially blocking the road. We would ask for the parking provision to be broken down and shown by ARM areas rather than for the whole site. The off-street parking courts in the private parking areas appear to be isolated from the dwellings they are serving, and in many cases these areas are bordered by garden fences/hedges etc and so are not overlooked by the residents of the dwellings. We are concerned that, because of this layout, getting from the parking bay to the front door could be intimidating and possibly dangerous at night, particularly for women. We would wish to see the detailed lighting plan for these areas included in the plans to be submitted under item 3 above.

6. Energy Efficiency There appears to be no mention of the energy efficiency of the houses. Given that the Government is legally obliged to reduce the UK's greenhouse gas emissions by 68% by 2030, and that housing contributes 18% of the UK's emissions, it is essential that all new homes are built to the highest possible standards of energy efficiency. Will the houses have loft insulation? Cavity wall insulation? Double or even triple glazing? Solar PV panels? Heat pumps?

7. Phasing and Timing Although a phasing map is provided, there are no accompanying dates or even approximate timings. Some timings have been provided elsewhere, for example in the slides which were presented to the Brightwell Lakes Community Forum in June 2021, but without this information in the ARMs it is

difficult to get a clear picture of how these four phases fit in to the bigger picture. We ask to be provided, as part of the ARMs, a timing sequence of the start and completion dates of: • Ipswich Rd access West • Ipswich Rd access East • A12 junction • 'Spine' road (boulevard) • Phases W1, W1a, E1 & E1a • SANG (various areas) 8. Previously submitted but undetermined ARMs We understand from subsequent discussions with the applicant and ESC that the applicants are currently reviewing/amending the two extant ARMs DC/18/2774/ARM (infrastructure) and DC/18/2775/ARM (SANG), and that these revisions will shortly be submitted to ESC. We ask to be notified and invited to comment on the changes. 9. Phase E1a The Phase E1 Landscape Masterplan (JBA18/163-SK02) clearly shows the E1a area covering 9 houses, whereas all the other plans show E1a covering a much smaller area of just 3 houses. We have learnt in subsequent discussions that E1a will now consist of just 3 show houses. 10. Landscaping & Arboriculture WPC's Tree Warden has submitted comments on the landscaping and arboriculture aspects separately, and WPC fully endorses these."

22 October 2021

"Waldringfield tree warden's comments on the submission for Brightwell Lakes Phases E1, W1, E1a and W1b 1 Overall concept The phases here detailed are residential developments, the first four areas of the several required to complete the site. The layout of these is necessarily quite tight incorporating houses and flats, garages and parking spaces, cycle storage, footpaths and roads. There are few opportunities left for landscape planting of trees, hedges, shrubs and herbaceous material, and grasses. However where these exist they have not been used to their full advantage. 2 Wildlife corridors Although mention has been made of wildlife corridors in past documents these now seem to consist almost entirely of the peripheral bridleways which are already in existence for the main part and the necessary open spaces or SANGs including the main one around the lake not yet fully designed. There is no attempt to take the wildlife corridor into the housing development where it might link up with gardens. In these layouts gardens do not back onto open areas but very largely onto other gardens meaning they are surrounded by tall (1.8m) grey closeboard fencing. The back gardens are turfed. There are no trees or climbers in the gardens whatsoever native or otherwise (see condition 12). 3 Proposed Trees Proposed trees are spaced 15m apart along both sides of main access roads. Trees within the development are a mere sprinkle. There are no groups of trees of different sizes and species. There are many dwellings within the development where there will not be a single tree visible from a window until residents (hopefully) start to plant them. 4 Tree canopy on maturity On the planting plan all proposed trees of whatever species or initial planting size are shown as circles of diameter 5m. It is not known at what stage of their development they are meant to be illustrated. However many are very narrowly fastigate trees. These are suited to restricted spaces such as city courtyards. There is a lot of the upright growing field maple *Acer campestre* Streetwise. This is predicted to reach a diameter of 3m after 25 years (using data from Hillier Nurseries). *Carpinus betulus* Franz Fontaine will reach 2.5 crown diameter, ornamental cherry *Prunus Amanogawa* only 1m wide after 25 years. Fastigate birch may make 1.5m wide spread and *Pyrus Chanticleer* (ornamental pear) 3m. Therefore all of these will be much narrower columns than shown on plan. Only *Acer Elsrijk* may reach 6m after 25 years and *Liquidambar* is predicted to reach 5m diameter. The others would be much smaller than the circles shown on the plans, half as big or less in some cases. These severely upright trees cast less shade, and are mostly without the contrast of more spreading forms as shown on the optimistic illustrative sections. They will not provide much leafy mass to complement the buildings. The exception Silver Birch is a native tree but shortlived. It has a limited lifespan of 60-80 years. There are very few shown although these are very good for wildlife supporting many insect species. 5 Species of trees selected The cultivar of Field Maple Streetwise is a clone. Therefore although providing food for wildlife in the seeds and leaves they are identical genetically which would mean a disaster if a disease struck. All the cultivars are genetically identical so similarly the cultivars of

Hornbeam would be identical with each other. Among the tree species represented there are no oak, which is the main forest tree in this area in the woods bordering the larger overall site to the north and west. There is no hazel, no willow, no holly and in fact there are no native shrubs whatsoever. It seems that the wildlife travelling through will not find much sustenance. There are no pines to tie in visually with the existing tree belt of Austrian Pine, with one exception.

6 Survival of trees This area has had severe droughts in the past few summers and these very tall rootballed specimen trees are going to need plenty of watering. Generally, smaller trees survive better. No watering system is specified. Either an underground fitted irrigation system or a water bag to deliver water over a period may be necessary to combat drought and see the survival of these trees. Examples exist nearby of tall specimen trees planted and subsequently dying in numbers (e.g. Silver Birch at BT Adastral Park) Liquidambar is a fine tree from North America. It prefers a well drained but moist soil.

7 Shrubs: maintenance All ornamental, these are planted in 1m wide bands around the housing. They are maintained by the contractor in the first year. After this there is no management plan that we know of so far. Do the residents clip them? There are topiary yews and bay in pairs at several of the entrances. Are these maintained by the resident or visiting contractors? This seems rather a quirky idea. If contractor, they may end up like the planting at nearby Martlesham Heath Retail Park which is all cut by hedge trimmer to the same height, often removing flowers and berries. Most of these shrubs will outgrow their position if not carefully maintained.

8 Use of poisonous shrubs There are quite a lot of varieties of spindle (*Euonymus*) in the planting which is close to footpaths and house frontages. The native spindle is highly poisonous in all parts. These foreign relatives of it are also marked as injurious, may cause skin irritation. It is used very widely throughout the site in many cases close to where pedestrians will walk and ultimately the residents may decide to cut these themselves and would have to handle the foliage.

9 Non-native shrubs The Taylor Wimpey Environmental Strategy states that 'all new sites (will) have planting that provides for local species throughout the seasons'. None of the many thousands of shrubs or hedges is a native species. While many have flowers and berries which may support our wildlife – *Choisya* and *Hebe* for example are good for bees when in flower – generally they are planted for their decorative foliage and do not provide 'food and shelter' for wildlife throughout the site. While not expecting a design with entirely British wild plants it is as though these have been excluded entirely.

10 Basin (in E1) This damp area receiving drainage from the swales is to be sown with a wetland wildflower and grass mix. It could be enhanced by adding a few groups of shrubby willows, dogwood and/or alder. This would increase its wildlife potential greatly.

11 Swales These are part of the Suds system and could provide useful habitat if they are maintained with the longer grass and flowers cut on a less frequent programme as described. The swales, about 8m long, are meant to be surrounded by shorter grass it would appear. I have not found a section drawing showing the depth and slopes of the swales.

12 Private gardens These are to be turfed and surrounded by fencing with no further planting.

13 Suggestions for greening the site A number of fairly easy things could be done to improve the appearance and wildlife potential of the new residential areas:

13.1 Residents with gardens could be offered a choice of small trees to plant in their gardens, such as Rowan, Crab Apple, Cherry Plum or varieties of domestic apple which would attract birds and bees into their gardens at the very least and soften the overall effect of the stark closeboard fencing.

13.2 Residents could also be offered a climber to go on their fence with a trellis attached for them (less work than clipping topiary) such as a climbing rose, clematis or honeysuckle, or an ornamental ivy, which they could select from. These would all provide nesting sites and soften the appearance of so many fences.

13.3 Street trees which are 15m apart could be at least doubled in number and do not have to be entirely fastigate. The narrow forms suit tight spaces, they are not necessary where the trees have plenty of space all around them. Whitebeam, Rowan, Crab apple, Wild Pear and larger growing trees such as Wild Cherry, Small Leafed Lime, Oak and Scots Pine could be placed where space permits.

13.4 Native hedges could be incorporated in some areas including fruiting plants for wildlife such as hawthorn, elderberry, dogrose, cherry

plum, dogwood, holly, which all grow in the area. 14 In conclusion The plans are disappointing on a number of fronts. Wildlife and nature seem to have been far from the minds of whoever drew up the plans. The canopy effect will be very sparse even if all the trees grow to maturity. There is no relationship between the coastal location in Suffolk, with low rainfall and extremely sharp drainage, and the proposed vegetation on site. These proposals could just as easily be in any county in England. There are very few native species included.”

16 June 2022

“Waldringfield Parish Council met to discuss these applications and decided that it wished to make no additional comments to those previously submitted.”

Consultee	Date consulted	Date reply received
Woodbridge Town Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	7 October 2021 - 8 June 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>

Summary of comments:

6 October 2021

“In July 2017 Woodbridge Town Council recommended refusal of application DC/17/1435/OUT due to concerns about the suitability of the site for development and the likely negative impact to the already congested A12 at Martlesham which is the primary access route for Woodbridge residents and visitors travelling to and from the south and west. Four years on, with extensive further retail and commercial development east of the A12 north of this development at Martlesham Heath Business and Retail Park, we have reviewed that position in the light of the four applications DC/21/4002-4005/ARM. Woodbridge Town Council consider that the mitigation proposals contained within the applications for managing and minimising traffic flows to and from, as well as within this development are inadequate both in terms of extent and timetabled implementation strategy during the stages of development of the land south and east of Adastral Park. Our concerns are exacerbated by the expected increase in traffic movements on the A12, up to around 2036, as published by the Applicant for Sizewell C at the for Sizewell C DCO Examination. Woodbridge Town Council ask that, if ESC is minded to approve the applications, ESC require prior to approval further details on how the Applicant will encourage non-vehicular and public transport movements of residents between the development and the retail/commercial facilities at Martlesham Heath Business and Retail Park. We consider the Applicant proposals do not currently positively encourage walking and cycling and there is no provision for direct off A12 bus services to the facilities. We consider the application requires as a minimum a detailed strategy for mitigation against a potential increase in short distance car journeys to retail and commercial facilities Woodbridge Town Council are deeply concerned by the lack of detail in the application on the above and other aspects, notably drainage as highlighted by Suffolk County Council. The Committee echoes the comments of Kirton and Falkenham Parish Council. The Climate and Ecological Emergency Committee have commented to the Planning Committee that they have the following ecological and environmental concern alongside the matter of sustainable transport strategy as mentioned above; - We would ask that if ESC is minded to approve the applications a condition is included to extend the period until the end of July for which protection is provided to nesting birds in the development areas, - We further recommend, if ESC is minded to approve the applications, that a condition is added that no artificial interference to nesting birds such as the

pre netting of trees and hedgerows would be permitted on the development areas. In general, we are deeply concerned by the lack of detail in the application and therefore, with all of the above considered, recommend REFUSAL of this application.”

8 June 2022

“The Committee agreed to make NO comment.”

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	2 December 2021 20 May 2022 4 July 2022	2 December 2021 No response No response – <i>consultation end date</i> <i>18 July 2022</i>

Summary of comments:

2 December 2021

“Archaeological work has been secured on the site through conditions on the outline consent (DC/17/1435/OUT), and a mitigation strategy. We therefore do not have particular comments on the reserved matters applications for the areas in question save that work is undertaken in accordance with the strategy/conditions. However, we would echo the comments provided by Historic England in response the consultation, regarding consideration/safeguarding of designated and non-designated heritage assets through the CMP etc.”

5. Publicity

5.1. The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Archaeological Site	16 September 2021	7 October 2021	East Anglian Daily Times

6. Site notices

6.1. The application has been the subject of the following site notice:

General Site Notice	Reason for site notice: May Affect Archaeological Site Major Application Date posted: 20 September 2021 Expiry date: 11 October 2021
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7. Planning policy

7.1. National Planning Policy Framework (NPPF).

7.2. The development plan comprises the East Suffolk Council – Suffolk Coastal Local Plan (adopted on 23 September 2020) (“local plan”) and any adopted neighbourhood plans. The relevant policies of the development plan and supplementary planning documents are listed in the section below and will be considered in the assessment to follow.

- SCLP5.8 - Housing Mix (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP5.10 - Affordable Housing on Residential Developments (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP7.1 - Sustainable Transport (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP7.2 - Parking Proposals and Standards (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP8.2 - Open Space (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP9.2 - Sustainable Construction (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP9.5 - Flood Risk (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP9.6 - Sustainable Drainage Systems (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP9.7 - Holistic Water Management (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP10.1 - Biodiversity and Geodiversity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP10.2 - Visitor Management of European Sites (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP10.3 - Environmental Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP10.4 - Landscape Character (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP11.1 - Design Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP11.2 - Residential Amenity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

- SCLP11.3 - Historic Environment (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- SCLP11.7 - Archaeology (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)
- The Historic Environment Supplementary Planning Document (2021)
- Sustainable Construction Supplementary Planning Document (2022)
- Affordable Housing Supplementary Planning Document (2022)

8. Planning considerations

Principle of development

- 8.1. The principle of development has been established via the hybrid planning permission, which approved in part the construction of *'for up to 2000 dwellings, an employment area of 0.6ha (use class B1) primary local centre comprising use class A1, A2, A3, A4, A5, B1, C3, 02) secondary centre (comprising possible use classes A1, A3 and A4), a school, green infrastructure (including Suitable Accessible Natural Green space (SANGs) outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure.'*
- 8.2. The outline planning permission set parameters for how the development should be achieved, which included:
- up to 2000 dwellings;
 - an employment area of c. 0.6ha (use Class B1);
 - a primary local centre (comprising use Classes A1, A2, A3, A4, A5, B1, C3, D1 and D2);
 - a secondary centre (comprising possible use Classes A1, A3 and A4);
 - a school;
 - green infrastructure (including Suitable Accessible Natural Greenspace (SANGs), outdoor play areas, sports ground and allotments/community orchards);
 - public footpaths and cycleways;
 - vehicle accesses; and,
 - associated infrastructure.
- 8.3. This reserved matters submissions should build upon these established principles, as well as the approved plans and documents of the outline permission, to shape the detail and form of development within this specific parcel.

Design: appearance, landscaping, layout, and scale – with reference to Condition 8 (character banding); Condition 23 (materials); Condition 24 (boundary treatment); Condition 61 (external lighting)

- 8.4. The outline planning permission establishes the building heights for entire Brightwell Lakes scheme, under the approved drawing 'Environmental Statement - Parameter Plan 2: Building Heights' (Dwg: 31677 03 Rev. F), which has regard to the impact of development

on the nearby existing development, public rights of way, the Suffolk Coast Area of Outstanding Natural Beauty (AONB), surrounding landscape character and visual receptors.

- 8.5. In response to these parameters, the submitted Building Heights Parameter Plan denotes the majority of the dwellings within Phase W1a will be 2 and 3 storey in height, building heights will range from 2 and 3 storey buildings, with the 3 storey buildings located along the Central Boulevard Spine Road and the western edge to provide visible frontage above the noise attenuation landscape. Phase W1a will provide a variety of house types to suit local architectural character and housing needs, ranging from 1 bed flats to detached 4 bed homes. The 22 units in Phase W1a will all be market housing with affordable provision being provided within the rest of Phase W1 and the rest of the site.
- 8.6. The principles of site-wide development densities were approved by a density parameter plan. Phase W1a will provide a density of 47 dwellings per hectare, with higher densities located along the frontage to provide a sense of enclosure, scale and massing and the lower densities provided within the adjacent parts of Phase W1, in accordance with the approved density parameter plan.
- 8.7. The approved Design and Access Statement and Character Banding Plan, provides guidelines for overall design ethos of each character area. The Phase W1a site is bound to the north by the Boulevard Spine Road, which defines 'The Boulevard' character area. Buildings within this character area will adopt a contemporary appearance, constructed using smoked red multi brick as the main wall material, offset by grey contrasting brick, boarding and tiles. Roof forms will be mainly gabled including sawtooth gables to create interest and vertical focus within the street scene. There are no further character areas covering Phase W1a, however the proposals include subtle material changes to the southern parts of the phase. These materials will have more traditional texture and character.
- 8.8. East Suffolk Council's Principal Design and Conservation Officer has reviewed the submission and initially advised the following on the originally submission (received 28 October 2021):

Layout – frontage to A12

The area of development submitted here that will form the first phase of development at Brightwell Lakes has a relatively short section of frontage to the A12, only. It will eventually form the terminus to the extensive frontage where the larger development will present itself, as it were, with its public face to the A12. It will need to appear integral to the overall frontage and, thereby, what is here proposed will provide the precedent for what follows on across the rest of the A12 frontage to the north. As well as acting as the terminus frontage section, this layout will have to address the entrance to the development where its spine road-boulevard connects to the A12. The frontage layout here, therefore, has some key urban design roles to perform; addressing the A12; addressing the entrance; and providing the frontage terminus (it could also be called the frontage commencement).

In reviewing the design of the A12 frontage, I consider the layout reasonably successful for these reasons:

- *It effectively provides continuous built frontage. In this way, the built form will have street presence. This is critical in providing a strong edge to the overall development that addresses the A12, a dynamic space. We have always been clear from early days that we did not want a frontage which retreated from the A12 or was buffered by acres of green space. For a development to have truly urban qualities, these can only be imparted by built form, not trees.*
- *Its position. The frontage here gets as close as it reasonably can to the front edge of the development site, taking account of the proposed bunding, acoustic barrier and footpath. This positioning aids the outcome I describe above and is welcome. There could easily have been a deeper setback shown here to accommodate a tree buffer, frontage access road and frontage parking but this is correctly avoided here.*
- *The provision of active frontage. The layout indicates that all but one dwelling will have front door access off a shared footpath. Ordinarily, this provision would activate the street to which the frontage block is attached, but, in this case, the 'street' is the A12 and is physically separated. Nonetheless, the frontage space within the development site is, itself, a key space providing important connectivity, and the active frontage designed here is appropriate and welcome.*
- *The layout here provides for an attractive aspect for occupiers onto greensward, tree planting and the naturalised bund.*
- *The layout acknowledges the importance of the south-western corner of the development where, here, the frontage dwelling turns the corner by facing south.*
- *I am not overly keen on stepped building form on plan. I prefer the building line to be at the same orientation as the street/path/space which it addresses and edges, so that they clearly relate to one another. It also allows for the overall building form to be contained within a single architectural plane, which can strengthen its presence and effect of continuity. Historic urban development never really consisted of stepped forms, and I am uncertain why it is included here. However, it will provide modelling across the frontage and a kind of pattern or rhythm, to which I do not object.*

In layout terms, therefore, the A12 frontage is reasonably successful in providing the basis for meeting the key urban design roles that I have set out above. The overall success of this frontage will also depend upon its density, form and massing, and architectural quality, which I address below.

Layout – frontage to boulevard

The spine road-boulevard has always been identified by us for its key role in forming an entrance to the development; providing the key organising route and one of its key spaces; the importance of its urban character; and the opportunity it provides for the buildings that will line it, in terms of their architectural quality and interest.

With respect to the boulevard frontage, I judge that the submitted layout is very successful in addressing key urban design opportunities and that is for the following reasons:

- *It provides continuous built frontage. The spine road is a relatively wide thoroughfare and needs enclosure on both sides to form a coherent urban space. The layout provides*

this well. The few gaps in the frontage that are shown provide access routes and amenity space.

- *Forward position of the building line. This also is critical in providing spatial containment to the spine road by reducing its proportion and width. This is achieved here by avoiding frontage vehicle access and deep front gardens.*
- *Layering of spatial uses. To animate and add interest to the spine route, the layout provides a form of spatial layering which, although not original, works well enough here: the road is edged with a green space that contains boulevard tree planting; this forms the edge to the continuous frontage footpath which, itself, is edged by the semi-private space to the front-facing dwellings that provides their access. Each of these layers, therefore, provides contrasting uses which, collectively, add static and dynamic interest to the layout in this part of it.*
- *Active frontages. It is a well understood consideration that front doors onto key public spaces (like the spine road) avoid sterilising these spaces by ensuring that the comings and goings of occupiers take place as part of the social life of these spaces (with multiple other benefits). I am pleased to note that the layout is very careful in providing these engaged frontages – even where apartment blocks are shown. Where there are none – the flats over garages – these are restricted to four in number and are well separated across the length of the layout.*
- *The continuous building line. I support the alignment of the building frontage with that of the spine road. It is important the orientation of the spine road defines that of the buildings that enclose it, and this is what is shown here. I note also that the building line is continuous, such that the individual positions of the frontage 4 buildings are closely related to each other and change only where the road alignment changes. This effect will add strongly to the effect of the continuous built frontage, referred to above.*
- *Responding to the layout opposite. Of importance is that the frontage layout acknowledges and responds to the outline layout of the frontage opposite to the north. This is in respect to the position of the local service centre and also where the secondary access roads will join the spine road. At these road junctions, the view across to the submitted layout ensures that built form always closes the vista. The local service centre has a pedestrian link provided opposite that runs through the frontage into the layout behind.*
- *Varied housetypes and built form. I like that the spine road frontage consists of a variety of building types: townhouses, apartment blocks and flats-over-garages (although I have reservations about this building type). This should ensure a varied streetscene, varied building form and changes in scale. In these differing ways, the streetscene will be animated, rather than monolithic. I don't think we ever anticipated to see, or ever wanted, a kind of uniform streetscene consisting of a uniform typology. Brightwell Lakes is an urban extension and not a planned new town designed to have setpiece urban architecture. However, we do want to ensure that the frontage treatment here signals that this part of the development is different to what lies behind it, and the attributes that I describe above explain how this is achieved.*

In layout terms, therefore, the spine road-boulevard frontage is successful in meeting our key urban design expectations of it and I have no concerns about it.

Rest of layout

With respect to the rest of the layout, I recall that at outline stage, we were content that designers were provided freedom to create a scheme to reflect development requirements, client brief and, hopefully, some imagination thrown in, for those areas of the outline layout that were not tagged as 'character bands'. This would avoid the need for onerous and prescriptive design coding.

I would say that the design of the rest of the layout here justifies this approach and our confidence in designers providing an acceptable quality of design without needing to be told how to achieve that (by us). This is not a surprise to me, given my many years of working with major housebuilders and their designers: whatever one thinks of their housetypes, I have always found them generally capable of providing good quality decent layouts. Layouts are what they do all the time, after all.

The size, shape and proportion of this development parcel lends itself well to the use of the conventional perimeter block layout, with outward facing development creating a straightforward division of the parcel into orthogonal blocks and resulting streets. This parcel was never earmarked for any particular treatment in terms of its layout or position – compared with the heritage park to the north of this parcel – and there is no expectation for the creation of, for example squares, crescents or pocket parks. This is because the parcel is too small to create such urban layout effects, and also because this parcel lies close to the 5 southern countryside edge of the outline development. There is no need, therefore, to provide green open space within it.

The perimeter blocks are of varying sizes which should provide a pleasing variety of layout effect. Those that include apartment blocks have rear parking courts. These have the benefit of displacing parking off the street and off any frontage positions. The courts are generously proportioned on plan and will be well overlooked by definition by the apartment blocks. All other blocks have back-to-back gardens which is a conventional approach that works well.

Perimeter blocks have the advantage of providing outward-facing and active edges and, when combined together, produce conventional streets. Where some are used, as here, without rear parking courts, the effect is to increase the extent of roads to permit access to all edges of the block. This can appear on plan, therefore, as a road-dominated layout. However, the effect here is to use some of the access roads as shared space and this helps mitigate the impact.

On these bases, therefore, I judge that the design of the rest of the plan layout is acceptable.

Density

There is a very clear approach here to density in respect of layout that I judge works well and is straightforward. This is that layout density is higher along the key frontages to the A12 and the spine road-boulevard; and lower behind those frontages. Thus, there is a differentiation in density between key frontages and what sits behind them. There is no variation in density in these rest-of-layout areas. I would not expect there to be and I have

long ago given up on the notion that we can persuade layout designers to have the lowest density along countryside edges. This idea simply doesn't work with housebuilders as it has no real meaning to them – indeed, what would it mean to us? Bigger gaps between houses? These kinds of layouts just do not work in that way.

This parcel is too small to achieve varied density across it and there is no differentiation in layout character which requires it – other than the frontages and what sits behind them. I think what we will need to be careful of, however, is avoiding a uniformity of density (behind frontages) across neighbouring parcels and their neighbouring parcels. Future applications will need to retrospectively consider this key issue in a masterplanning manner to take account of the importance of avoiding monotonous, repetitive and unvaried density, where everything everywhere has the same feel. It may be somewhat less of an issue at Brightwell Lakes, as we have identified a lot of key frontages – what we have termed character bands – but that still leaves a lot of unquantified rest-of-layout.

Form

What goes for density tends also to go for form. Density relates to the form of the layout in the manner in which development is laid out. Different forms of development will call on different densities to signify key urban design elements: the boulevard, the circus, the crescent, the park edge, the urban centre – and so on. There are no such urban signifiers here, beyond the identified frontages and this is fine. This parcel is not required to do anything else. It does not really have a countryside edge and its form does not change along the southern edge of the parcel. The more interesting development forms lie elsewhere on the masterplan: the heritage park, view to Adastral Park, the SANG, and the main service centre with school.

Massing

With respect to massing, the streetscenes helpfully illustrate the approach taken and I welcome their provision and that they are sufficient to illustrate this key urban design aspect, in addition to showing character (although provision of internal streetscenes would have been beneficial). These should be read together with the submitted Storey Height plan. I would say that the massing approach does work well across the layout and reflects the variation in density behind the key frontages and the rest of the layout, including the southern edge. The predominantly 2.5/3-storey scale of the buildings fronting the spine-road boulevard and the A12 is appropriate, particularly when closely spaced, and provides the effect that we had in mind along these key routes.

The detailed massing of the spine road frontage shows that the secondary accesses are signalled by really quite emphatic corner-turning apartment blocks, and I judge that this approach works very well (and architecturally, also). This device is also employed to good effect opposite the local service centre, with the pedestrian access from within the layout to it between. This works well because it shows this side of the street responding to what is (will be) on the opposite side, and this will help emphasise this area as a service node.

The intermediate massing and scale of buildings along this frontage is varied between 3-storey townhouses, 3 and 2.5 storey apartments, and 2 storey flats-over-garages with varied spacing between. I have no concerns about this approach which will provide a varied and somewhat informal streetscene where the language of materials unites the designs. The applicant had made it clear from the outset that we were never going to get continuous uniform frontages of 3-storey townhouses – mainly because this housetype is

not locally in demand. This is the reality we must engage when considering the approach taken here and we must look for the merits in what is provided.

Massing to the A12 frontage works well enough in respect of the use of three-storey townhouses. These will provide an attractive rhythm and have street presence when seen above the acoustic bund and fencing – a key outcome of the masterplan and welcome for it. I do just wonder why this frontage was not strengthened with the continuous use of the townhouses across its entire length. I feel that the massing approach is undermined by the use of a 2-storey dwelling (Plot 6) immediately next to the townhouse (Plot 7) that turns the corner onto the spine-road frontage. This massing device appears to weaken this key corner and its effect is questionable. Plot 1 is also 2-storey but does not concern me, as it is detached from this frontage and successfully turns the corner into the lower density southern edge.

Please see Section below (landmarking) on further concerns about the treatment of this key corner.

Massing in the remainder of the layout provides a contrasting approach to the frontages by the uniform use of 2-storey buildings with greater spacing between. This reflects the plan layout of lower density and is appropriate.

Street hierarchy

This land parcel has a straightforward street hierarchy. Although the spine road-boulevard is outside of the red line, it clearly influences the layout of roads within all of the development that connect to it. It forms the principal route through the development; it also forms the principal urban space – in the same way that the SANG forms the principal open green space. I find it interesting that, in some minds, roads get demoted to annoying things that you have to have, and which dominate urban design by virtue of their land take and being key drivers of layout organisation. I have no such issue with roads (and accompanying cycle paths and footpaths). Roads are principal spaces that are dynamic in character because they provide for all kinds of movement through them; energise layouts in doing so; and are in constant use – all the time by a lot of people. This makes them, by definition, principal urban spaces – just as a city square can be, for example. They need the most attention in a lot of different design ways, because so many design expectations and technical requirements are loaded onto them. Here, the boulevard as a road does not form part of this land parcel, but its southern built edge does, and I have already commented on that above.

With respect to the street layout in the rest of the parcel, there is a notional hierarchy in terms of the secondary accesses off the spine road that penetrate up to fixed points, beyond which are a mix of tertiary routes that can include a pavement or are fully shared space. I would expect the tertiary routes to almost have the character of a private drive and this acceptably accounts for the layout in the lower area of the parcel where it approaches and forms the less formal and dense southern edge of the development. The street hierarchy also reflects other layout conditions – for example the development design changes where the secondary access road becomes a short spine route within the layout (Plots 139-147 facing plots 178-184). The layout treatment here reflects this by frontage setbacks and an increased street width. In this way, there is a pleasing variety of street hierarchy and layout, even within this small parcel.

Also welcome is that there are four secondary accesses off the spine road into this parcel, providing good connectivity. It appears that this penetrability vertically into the scheme compensates for the lack of lateral penetrability by road across the layout – I shall comment further below on connectivity.

Street enclosure

With respect to street enclosure, this is reasonably well considered and achieved successfully. That to the spine road is achieved through continuous built form; that to the rest of the layout is achieved through the close spacing and positioning of dwellings to form consistent and continuous building lines. Some parts of the layout require street enclosure to be formed of back garden boundaries (which should always be brick walls as a matter of principle). This is not problematic when it is a single back garden, only, and the housetype is designed to turn a corner. However, the layout of Plots 164-171, which form a single block, is somewhat problematic, with back-to-back gardens enclosing inset 8 quadruple parking spaces forming two edges of the block. I don't think this is a very attractive form of street enclosure and is a function of the block being too small: I suggest that this layout is reconsidered.

Generally, there is an attractive variety of building line positions, that will help avoid all streets having a similar character: some are close together with narrow front gardens to form tighter streets; some have setbacks with deeper green verges to create somewhat wider streets. I can't see any particular rationale for where the differentiation falls (such as all secondary access routes are wider; tertiary routes narrower – or the reverse). Perhaps more thought in future can be given to ordering street enclosure to aid street hierarchy and the legibility of routes and spaces. I think my wider issue here is that this parcel seems too small to achieve anything in particular that is distinctive in terms of street hierarchy.

Connectivity and legibility

This is generally a well-connected layout which, for its relatively small size, provides for a large number of connections within and without it. This is an important measure of the urban design quality of a layout and is achieved well here in the following ways:

- The parcel has a long frontage (and shallow depth), and this has enabled the creation of four secondary accesses into its layout off the spine road-boulevard. These provide multiple points of entry and successfully integrate the layout into the spine road. This avoids the spine road having the character of a fast through-route, only, rather than that of a well-connected street. This strategy of multiple secondary accesses should certainly be reflected in future parcels of development along the spine road.*
- Future access is designed into the layout so that this development parcel can link into the adjoining parcel to the east, and this forward planning is welcome.*
- There is no road connectivity proposed out of this parcel into the surrounding area as there is existing development along the south of it which acts as a barrier. However, the proximity of this parcel to the main entrance to Brightwell Lakes off the A12 will provide excellent connectivity.*
- The parcel is well connected by footpath out of it onto the spine road; the A12 frontage; the local service centre opposite; and the bridleway that forms the southern edge of the development. It also looks like there will be good footpath links into the neighbouring*

parcels to east and north. On these bases, therefore, I would say that this layout achieves the best possible connectivity out of it that is feasible.

- Connectivity within the layout is also generally well achieved, particularly in respect of footpaths which provide good transverse and lateral access to literally every corner of the site. For the footpath layout (and I am including the use of shared surfaces here), this is a very strong approach and is one that should be replicated across future parcels.*
- The parcel has a shallow depth, so it has not been difficult to achieve good footpath connectivity. This means, for example, that there are multiple routes through and across the layout from all parts of it to the spine road frontage and from there, of course, to the local service centre opposite and the main service centre and school further to the east. I welcome that internal transverse footpaths will provide 9 alternative walking access to the school, shops and surgery (for example). In this way, all these parcels will be joined up internally by people passing through and between them: this is of critical importance for the success of the masterplan. It should be replicated in future layouts.*
- My only query with respect to connectivity is that the transverse road layout within the site does not fully connect. This is not problematic in a practical sense – the four secondary accesses onto the spine road ensure full access. It just seems odd that a deliberate design decision has been taken to prevent internal road access between areas of the parcel. The result is strange dead-end cut-offs and the semi-isolation of blocks from each other. I don't think that these are necessarily good urban design outcomes. The Design Compliance Statement appears to suggest that this is a deliberate design decision to prioritise transverse movement to pedestrians (presumably over vehicles). If you are satisfied with this approach, then I can accept it also.*
- I have no real views about the connectivity of the allotments: I assume that we are satisfied with their position, accessibility and parking provision.*

On these bases, therefore, I judge that the layout connectivity is generally satisfactory. With respect to legibility, the parcel is small enough for that to be achieved almost by default. The two longer lateral secondary routes penetrate the full depth of the site and thereby provide good clear routes through the layout.

Edges

Most of what I would say about this aspect of urban design is accounted for, above. Edges can also include those within a layout where they, say, form an open space or between contrasting uses (school/residential). However, there are no such internal edge conditions shown in this small parcel.

The eastern edge of the parcel is a temporary one and will be subsumed into wider built form when the adjacent land is developed. It has set up a viable future street treatment, with a strong built edge, residential frontage, footpaths and green verges. This should ensure the seamless knitting together of the adjacent parcel.

The southern edge is designed with a rather substantial offset that includes a green buffer, tree planting, the bridleway, allotments and what appears to be the location for play

equipment or a trim trail (?) opposite Plots 48-52. This approach is apt for this parcel location: it makes this edge useful in several ways – always a benefit – and it acknowledges that it is not fronting onto undeveloped countryside adjacent.

What I may have hoped for here is a better edge treatment where lateral secondary and tertiary roads have vistas that are closed by the southern boundary of the development. No built form will close these vistas, so what will form them and what is the idea here? I can't perceive any. The detailed landscape drawings do not provide any particular strategy, such as tree clusters to provide view framing or green vista-closing (I am excepting the lateral vista to the allotments which will want to be retained for orienteering through the layout). The ends of all of these roads seem to peter out into nothing-in-particular where they meet the southern edge. This non-approach would benefit from reconsideration, particularly because the spine-road edge shows a very well-considered approach to vista closing building placement in respect of future secondary accesses to the north (see Plots 104-109 for example).

Landmarking

This parcel has a key role to play in urban design terms by landmarking the principal entrance to the entire Brightwell Lakes development at the western corner of this parcel. We've always been clear that this is a key area of consideration in the overall development, and I recall that CGI visualisations of the entrance were provided to the planning committee at approval of the outline application. The planning case officer had requested these to illustrate the aspirations of the layout in ensuring that the development has an A12 presence (through landmarking) and is also attractive, notwithstanding the requirement for the acoustic barrier.

I must say that I am rather disappointed with the design outcome of this key corner where two key frontages join to create the development entrance – there is a missed opportunity here and the lame approach shown must be reconsidered. Plot 7 on the corner is a three-storey townhouse (welcome) but this is not a corner-turning house type design. The flank elevation that will be read on entering the development reads as largely blank with random small fenestration. This elevation entirely ignores the spine road and the house's key position on it. This will be the first dwelling to be seen on approach into the development and when passing by it on the A12 and yet has received no special treatment – which is a serious let-down.

This disappointment is compounded by the treatment of the spine road frontage immediately adjacent: the presentation of a great length of high close boarded fencing (ugly and inappropriate in length, position and material) and the rather feeble positioning of a small flat-over-a-garage building. This building type is hardly appealing visually and presents a dead frontage to the spine road – next to the entrance, of all places for it. The large gap, the boundary barrier and the FOG, all combine with the poor-quality flank to Plot 7, to weaken the design of the entrance area to the development to its detriment. This, in no way, represents what we ever had in mind for this area of the design and is a great disappointment.

I do not support this part of the design which I judge needs to be reconsidered.

Characterisation

I can say here that I consider the characterisation of this parcel to have a strength of approach that I do very much welcome. This is derived from the consistency of design across the layout which provides a coherent character. For example, the corner-turning apartment buildings have a consistent design which imparts a strong uniformity to their position and what they achieve in urban design terms. This strengthens characterisation by avoiding randomisation (of which I have a horror) and is very welcome for it.

Further, across the layout there is a pattern of materials choice, fenestration design and what I would call an overall hybrid design approach that unifies the various housetypes deployed here. By hybrid design, I mean that the forms are mostly traditional combined with a non-traditional appearance. The resultant design coherence of this parcel is a beneficial urban design outcome and very welcome.

This characterisation outcome is one, therefore, that I support. We were clear at the masterplan stage of the overall development that the areas of the layout closest to the A12 and Adastral Park would have a more urban character; and that those close to the SANG and the southern and eastern countryside edges would have a more rural character. This is a simplification of the masterplan but will work as a general approach and is valid in urban design terms when the differing contexts to different parts of the site are considered. Therefore, the hybrid character of this parcel works well with the expectation of it having more urban qualities, and I fully support it.

Dwelling design

There are no aspects of dwelling design here with which I have any major concern. I do appreciate that housebuilders have a generally fixed model of housetype that they seek to deploy across their sites, based on marketing analysis of the area and what has sold well previously elsewhere. I am not seeking innovation in dwelling design here: there is no particular reason why there should be at Brightwell Lakes, specifically. What we must aim to secure is the best possible layout and ensure that the fixed housetypes have an appearance that provides some measure of local distinctiveness. This may not sound very ambitious but is, nonetheless, essential in producing attractive places for people to live and enjoy their surroundings. Innovation in house design, in my experience, tends to come from elsewhere: the private dwelling, the infill scheme or the small estate by a local developer.

With respect to detailed aspects of design worthy of comment:

- I like that the apartment block designs show generous areas of glazing. This aids their contemporary character and is in stark contrast to the mean little windows that can be seen with more traditionally styled designs.*
- I like the deployment of flat-roofed features such as to single and multiple dormers, principal staircase elements, and entrance canopies. Again, these work well in providing a contemporary design character.*
- Other aspects of the apartment block design (a key typology in this parcel) such as the combination red and dark colour scheme, deployment of dual materials combination, and framing devices all have the same benefit in imparting a contemporary feel.*
- The house designs to the spine road-boulevard are very effective when viewed in detail, combining modern fenestration of varied design and generous amount, modern door*

design, brick patterning, contrasting brick and brick bond (stack), brick in panels and as framing. This is more than I anticipated and is very welcome. This design approach will impart a distinctive appearance to the layout at the entrance to the Brightwell Lakes development and establishes a very welcome design quality precedent.

- The same design ethos is carried throughout the remaining housetype designs and, again, is very welcome for it: there is no dilution of effect.*
- I like the combination of contrasting dark grey and red brick for the housetype with the projecting gable to its façade.*
- Please note that I have not cross-referred housetype elevations to their plan layout positions to check on blank flanks or elevations with limited openings overlooking open space, corners, amenity, routes and such like. If you have the availability to do so, that will be a worthwhile exercise.*
- I am interested that the housetype EMAP11-EMAP12 is actually flats designed to look like a single dwelling, and with dual entrances on the front and flank elevations. An excellent housetype design and one that would be well deployed as a cornerturning design, particularly because they can avoid issues with back gardens siding onto roads.*
- The FOG is the only misfire as far as design quality goes. I don't really like this housetype – living over garages? Outlook onto a car park? Would be good if this housetype was consigned to the 1990s.*
- The apartment blocks are generally well designed to take account of the importance of all their elevations that face outwards onto streets and spaces.*

On these bases, therefore, we can be very satisfied that the proposed dwellings benchmark a good quality of contemporary design and set a good threshold for remaining parcels to meet.

Public open space

With respect to the provision of public open space, there is none within the proposed layout (I am excluding rear parking courtyards from this designation). This is not problematic, as the parcel is relatively small and will not be far from the provision of public open space elsewhere in the layout: the heritage park, for example, and the SANG. There is, therefore, no requirement here for the provision of public open space within the layout.

It can be argued that the linear green edge containing the bridleway along the south and west will provide a measure of public open space that is fully accessible.

Parking

There is a good mix of parking provided in the layout that is appropriate: on-street, frontage, on-plot, rear courtyard and garaging. A good mix is vital to the success of a scheme, to ensure that not any one particular type of parking predominates. There are some instances of a garage being provided behind tandem parking spaces (Plots 49, 52, 91, 149, 174): the garage will not be counted as a parking space in that scenario. What I find quite striking here is the significantly reduced provision of garage buildings in contrast to that which I usually see with layouts of this nature. It will be interesting to find out if this is

a deliberate strategy of the applicant, and, if so, the thinking behind it. I support the reduced number of garages shown here – very often, they simply appear in over-proliferation and as functionally extraneous. Their limited provision here is a real merit of the layout.

I note that visitor parking for is accounted for in the layout and that this is provided for on-street, which is the best location for it. Having reviewed a development layout recently at Walton North which included a large amount of visitor parking, I hope that there is sufficient provided for here. Nonetheless, the Parking Plan does show visitor parking appropriately pepperpotted across the layout, avoiding agglomeration or localised concentrations. Hopefully this strategy is supported by County Highways.

With respect to the inclusion of rear parking courts, these facilitate the use of apartment blocks providing frontage to the spine road. There is a general move away from the use of such parking arrangements, but they are really only problematic where they are small in scale and serve houses rather than apartments. Where they are provided for the latter, the bigger buildings provide a better scale of enclosure, better overlooking and also require larger courts, by definition. Instead of enclosed small spaces bounded by high fencing and not feeling entirely secure, the parking courts designed here will mostly be substantial, open and not unattractive spaces in their own right. The layouts here include sufficient green areas, and tree planting (if you look at the landscape detail drawings) to avoid the supermarket car park effect. There are active elevations onto these spaces from the apartment blocks and the flats over garages. All the parking courts permit pedestrian access through them from within the layout to the spine road frontage (I think - or are they secured by gates?), and this is welcome.

I will be interested to see what the DOCO has to say about some of the design aspects of these rear parking courts. I can see that there may be areas of concern: areas of intermediate walling around transit and parking spaces; security of the space; security of the rather narrow access routes between buildings onto the spine road frontage; or the multiplicity of these routes (DOCOs do not like permeability).

Boundary treatments

I suggest that the boundary treatment strategy needs revision. Excepting where I assume gate positions are illustrated (on the Boundary Treatment Plan), there should be no close-boarded timber fencing used on either of the key frontages to the A12 and spine roadboulevard. High brick walls only will be acceptable here, to ensure quality and continuity of frontage.

In fact, it should be a general principle that close-boarded fencing is restricted to rear garden boundaries only. Where side/rear garden boundaries form part of the streetscene – and there are multiple examples too numerous to cite here – the boundaries should consist of high brick walls. This applies also to the southern edge of the parcel which is not facing out into the countryside, and which does not need a ‘rustic’ approach to boundary treatment: an urban one is preferable.

I have no issue with timber fencing partly enclosing the rear parking courts: these may help soften their character, in contrast to a hard edge created by extensive brick walling (and brick buildings).

Materials

I am surprised that there is no detailed materials schedule supplied with this ARM application that would allow me to scrutinise materials specification and judge their acceptability or otherwise. The submitted materials plan is helpful in cross-referring materials to each individual housetype, and the key does tell us when brick will be used and what colour etc. The Design Compliance Statement does provide helpful illustrations and none of what is shown is problematic. However, without having the materials specified, I cannot tell what quality they will be.

Having scrutinised the ARM applications for Candlet Road and Walton North, both Felixstowe, relatively recently (for Persimmon and Bloor Homes, respectively), I can confirm that both had detailed materials specifications to support their schedule – so why not here? I have searched other submitted documents but cannot find the relevant detail.

I do appreciate that there are national brick supply/sourcing issues for developers but that doesn't stop this detail being provided at ARM stage and I suggest that we request it as part of the submission. It's absolutely too important to be left to a Condition on any permission. By the way, my comments here also apply to hard surfacing materials.

Design revisions

- 8.9. Following receipt of the detailed design comments, as quoted above, the applicant sought to address a number of aspects and subsequently submitted revised detail – currently still pending consultation. The applicant's designer summarised key design changes as below:

In terms of the overall layout the structure is fundamentally the same, the changes are within the details. The detailing of the highway layout in terms of carriage way widths, hierarchy and treatment of street trees and visitor parking has been review in its entirety reflecting SCC comments. Both the initial spur accessed from between Plots 11-16 and 27-32 and the second spur between Plots 76-81 and 97-102 are now shared surfaced with the remaining spurs having a conventional footpath dropping down to shared, then private drives, on the southern boundary. Fundamentally this approach allows the central space in front of Plots 92/93 to have a pedestrian priority and for a footway/cycleway to cross that space. The layout of the parcel to the south east, Plot No's 158-167 has been reviewed in order that there is frontage to all 4 sides of the block.

Approaching the site from the A12, Plots 6&7 have been re-elevated, partly to address and overlook The Boulevard and partly to increase the height of Plot 6 in order that it has more impact as the gateway into the site. Moving further along The Boulevard, Plots 104-109 have been increased in height to a full three storey to act as the vista stopper to the proposed spur road opposite.

Moving across the site to the southern edge, the landscaping has been reviewed in the light of the layout to ensure the view through the site is of the proposed landscaping which previously had been designed in isolation.

Finally, all boundary treatments have been reviewed and any rear garden boundaries facing onto the public highway are now facing brick walls.

- 8.10. The local planning authority's Principal Design and Conservation Officer has reviewed the recent revisions and confirmed his support for the changes made but further detail on this will be included in the update sheet.

Housing provision – with reference to Condition 65 (five percent M4(2)/M4(3) provision)

- 8.11. The W1a parcel provides 22 open-market dwellings, comprising a range of house types including one-bed maisonettes and four-bedroom houses.

Housing mix

- 8.12. The local plan identifies a need across all tenures for 41% of properties to be one- or two-bedroom dwellings. In this instance, 8 dwellings will be one- or two-bedroom units, equating to 36.4% - as shown in Table 1.
- 8.13. However, given the spatial extent of the Brightwell Lakes proposal, and the manner in which the development will come forward in phases, it was agreed that it is appropriate to consider the proposed housing mix in the context of the wider site as a whole, rather than calculated per individual parcel. Due to varying site sizes, characteristics, uses and constraints, it is acknowledged an individual parcel may not necessarily achieve the required housing mix within its defined site. The delivery of the required housing provision will be assessed collectively throughout the development of each phase.
- 8.14. This is apparent when taking into account the provisions proposed by parcels E1 and E1a, which comprises a greater number of larger units.
- 8.15. As secured by Condition 65 of the outline proposal, each phase of development shall include not less than five percent of unit to be constructed to comply within part M4(2) (Accessible and Adaptable Dwellings) and M4(3) (Wheelchair user dwellings) of the Building Regulations. As indicated on the proposed planning layout (PL-01-W1a Rev. B), there are no M4(2) or M4(3) compliant dwellings proposed within this parcel. However, when viewing both W1 and W1a parcels as a whole, the 'western' development includes a total of 5.6% M4(2) units.

Affordable housing

- 8.16. As dictated by the s106 legal agreement, the affordable housing provision for the Brightwell Lakes development is set to twenty five percent (25%). Of these affordable dwellings, the target tenure mix is: 25% affordable rent, 25% intermediate rent, 25% shared ownership, and 25% shared equity – or otherwise approved by the local planning authority pursuant to the relevant affordable housing schedule. These proportions are to be addressed across the whole site and there will be reserved matters policies which provide greater and lesser quantities and proportions dictated by the characteristics of that parcel. It will remain important closely monitor the accumulating mix as the site progresses.
- 8.17. For context, the proposed mix across all four parcels (E1, E1a, W1 and W1a), which are pending consideration is shown in Table 3.

Table 1: Proposed housing mix for Phase W1a

Phase E1 housing mix	Number of dwellings
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Market	1-bed apartment	3
	2-bed apartment	3
	2-bed flat over garage	2
	3-bed house	7
	3-bed town house	7
Overall total		22

Table 2: Proposed housing provisions against percentage of district wide need

Phase E1 housing provisions against policy		
Number of bedrooms	Percentage of district wide need	Percentage proposed
1	12%	13.6% (3 units)
2	29%	22.7% (5 units)
3	25%	63.6% (14 units)
4+	33%	0% (0 units)

Table 3: Overall housing mix across Phases E1, E1a, W1 and W1a

Mix	Parcels W1 & W1a		Parcels E1 & E1a		Total	
	# of units	%	# of units	%	# of units	%
Private						
1 bed	3	2.6%	0	-	3	1.5%
2 bed	13	11.3%	6	6.8%	19	9.3%
3 bed	93	80.9%	34	38.6%	127	62.6%
4 bed	6	5.2%	36	41%	42	20.7%
5 bed	0	-	12	13.6%	12	5.9%
Affordable						
1 bed	38	47.5%	8	23.5%	46	40.3%
2 bed	42	52.5%	2	5.9%	44	38.6%
3 bed	0	-	14	41.2%	14	12.3%
4 bed	0	-	10	29.4%	10	8.8%
Overall – 317 dwellings (114 affordable [35.9%])						
1 bed	41	21%	8	6.6%	49	15.4%
2 bed	55	28.2%	8	6.6%	63	19.9%
3 bed	93	47.7%	48	39.3%	141	44.5%
4 bed	6	3.1%	46	37.7%	52	16.4%
5 bed	0	-	12	9.8%	12	3.8%
Total	195		122		317	

Ecology – with reference to Condition 14 (environmental action plan – part 2)

- 8.18. To accord with the requirements of the outline planning permission, a Part 2: Environmental Action Plan (EAP Part 2) and an updated Ecological Impact Assessment containing the results of updated surveys, have been prepared to support the submission and also relates to Phases E1, E1a and W1.

- 8.19. East Suffolk Council's ecologist has reviewed the Updated Ecological Assessment (SES, July 2021) and the Part 2: Environmental Action Plan Reserved Matters Phases E1, E1a, W1 and W1a (SES, July 2021) and is satisfied with the conclusions of the consultant.
- 8.20. In the absence of appropriate mitigation measures, the proposed developments will result in adverse impacts (of a range of severities) on a suite of ecological receptors including:
- Recreational disturbance impacts on national and international designated sites (all four phases);
 - Loss of Open Mosaic habitats (Phase W1 and W1a);
 - Impacts on retained semi-natural habitats from pollution events and lighting (all four phases);
 - Loss of rare flora including annual beard-grass, dittander, mossy stonecrop, clustered clover, corn spurrey, smooth cat's-ear and corn marigold (Phase W1 and W1a);
 - Spread of Japanese knotweed (Phase E1 and E1a);
 - Impacts on badgers during construction (all four phases);
 - Loss/disturbance of bat tree roost (all four phases);
 - Loss/fragmentation of bat foraging and commuting habitats (all four phases);
 - Loss of breeding and wintering bird habitats (particularly for breeding skylark and linnet) (all four phases);
 - Loss of invertebrate habitats (Phase W1 and W1a);
 - Loss of reptile habitat, killing/injury of animals (all four phases);
 - Impacts on hibernating common toad and hedgehog (all four phases).
- 8.21. However, the updated ecological assessment details measures which are adequate to mitigate the identified impacts. These include implementation of 25.1Ha of SANG (under planning application DC/18/2775/ARM); a financial contribution to the Suffolk Coast RAMS; production and implementation of a Construction Environment Management Plan (CEMP) to control construction related impacts (including pollution controls, construction noise and lighting; construction impacts on individual species etc.); production and implementation of a Landscape and Ecology Management Plan (LEMP) to ensure long term beneficial management of the SANG and other areas of greenspace (as part of the Part 2: Environmental Action Plans); implementation of ecologically sensitive lighting; translocation of turves/plants of notable plant species to the SANG area; eradication of Japanese knotweed from the site; sensitive external lighting design; mitigation for removal of trees with bat roost potential; creation of new bat foraging/commuting habitats as part of SANG and new greenspace/landscaping; timing to avoid works impacting on nesting birds and mitigation measures to avoid impacts on reptiles.
- 8.22. Although the loss of open mosaic habitats will not be able to be fully mitigated, compensation will be achieved through the creation and long-term management of some such habitat, as well as other ecologically desirable habitats, as part of the SANG. The Updated Ecological Assessment also identifies that there will be an adverse impact on breeding skylark as a result of the loss of suitable nesting habitat from the overall development area, although the significance of this is predicted to be time limited due to the relatively recent increase in nesting activity at the site due to the reduction in quarrying and agricultural operations. However, this impact could be further reduced by the creation of offsite skylark nest plots or nearby arable land. This is something which

should be explored by the applicant as the development phases progress to determine whether additional mitigation is deliverable.

- 8.23. The Updated Ecological Assessment also includes a suite of ecological enhancement measures, including provision of integrated bat boxes in at least 5% of new dwellings, provision of integrated bird boxes into at least 80% of new dwellings, provision of bug hotels in at least 20% of new dwellings, landscape planting using wildlife friendly species and the provision of 'hedgehog highway' holes in the bottoms of new garden walls and fences. These measures are set out in the Part 2: Environmental Action Plan Reserved Matters Phases E1, E1a, W1 and W1a document.

Flood risk and drainage – with reference to Condition 30 (earthworks strategy); and Condition 48 (surface water drainage scheme)

- 8.24. Suffolk County Council as the lead local flood authority have reviewed the following submitted documents and recommend approval, subject to conditions:

- Stantec, Western Parcel Proposed Earthworks, 10596/2011/102/P02, 24/06/2022
- Stantec, Phases W1 & W1A Surface Water Drainage Plan, 10596/2011/110/P02, 22/06/2022
- Stantec, Phases W1 & W1a Surface Water Catchment Plan, 10596/2011/111/P02, 22/06/2022
- Stantec, Phases W1 & W1a Surface Water SuDS Details, 10596/2011/113/P02, 22/06/2022
- Stantec, Phases W1 & W1a, Flood Exceedance Plan, 10596/2011/114, 22/06/2022
- Stantec, Technical Note Phases W1 & W1A, 332210596-2001-TN004A, 22/06/2022
- Email from Sam Lonsdale dated 27/06/2022 @ 17:11 outlining peak discharge rates from W1 into spine network

- 8.25. The below points should be noted for consideration as part of any future discharge of conditions application for this part of the development:

- The SANG ARM application should be designed with 45% CC allowance. As part of the W1 and W1a DRC a 45% sensitivity test should be undertaken to determine any potential areas of flooding.
- Assessment of surface water treatment requires further consideration and supporting details to demonstrate compliance with CIRIA SuDS Manual. Specific concerns relate to the depth and specification of bioretention material.
- Treatment indices for PD 5 & 6 do not look to be correct and will need to be addressed.
- Details should be provided for attenuation feature overflows, for example, overflow chambers/standpipes to allow water to flow into the perforated pipe beneath in the event of surface blockage (due to lack of maintenance).
- There should be sufficient upstream protection detailed prior to roof outfalls into perforated pipes beneath permeable paving to prevent a risk of blockage by moss/leaves/debris etc. Will the perforated pipe be inspectable (i.e. will it have a

chamber at one or both ends)? Likewise, where connections are made beneath swales It must be demonstrated that the discharge from W1 & W1a has been allowed for in the finalised spine network design.

- Actual rather than indicative design of property and driveway infiltration features must be undertaken.
- Agreement in principle from SCC Highways that a shallow conduit connection to bioretention features is acceptable.
- Table 8 of the Technical Note identifies a wide range between most levels of proposed infiltration and that of testing previously undertaken. Further infiltration testing will be required to confirm actual infiltration rates at the depth of proposed infiltration. DRC design should identify: 1. Location of previous infiltration tests 2. Infiltration rate threshold used for design purposes for each sub-catchment. Note – sub-catchments should be based on proposed infiltration features and should consider both proximity of these features to one another and proposed depths 3. Number of future tests to be conducted in each sub-catchment, including depths Once the above has been established, a design can be agreed at DRC based on these assumptions. Future testing will need to identify actual infiltration rates. If better rates are achieved, the design will be conservative, if worse rates are achieved the design will need to be varied. It is therefore advised to use conservative assumptions for DRC design.
- Clarification of maintenance and adoption arrangements as it still states adoptable sewers will be adopted by Anglian Water.
- It's unclear why some calculations have not used the correct feature, for example crates being used to represent permeable paving and attenuation basin being used to represent swales.
- Play equipment has been located in the highway swales draining H2. This could lead to compaction of the surface and a reduction in infiltration potential. There should be clarification on this point which either details how compaction will be mitigated, with agreement of the proposed adoptee, or the play equipment moved.
- Water re-use options for the allotments should be explored and facilitated where possible.

Please note that whilst these points identify obvious points of clarification, they should not be considered exhaustive and the LLFA should be contacted for clarification required on any additional aspects.

Highways – with reference to Condition 11 (access strategy); Condition 25 (refuse and recycling); Condition 26 (cycle storage); and Condition 41 (layout details of estate roads and footpaths)

- 8.26. Access arrangements for the wider development were established at outline stage and are not for consideration under this submission, these are identified via the A12 and Ipswich Road, which link into the Central Boulevard Spine Road - a tree lined street and running

through the centre of the site. The proposed layout for each phase is informed by the internal access arrangements and connectivity with the wider site.

- 8.27. The primary access to this parcel is via the Spine Road. Across the parcels of development, the road structure changes from primary, to secondary to tertiary roads, which branch out towards the core and edges of the development.
- 8.28. Notwithstanding the surface water drainage features, which are outside of this parcel and approval of such in another application may affect the adoption of the roads on this parcel, and the inclusion of play equipment in the surface water features that will be required to be relocated in order to be adopted by SCC, the highways authority is supportive of the design detail and strategies submitted and recommends approval subject to conditions.

Public rights of way

- 8.29. Brightwell Lakes has a number of Public Rights of Way crossing the site which provides connections for users of footpaths and bridleways between the communities surrounding the site. Consequently, a key focus within the outline planning permission is the connectivity through the site for pedestrians, cyclists, horse riders and those using other forms of non-vehicular means of travel.
- 8.30. Enhancing the network of Public Rights of Way by ensuring the non-vehicular traffic in the form of walking and cycling is given priority on key routes such as the Central Boulevard Spine Road and the main points of access into Brightwell Lakes. Through providing priority access for non-vehicular movements, residents and visitors to the site will be encouraged to use sustainable modes of transport as their preferred choice for journeys at Brightwell Lakes.
- 8.31. The local planning authority is working proactively to ensure key revisions are accounted for to secure a well-designed scheme in accordance with policy and outline requirements. It is expected that this will be reported on further in the Committee update sheet.

Landscaping and open space – with reference to *Condition 12 (hard and soft landscaping); and Condition 28 (arboriculture)*

- 8.32. Strategic areas of open space are provided across the wider site, as part of the extensive green infrastructure provision, with a green corridor adjoining this parcel along its western edge. Additionally, pocket areas of public open space have also been incorporated into the layout of the site and have been designed and located in order to supplement key vistas, ensure natural surveillance and create green links with the surrounding green infrastructure.
- 8.33. Detailed landscape proposals have been prepared for the first phases of development at Brightwell Lakes, as illustrated on the Landscape Masterplan and Detailed Landscape Proposals for Phase W1. These are also supported by a Measured Works Schedule to ensure that the necessary planting and landscape works are undertaken correctly.
- 8.34. Existing vegetation is retained and enhanced with native skyline and native character trees within the open spaces, site boundaries and wildlife corridors, which aims to help the proposed development blend into the wider landscape. The landscape proposals around the boundaries of the site have been prepared and designed to ensure that they provide

an appropriate mix of species which are natural to the local environment and are resilient to climate factors over the lifetime of the development, it also provides linkages between residential areas and the wider green infrastructure network across Brightwell Lakes.

- 8.35. The East Suffolk council's landscape team have reviewed the submitted documents covering: Arboricultural Impact Assessment, Arboricultural Method Statement, Landscape Masterplan, Landscape Details Plans Landscape, and Schedule of quantities have advised that they are all acceptable. However, in light of the comments raised by Waldringfield Parish Council, further discussions will entail prior to determination to ensure the landscaping scheme is of the highest standard of quality.

Environmental protection – with reference to Condition 60 (noise attenuation scheme)

- 8.36. An East Suffolk Council environmental protection officer has collectively reviewed the submitted material in relation to the following applications - DC/18/2774/ARM; DC/21/4002/ARM; DC/21/4003/ARM; DC/21/4004/ARM. Their comments are noted below in full:

I acknowledge receipt of the Cass Allen noise assessment report (RP01-21254-R5) dated 6 the May 2022 which has been revised in response to my queries sent via the planning case officer on 22 April 2022.

Having reviewed this final version of the report I am satisfied that the various assessment parameters and assessment periods (day and night) have now been set out to identify which parameter dictates mitigation measures in various parts of the development. As a result, I note that in some areas following detailed calculations, enhanced window specifications are judged necessary to bedrooms/habitable rooms of some plots. If mechanical ventilation measures are utilised to any plots/rooms, then BS 8233:2014 guideline noise values (internal) will need to be achieved inclusive of the ventilation system noise.

I also note in the assessment, that enhanced window and ventilation systems will be necessary to habitable rooms of dwellings that face the spine road through the development whether north or south of that road. We will expect confirmation therefore that window and ventilation systems of a suitable acoustic performance are implemented along the spine road facades.

With respect to the A12 acoustic barrier design, I note the drawings and details that are repeated within the Cass Allen noise assessment report. This is then included in the most recent noise modelling exercise to predict both façade noise levels, but also noise levels to external amenity areas. It must be recognised that the barrier design, which is disrupted for the A12 access road, is therefore limited in its effectiveness at reducing noise levels to the new residential development beyond. A12 road traffic noise will propagate through the gap in the acoustic bund/barrier combination at the site's A12 spine road entrance, as well as north and south of the extents of that bund. It is noted also that the cumulative noise levels including operational phase spine road traffic mean that elevated noise levels will exist across most of phases W1 and W1a.

The key components of an effective acoustic barrier are its length relative to the source, and the height. I understand that the footprint of the bund/barrier extends as far as it

possible to incorporate in the scheme design. I assume that the height of the bund/barrier combination has been maximised considering visual and other relevant factors.

Noise predictions to external amenity areas are therefore higher than desirable particularly across the phase W1 area, with noise levels in the range 55-60 LAeq,16hour predicted in many areas, and the noise contour of 50-55 LAeq,16hour extending quite a long way eastwards. I note however that as discussed in the Cass Allen report, in accordance with BS 8233:2014 higher noise levels might be accepted near to main roads and infrastructure (strategic transport network) and where development might be desirable. I note also that the Brightwell Lakes development in its entirety will provide amenity and recreational areas with lower noise levels within a few minutes' walk of Phases W1, W1a, and E1.

Were road traffic speeds on the A12 to be decreased in future from the current speeds, then resultant external noise levels across these development areas should be lower than predicted to date and a better external noise climate may be experienced.

I am satisfied that within the design constraints of this development, good acoustic design has been applied in terms of the orientation of buildings and habitable rooms, and the use of buildings themselves as barriers to road traffic noise to create quieter areas beyond. These benefits to external amenity areas are limited however as previously discussed and noise levels to garden areas in some parts of the development will be above guideline values.

Finally, I note that Cass Allen have set out their proposals for the pre-occupation noise testing of a number of residential plots to test the effectiveness of the proposed noise mitigation measures. I am pleased to see the selection of the most vulnerable plots 1,7,8,9 and 22 for this testing. If these tests, then results are satisfactory, we can then be confident at other plots across the affected areas. Ahead of the commencement of these tests, I would like to better understand how the proposed short measurement durations will be used to calculate the noise levels over the assessment time periods of 16 hour day and 8 hour night to ensure the calculated values are representative.

Conclusions

Given the development site design in proximity of the A12, I am satisfied with the design of the acoustic barrier/bund combination provided that the heights and lengths have been maximised in consideration of other planning factors. I am satisfied with the final version of the noise assessment undertaken for these areas of the development site and the noise mitigation measures recommended. The final matter outstanding will be the post-construction, pre-occupation noise testing of the identified plots to ensure the mitigation measures have been effective, and the internal guideline values of BS 8233:2014 met.

Heritage

- 8.37. Heritage concerns raised by Historic England have been acknowledged; however, given that this particular phase of development does not directly impact the heritage assets (with additional development planned north of the Spine Road), any potential harm will be adequately addressed at a later reserved matters stage.

8.38. It is considered illogical for them to be raising such concerns given that this phase of the scheme will be completely separated from the heritage assets by a whole area of other residential development. Considerable attention was already given to this protected area at outline stage with a great amount of masterplan detail on how the heritage park and surrounding development will frame the heritage assets. Historic England's concerns in regard to this phase are therefore misplaced. Later attention to the heritage assets across the entire site is secured by conditions on the outline planning permission (DC/20/1234/VOC) – noted below for reference:

- *Condition 22: All development with a frontage onto the Heritage Park, as shown by the wide blue line on Drawing No 31677 12 I received 07.03.2018, shall be submitted within a single comprehensive reserved matters application covering layout, scale, appearance and LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ DC – PEVOCZ v.1 landscaping. Any development within that area shall be in substantial accordance with the design principles set out on that drawing. The reserved matters application for this area shall be accompanied by a statement demonstrating substantial accordance with the design principles.*

Reason: To ensure that the design of buildings and spaces within this part of the site reflect a single coherent approach focussed on the setting of heritage assets and creation of a heritage led urban park and strong built edge. The building heights and density of this area are accepted, under this outline permission, to be up to the maximum parameters of the plans listed in condition 4.]

- *Condition 47: No development within 50 metres of the heritage assets listed below shall commence until a management plan outlining a programme of restoration, management and interpretation of those assets has been submitted to and approved in writing by the Local Planning Authority. Heritage assets B, C and D listed below shall be submitted in one comprehensive programme. If not already set out in the Construction Management Plan (Condition 18) the management plan must address protection of the scheduled monuments during construction. Interpretation shall include details of information board(s) (or other means of presenting the site's heritage and archaeological interest) to be erected at the site explaining the history and significance of the site and its heritage assets and any archaeological significance. The approved information board(s) shall be erected on the site within a timescale to be agreed in writing by the Local Planning Authority and retained thereafter on the site. The scheduled monuments and WWII non-designated heritage assets are: A. Two Bowl Barrows in Spratt's Plantation (NHLE 1008731) B. Bowl barrow and pill box 450m north west of Sheep Drift Farm (NHLE 1008730) C. Type 23 pillbox associated with gun emplacement and underground shelter D. Eight- sided brick built base to radio mast In respect of heritage assets A and B, the submission of the respective programme shall be submitted following or concurrent with an application for Scheduled Monument Consent to Historic England. Note: The Management Strategy for the Heritage Park as a whole is covered by the Environmental Action Plan and that will precede this condition by accompanying the reserved matters application for the park.*

Reason: To ensure that designated and non designated heritage assets identified on the site are protected, preserved and enhanced. To ensure that works proposed to

Scheduled Monuments are consistent with works that may require Scheduled Monument Consent.

9. Conclusion

- 9.1. This reserved matters proposal has been informed by the parameters established within the outline planning permission. The suite of submitted material demonstrates that Phase W1a of the development (as viewed collectively with Phase W1) promotes a high-quality design that responds positively to the characteristics defined by established parameter and character plans established within the outline planning permission. It also more recently responds to the very detailed Principal Design and Conservation Officer's response.
- 9.2. Whilst the revised design detail is yet to be fully reported on it has design professional support, and the general scale, appearance, and layout of the proposal is considered acceptable, with the aim of providing a well-integrated and sensitively designed scheme, particularly in terms of connectivity and green infrastructure.
- 9.3. Whilst there are still outstanding comments to address, and the fundamental component of the submitted scheme is considered acceptable.

10. Recommendation

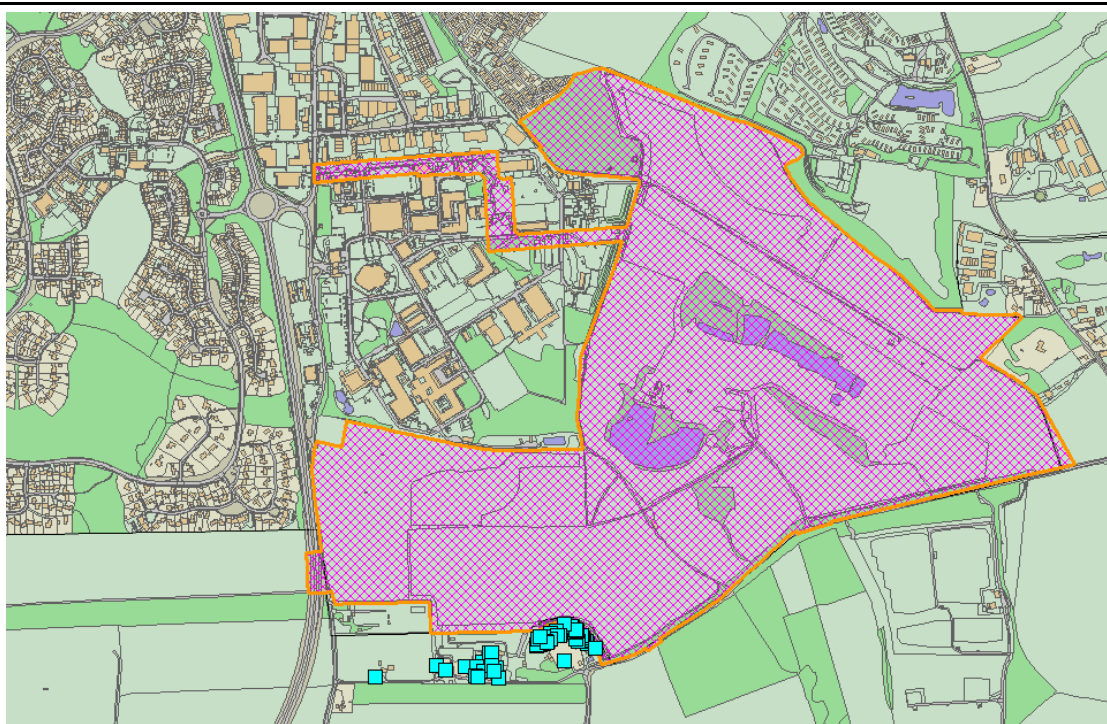
- 10.1. Authority to approve subject to no new material issues being raised during the latest re-consultation period, all outstanding matters being resolved, and agreement of conditions.

Conditions and informatives to be agreed upon receipt of all consultation responses and covered in the committee update sheet. These are expected to be minimal, with extensive conditions already applied on the outline consent still applicable.

Background information

See application reference DC/21/4003/ARM on [Public Access](#)

Map



DO NOT SCALE SLA100019684

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Key



Notified, no comments received



Objection



Representation



Support