



Committee Report

Planning Committee South – 19 April 2022

Application no DC/21/4004/ARM

Location

Land to the south and east of Adastral Park

Expiry date 23 November 2021

Application type Approval of Reserved Matters

Applicant Taylor Wimpey

Parish Martlesham

Proposal 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.

Case Officer Rachel Lambert
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1. Summary

Proposal

1.1. 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.

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 made by members at the respective planning committee due to the significance of the Brightwell Lakes proposal. This is the first reserved matters application for the design of housing and it is considered important to place this before the Planning Committee. Future reserved matters application would not automatically be referred to the Planning Committee unless triggered through the Referral Panel process.

Recommendation

- 1.3. Authority to approve subject to resolving all outstanding matters 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 submitted for reserved matters approval simultaneously. The applicant advises that this will represent the first phases of residential development to be delivered at Brightwell Lakes.

This area of the scheme is located north of Ipswich Road and south of the central areas of green infrastructure, with a site area measuring approximately 5.36ha. As per the outline design, this phase of development is bound by a green corridor on the west and south, the central Boulevard Spine Road on the north and the area identified for education on the east.

Planning history

- 2.2. The relevant planning history for the site includes the following:

- **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 the 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 the 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/17/1435/OUT
This application is pending consideration but has not yet been concluded for a recommendation.

- **DC/21/4003/ARM:** Approval of reserved matters - the construction of 22 dwellings together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase W1a) - on DC/17/1435/OUT
This application is pending consideration but has not yet been concluded for a recommendation.

- **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 is to be considered alongside this application by the Planning Committee South.

3. Proposal

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

Condition 1

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 119 dwellings (including 34 affordable houses), associated works, landscaping and infrastructure for Brightwell Lakes - Phase E1, together with details of Green Infrastructure relating to the adjoining part of the southern boundary (Ipswich Road) SANG.
- 3.3. Three units located within this parcel is subject to a separate reserved matters submission, referred to as Parcel E1a (DC/21/4005/ARM) – the units within Parcel E1a will provide the show home area for Phase E1 of the development.
- 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 8 – Character banding plan
 - Condition 10 – Access strategy
 - Condition 12 – Landscaping details
 - Condition 23 – Building materials
 - Condition 24 – Boundary treatment plan
 - Condition 25 – Recycling/bin storage plan
 - 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
- 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.

4. Consultation

Third Party Representations

- 4.1. No third-party comments 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 listed. Where the consultee comments do not alter in response to the most recent revisions, or where matters have been resolved, the latest ‘date reply received’ date is noted within the summary of comments.

Consultee	Date consulted	Date reply received
Brightwell Parish Council	8 September 2021 13 September 2021 14 February 2022	19 September 2021 20 September 2021
Summary of comments: "The Parish Council has no comments to make about this reserved matters application."		

Consultee	Date consulted	Date reply received
Buckleham Parish Council	8 September 2021 13 September 2021 14 February 2022	4 November 2021 15 February 2022
Summary of comments: "No comment."		

Consultee	Date consulted	Date reply received
East Suffolk CIL	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Design and Conservation	8 September 2021 13 September 2021 14 February 2022 15 March 2022	No response 17 November 2021
Summary of comments: Internal consultee – comments included within reporting.		

Consultee	Date consulted	Date reply received
Disability Forum	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Environment Agency - Drainage	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	8 September 2021 13 September 2021 14 February 2022	13 September 2021 9 March 2022
<p>Summary of comments:</p> <p><u>9 March 2022</u> “Based on our response criteria thresholds, which we use to assess whether to respond to planning applications, Economic Development will not be commenting on this application.”</p> <p><u>13 September 2021</u> “Based on our response criteria thresholds, which we used to assess whether to respond to planning applications, Economic Development will not be commenting on this application as we do not feel it directly relates to our economic objectives or criteria as outlined in the East Suffolk Growth Plan 2018 – 2023.”</p>		

Consultee	Date consulted	Date reply received
East Suffolk Ecology	8 September 2021 13 September 2021 14 February 2022 15 March 2022	6 December 2021
<p>Summary of comments: Internal consultee – comments included within reporting.</p>		

Consultee	Date consulted	Date reply received
Natural England	8 September 2021 13 September 2021 14 February 2022	11 October 2021 No response 1 March 2022
<p>Summary of comments: No objection subject to appropriate mitigation being secured.</p>		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	8 September 2021 13 September 2021 14 February 2022	No response
<p>Summary of comments: No response.</p>		

Consultee	Date consulted	Date reply received
SCC Fire and Rescue Service	8 September 2021 13 September 2021 14 February 2022	8 September 2021 14 February 2022
<p>Summary of comments:</p> <p>“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.”</p>		

Consultee	Date consulted	Date reply received
Henley Parish Council	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Housing Development Team	8 September 2021 13 September 2021 14 February 2022 15 March 2022	28 March 2022
Summary of comments: “The application is for a net total of 119. For this site, a total of 34 affordable homes has been agreed. At least 40% of all dwellings should meet the building regulations M4(2) wheelchair accessible standards, (Suffolk Coastal policy requires 50%), both for market and affordable homes. However, the matrix below reflects the higher need for M4(2) dwellings in the affordable sector, especially the affordable rented sector. The wheelchair adaptable standard M4(3) would be supported and applicants are welcome to discuss how these properties could be delivered as part of the scheme. All homes must be in small clusters of no more than 10 homes and not contiguous, well-integrated and indistinguishable within the scheme with equal access to amenities such as children’s play parks and amenity green space. Dwellings should meet the following size standards; 1 bed, 2 persons; 2 bed, 4 persons; 3 bed, 5 persons; and 4 bed, 6 persons, with a predominance of houses, especially for families. The Council’s housing requirements are provided below based on SHMAA evidence and local housing need from the Council’s Housing Register.”		

Consultee	Date consulted	Date reply received
Kesgrave Town Council	8 September 2021 13 September 2021 14 February 2022	27 October 2021 25 February 2022
Summary of comments: “Support.”		

Consultee	Date consulted	Date reply received
Kirton Parish Council	8 September 2021 13 September 2021 14 February 2022	4 October 2021
Summary of comments: “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.”		

Consultee	Date consulted	Date reply received
Martlesham Parish Council	8 September 2021	22 October 2021
	13 September 2021	28 February 2022
	14 February 2022	

Summary of comments:

“Arboricultural Impact Assessment

Martlesham Parish Council (MPC) is pleased to note that the majority of trees along the Ipswich Road are to be retained. MPC would like to see East Suffolk Council (ESC) confirm that any trees earmarked to be removed are of poor quality. Furthermore, MPC would like to see measures put into place for dealing with watering any newly planted areas. Environmental Action Plan: Part 2 February 2022 MPC is pleased to note that further detail has been provided regarding wildlife enhancement measures.

Appendix 6:

MPC is pleased to note the measures proposed to ensure that lighting impact on wildlife during the construction phase is minimised and that the detailed lighting design has been produced in accordance with the relevant guidance. MPC is pleased to note the lighting design consultants have made 5 recommendations in order to minimise the effect on the southern boundaries of phases E1 and E1A.

We note that:

- All lighting should be LED
- Rear shields should be used close to ecologically sensitive areas
- There should be careful consideration of column heights
- Lights should be mounted on the horizontal to avoid light spillage
- MPC would ask ESC to confirm that these recommendations are fully carried through in the detailed design proposals.

Coloured Layout PL-02-E1 Revision C

MPC would like to understand the following:

- What measures will be put in place to prevent visitor parking becoming permanent parking?
- What are the arrangements for commercial van parking to ensure the overall visual amenity of the site?
- Bin collection points are now indicated, but it is unclear where the refuse storage areas are located.
- MPC would welcome detailed proposals for grey water storage and water harvesting, given that this is a water scarce area.

Detailed Soft Landscaping Proposals

JBA-18/163-8,9,10,11 and 12 Revision C

The revised landscaping proposals show areas to be seeded with wildflowers between the car parking and the joint cycling and walking track connecting Ipswich Road to the Boulevard. Given the density of parking provision and the narrowness of the parking access, it is unclear how this area is to be protected from unofficial parking. If a knee rail is to be provided, this is not shown in the key on the drawing. The overall visual and biodiversity impact of the proposed arrangement would be poor if these areas were to become a carpark and would lead to frustration on the part of residents and visitors.”

Consultee	Date consulted	Date reply received
Melton Parish Council	8 September 2021 13 September 2021 14 February 2022	9 September 2021
Summary of comments: "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 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Ipswich & East Suffolk CCG & West Suffolk CCG	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Police - Design Out Crime Officer	8 September 2021 13 September 2021 14 February 2022 15 March 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Network Rail Property (Eastern Region - Anglia)	8 September 2021 13 September 2021 14 February 2022	14 September 2021
Summary of comments: "After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals."		

Consultee	Date consulted	Date reply received
Rushmere St Andrew Parish Council	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Section 106 Officer	8 September 2021 13 September 2021 14 February 2022	29 September 2021 23 February 2022

Summary of comments:

“The application seeks approval of reserved matters for Phase E1 of the development approved under Outline Planning Permission Ref. DC/17/1435/OUT, on 10th April 2018. The permission was approved subject to a s.106 agreement that sets out details of the developer contributions required, including those required by Suffolk County Council. Details of the contributions and other related obligations are set out in Schedules 5,6 and 8 of the agreement. The developer should ensure that the obligations, including the payment of the contributions, are fully complied with in accordance with triggers set out in Schedule 3. The County Council otherwise has no further comments, in relation to the developer contributions required.”

Consultee	Date consulted	Date reply received
SCC County Archaeological Unit	8 September 2021 13 September 2021 14 February 2022	2 December 2021

Summary of comments:

“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.”

Consultee	Date consulted	Date reply received
SCC Cycling Officer	8 September 2021 13 September 2021 14 February 2022	No response

Summary of comments:

No response.

Consultee	Date consulted	Date reply received
SCC Flooding Authority	8 September 2021 13 September 2021 14 February 2022 21 February 2022	21 September 2021 11 March 2022

Summary of comments:

Recommend approval subject to conditions.

Consultee	Date consulted	Date reply received
SCC Highways Department	8 September 2021 13 September 2021 14 February 2022 15 March 2022	3 November 2021

Summary of comments:

Holding objection.

Consultee	Date consulted	Date reply received
Suffolk Police Designing Out Crime Officer	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SUSTRANS	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Suffolk Wildlife Trust	8 September 2022 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	8 September 2021 13 September 2021 14 February 2022 15 March 2022	27 October 2021
Summary of comments: "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 14 March 2022	22 October 2021 1 March 2022
Summary of comments: <u>1 March 2022</u> "Access WPC previously commented on the conflicting statements made in the ARM/RMA applications regarding vehicular access points off the Ipswich Road and we sought clarification. We do not feel that this has been addressed as the information appears still to differ depending on which document/format is presented. The current Planning Statement Addendum is to highlight amendments to the previously submitted Planning Statement and "is to be read alongside the Planning Statements (relating to each individual phase) submitted with the applications in August 2021." The Addendum makes no reference to the Access points so the statement made in "The		

Planning Statement relating to phase E1”, para 5.59 appears to still apply – i.e. “5.59 Access from Ipswich Road, will be a combination of enhanced and improved points of entry which were previously associated with the quarry activities that have since ceased on the site. 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”. We say that paragraph 5.59 requires amendment. It is misleading and appears to suggest that there will be several (i.e. more than two) vehicular access points off the Ipswich Rd. This does not conform with Outline Planning Permission DC/17/1435/OUT which included two points only of vehicular access/egress on Ipswich Rd. The first being (Ipswich Rd Eastern Access) the existing access route to the quarry and the second, a new access (Ipswich Rd Western Access). This second access was subject to Planning Condition 43, which requires “a design strategy to reduce traffic using this access, through traffic calming or street design” in order to “distribute traffic across the other accesses and to calm the effect of traffic on that junction in order to maintain the rural character of Ipswich Road”. Furthermore, in the recent (Feb 2022) BLCF meeting, in a response to a question about construction traffic access, Taylor Wimpey reiterated that the same access point that is used for aggregates access i.e. the existing route to the quarry, will be used for access/ingress of construction traffic.

2. Street lighting

WPC previously pointed out that no external lighting plan had been submitted, contrary to condition 61 of outline permission. Such a plan has now been submitted. It includes a great deal of detail describing the different types of lighting across different locations and sensitivities. To our untrained eye this appears to be appropriate but we are not really qualified to make technical comment.

3. Car Parking

The WPC expressed concerns, in particular regarding the design of the court parking schemes, found predominately in phase W1. We are pleased to see that there are no such parking courts in E1 as off-plot parking appears to be accommodated via allocated parking spaces on the edge of green space.

4. Charging points for electric vehicles

We are very disappointed to find no reference to this topic in the new ARM documents. In the February BLCF, Taylor Wimpey detailed plans to install EV charging points. As a minimum, cables are being laid to allow their installation on all on-plot parking from the first dwelling. WPC would wish to see this commitment confirmed, possibly in a further addendum to the Planning Statement.

5. Energy efficiency

WPC commented previously that there was no mention in the ARM documents regarding energy efficient measures. Taylor Wimpey gave a great deal of information on this matter in the February BLCF, detailing the installation of air heat pumps, triple glazing, solar panels etc. Perhaps this is a building regulations matter rather than planning but nonetheless it would be good to see some reference to it in the ARM documents, again possibly in a further addendum to the Planning Statement.

6. Ecology

WPC is pleased to see the firm commitments to produce targets and associated drawings (location and box design) for nest boxes for swifts, starlings and house sparrows and roosting boxes for bats (to include two pill boxes for bat roosts) as detailed in “Landscape and Ecology Management Plan

(LEMP)" within "Part 2: Environmental Action Plan".

7. Construction Method/Management Plan

The outline planning consent, condition 18, required a construction method/management statement. WPC do not currently have the expertise of planning consultants but it appears to us that there is some confusing crossover regarding the documents relied upon under this topic. Within the ARM/RMA application the amended "Part 2 of The Environment Action Plan" includes in section 4, a "Construction Environmental Management Plan (CEMP: Biodiversity)" This contains much detail of how the ecological features of the site will be protected during construction and is of course extremely important and welcome. But, it doesn't cover such matters as how will the building materials, lorries, diggers, etc. access the site, and how will the impact of this on Ipswich Rd and local residents be mitigated. A separate application, DC/21/5740/DRC | Discharge of Condition(s) 18 is currently before ESC. This contains a "Construction Environmental Management Plan Phase 1 Earthworks", this references the Construction Environmental Management Plan as in the above paragraph. It is also very detailed regarding the site management, hours of working, access/ingress (former quarry entrance) etc. etc. Waldringfield Parish Council 3 WPC will be responding to this DRC separately, but we do not understand why the Construction Environmental Management Plan Phase 1 Earthworks document is not included in the ARM/RMA, or at the very least, referenced in these applications.

8. Phasing & Timing

We have found no reference to time-frames in these ARMs – we would have thought this to be a critical element.

9. Previously submitted but undetermined ARMS

It has been explained at the BLCF of February 2022 that the ESC Planning Committee has already made a "resolution to grant" the extant ARMs but amendments put forward by Taylor Wimpey would be subject to consultation.

10. Design

A very comprehensive response to the revised documents has been made by the Principal Design and Conservation Officer– WPC has nothing to add to that.

11 Landscape & Arboriculture WPC's Tree Warden has provided a report which forms part of WPC's consultation response."

1 March 2022

"I have been examining available landscape drawings looking for any sign of changes to increase biodiversity of the proposals. The only new drawing relevant to landscape appears to be: JBA Soft Landscape Proposals 24.01.22 amended to new layout. This shows part of the east site. It does not have a schedule of plants but I assume this is the same as on the previous version and all planting appears as before.

My criticisms are:

1 Not enough trees: Canopy deficiency Small number of trees which are mostly narrowly fastigate trees offering little canopy. Tight planting of ornamental hedges round all housing necessitating frequent trimming. No groups of native trees and shrubs. The drawing only shows a part of the East site so I assume the remainder is unchanged.

2 No relevance to local species: biodiversity deficiency The planting schedule is all as before therefore all the comments I made in the response of 22/10/21 still apply. Please note that Taylor Wimpey 'Strategy' states: "All new sites have planting that provides food for local species throughout the seasons" as quoted in the document from ecologists SES Part 2 environmental action plan. This strategy is not complied with in that few of the planted species will provide food for native species.

Natural England comments

Also I would draw attention to the comments from Natural England which makes many of these points on page 2 of its letter of 11 October 2021, plus a lot more, under other advice, Landscaping, and which I wholly endorse. "2) Other advice Waldringfield Parish Council 2 In addition, Natural England would advise on the following issues. Landscaping The detailed landscape proposals indicate a large number of ornamental shrubs/trees which have little value for native wildlife. Ideally planting within residential areas would maximise benefits for biodiversity. Opportunities for enhancement might include: • Planting more trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds". This would require a re-think of the layout as in the current design no room is left for wildlife apart from narrow strips between hard areas. Biodiversity here seems to be providing a lot of boxes but little 'natural' habitat.

3 No trees or climbers within gardens and none (apparently) to be offered

In conclusion

The canopy effect will be very sparse even if all the trees grow to maturity. The 5m circles indicated would not be achieved with these narrow growing species so they are misleading. 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 few 'native species' included and these are clones or varieties not the native growing ones e.g. clones of field maple and birch. In all the plans are not relevant to current thinking regarding tree canopy to help modify climate and provide shade and belong in the days when stretches of massed ornamental shrubs were carpeted out in housing areas."

22 October 2021

"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.

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).

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.

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.

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.

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.

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.

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.

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.

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.

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.

Private gardens

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

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.

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.”

Consultee	Date consulted	Date reply received
Woodbridge Town Council	8 September 2021	7 October 2021
	13 September 2021	2 March 2022
	14 February 2022	

Summary of comments:

2 March 2022

“It was agreed to make No Comment on this application.”

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.”

Consultee	Date consulted	Date reply received
Bucklesham Parish Council	13 September 2021	4 November 2021 15 February 2022
Summary of comments: <u>15 February 2022</u> “No comment” <u>4 November 2021</u> “No comment”		

Consultee	Date consulted	Date reply received
Newbourne Parish Council	8 September 2021 13 September 2021 14 February 2022	No response
Summary of comments: No response.		

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)

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.
- 8.4. The details under considered in this submission relate to the following – as set out by the outline permission:
- **Appearance:** Aspects of a building or place which affect the way it looks, including the exterior of the development, including *the alignment, height and materials of all walls and fences and other means of enclosure*
 - **Landscaping:** The improvement or protection of the amenities of the site and the area and the surrounding area, including a landscape plan, proposed planting, the means of forming enclosures, the materials to be used for paved and hard surfaces and the finished levels in relation to existing levels, and means of future maintenance.
 - **Layout:** Includes buildings, roads, footpaths and cycleways, routes and open spaces within the development and the way they are laid out in relations to buildings and spaces outside the development.
 - **Scale:** Includes information on the size of the development, including the height, width and length of each proposed building, and density.

- **Other:** Character banding, access strategy, landscaping details, building materials, boundary treatment, recycling/bin storage, arboricultural impact and tree survey, earthworks strategy, details of estate roads and footpaths, surface water drainage and noise attenuation.

Building height and density

- 8.5. 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.
- 8.6. In response to these parameters, the submitted Building Heights Parameter Plan denotes the frontage of the Phase E1 site (adjacent to the Spine Road) falling under 'Height Zone 2', which can include buildings up to 2.5 storeys [with a maximum building height of +12.5m to ridge level above proposed ground level], with the rest of the parcel identified as 'Height Zone 1', which can include buildings up to 2 storeys [with a maximum building height of +11.0m to ridge level above proposed ground level]. Supplementary to this, the Residential Density Parameter Plan indicates a 'medium density' development for the frontage of the parcel - at 30-35 dwellings per hectare - with the rest of the parcel shown as 'low density' - between 20-30 dwellings per hectare. Responding to this framework, the majority of the proposed dwellings will be two-storeys in height, with dwellings fronting the Spine Road at 2.5 storeys.

Density

- 8.7. The principles of site-wide development densities were approved by a density parameter plan. In this particular location, development along the Spine Road frontage will comprise a higher density to provide a sense of enclosure, with other parts of the phase being slightly lower density. Overall, this particular phase will provide an average density of 27 dwellings per hectare.

Character

- 8.8. The approved Design and Access Statement and Character Banding Plan, provides guidelines for overall design ethos of each character area. In this instance, the Character Banding Plan identifies Phase E1 as relating to 'The Boulevard', 'Ipswich Road Edge' and 'Valley Corridor Edge' character areas. As prescribed, the character areas are defined by subtle variations in the building design, form and finishing materials as well as the urban grain and form, landscape treatments and planting. Distinctive patterns of building setbacks, frontages, architectural treatment, materials, and inter-relationship between public and private spaces are proposed to help the new homes sit within their surroundings and create legibility across the wider site.
- 8.9. In response, the frontage of the parcel that sits within The Boulevard character area, presents a contemporary architectural style, whilst the southern and western extents of the parcel is formed of a 'soft approach, comprising informal frontages with irregular rhythm and wider gaps' due to its setting against green corridors. The remaining core includes 'subtle material changes to create transition between the primary road and edges'.

Material palette

- 8.10. Proposed materials include a range of bricks, render and boarding and are applied in variations across each character area, with contemporary fenestration comprising grey uPVC windows that offer large, glazed openings - see submitted materials plan.

Layout

- 8.11. The proposed layout of the development is informed by the site's constraints and opportunities, in particular the surrounding landscape features, site edges and neighbouring phases (e.g., the all-through school to the east). The applicant notes that the layout is informed by the approved Parameter Plans and has evolved further following discussions with the local planning authority at pre-application stage.
- 8.12. East Suffolk Council's design and conservation team have reviewed the submission and have advised the following:

"As you know, I provided you with detailed comments on the original applications in November last year, following which we met with the agent to review them on December 7th 2021. Although supportive of the applications in general and in most detail, I did highlight specific areas of concern, where a minor revision was merited, and areas of omission that I judged needed addressed.

The current applications include the applicant's response – the submitted Planning Statement Addendum indicates so. I provided combined comments for each application, as they relate to a single parcel, and will do so here. I shall, therefore, provide you with comment here only on those matters of concern and omission that I drew your attention to originally. I shall omit any preamble as unnecessary.

Lack of streetscenes to the boulevard and school frontage

I note that we have now received a streetscene drawing for the boulevard frontage which is helpful. This is a key elevation to the SANG and illustrates the approach proposed to this part of the boulevard which is the principal route through the Brightwell Lakes development. The drawing shows that the frontage will have a uniform design approach in terms of housetypes, materials (red brick) and elevational treatments, including for the gabled plots. And that this frontage will contrast somewhat with the rest of the parcel (with its use of buff brick and white render). I consider this a positive approach, as it does enough to signal the key importance of the frontage to the SANG without compromising its integrity (or belonging) with the rest of the parcel behind. This is a successful outcome, but we wouldn't have known about it had we not asked for it to be illustrated. This drawing incorrectly shows a timber fence between plots 61 and 62 – the boundary treatment plan shows that this will be a 1.8m brick wall.

Lack of site sections

This original comment of mine has been addressed by the inclusion of a streetscene (D-D) which provides an illustration of the main access point into the parcel off the Ipswich Road access road. This – plus other streetscenes – does confirm what we were advised at our December meeting that the topography of this parcel does not include any significant slopes and is relatively level. The D-D streetscene is helpful and shows what I consider to be a pleasant, lower density layout of slightly dispersed character (that is, with good gaps between dwellings on the streetscene) and all of that is fine to go along with. What I do consider unfortunate, however, is the flank elevations of the same housetypes that present

onto this street – see plots 43, 109 and 112. I do find these kind of what I call ‘turn-out’ elevations depressing, by which I mean, no design consideration has gone into their appearance – the windows just appear where they suit the plan layout with no thought to whether the resultant elevation is attractive or not. I’m not sure why I should really have to point this out, frankly, but it’s the sort of indifferent streetscene effect we really want to avoid.

Front door designs

I note that the housetype designs have now been amended to include a more contemporary front door design that better relates to the character of the house designs across this parcel. Of course, the front door is a detail, only, but I welcome that this has been revised in response to my comments and the outcome is satisfactory.

Visitor parking provision

I note that the layout has been amended in relation to parking provision to comply with adopted standards (the County’s, I assume), including for visitors. This confirmation is welcome. The submitted parking plan clearly shows the visitor parking annotated and being on-street. There looks to be good provision for it pepper-potted throughout the layout.

Boundary treatments abutting roads

I note that the revised boundary strategy now includes for all boundaries abutting roads and forming part of the streetscene to now be brick walls (instead of fencing). This is very welcome and will enhance the design quality of the layout considerably. I have checked the submitted Boundary Treatment Plan and advise that we require the following further amendments to be made: 1.8m brick walls in place of timber fencing between plots 1 and 2; 61 and 62. Inclusion of knee rails – I note that the same revised boundary strategy now includes for the use of knee rails to provide a boundary between private drives or the back edge of footpaths along the SANG, bridle way and also the boulevard. This was a suggestion, only, that I had made having seen the same arrangement to good effect elsewhere and I welcome this addition to the design here, which will enhance it. I am uncertain, however, why these are shown to be in metal, when all other knee rails that I have seen used elsewhere are in more attractive timber – why not that here? Timber is much easier to repair when damaged, as these features easily are by reversing vehicles.

Materials schedule and specification

I have reviewed the submitted Materials Plan with particular focus on brick type specifications and those for roof coverings. I can confirm that these are acceptable and that some of the brick choices are of a particularly good quality – such as the Wienerberger, Forterra and Ibstock. I note that the drawing specifies these bricks and roof coverings with the caveat ‘or similar’. I understand the need to include such a caveat, due to materials supply issues that are still affecting the construction industry. We wouldn’t normally agree such an open-worded specification, but we will need to acknowledge some flexibility here.

Would it be possible to add an Informative to any consent to require agreement by exchange of correspondence (for the record) where any change in the specified material is proposed? This will allow us to then still have some control over final choices.

8.13. Following initial comments raised, the applicant has updated boundary treatment plans (E1-SP05 Rev. E) to amend the timber fence between Plots 1 and 2 and Plots 61 and 62 to brick walls. Additionally, the annotation on the plans have been amended to confirm that the knee rails will be timber, rather than metal.

8.14. The revisions to boundary treatments and knee rail materials are accepted. However, the elevational treatment is as an area of unresolved concern. Whilst the point about plan layout is acknowledged, there are other ways to enhance the appearance of an elevation using materials, details or other architectural treatments, to create interest.

Housing provision

8.15. The E1 parcel provides 119 dwellings, comprising a range of house types including one-bed maisonettes to detached five-bedroom homes.

Housing mix

8.16. The local plan identifies a need across all tenures for 41% of properties to be one- or two-bedroom dwellings. In this instance, 16 dwellings will be one- or two-bedroom units, equating to 13.5% - as shown in Table 1.

8.17. 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.

8.18. This is apparent when taking into account the provisions proposed by parcels W1 and W1a, which comprises a larger number of smaller units (49.2% are one- or two-bedroom dwellings).

Affordable housing

8.19. 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.

8.20. Of the total provision for this parcel, 34 dwellings (28.6%) would be affordable tenures – see Table 1. The materials and distribution of the affordable dwellings seek to ensure they are tenure blind and integrate successfully into the site. The location of the affordable dwellings across the site is illustrated on the Housing Mix and Tenure Plan.

8.21. Further discussion is required to address points of concern raised by the East Suffolk Council's housing enabling officer.

- 8.22. 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 E1

Phase E1 housing mix		Number of dwellings
Market	2-bed flat over garage	2
	2-bed house	4
	3-bed house	34
	4 bed house	34
	5-bed house	11
Affordable rent	1-bed maisonette	4
	3-bed house	4
	4-bed house	2
Intermediate rent	3-bed house	4
	4-bed house	3
Shared ownership	1-bed maisonette	2
	3-bed house	4
	4-bed house	2
Shared equity	1-bed maisonette	2
	2-bed flat over garage	2
	3-bed house	2
	4-bed house	3
Total affordable		34
Total market		85
Overall total		119

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%	6.7% (8 units)
2	29%	6.7% (8 units)
3	25%	40.4% (48 units)
4+	33%	46.2% (55 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

- 8.23. To accord with the requirements of Condition 14 (Environmental Action Plan) and Condition 15 (Environmental Statement) 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 Phase E1a, W1 and W1a.
- 8.24. 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.
- 8.25. 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).
- 8.26. 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.

- 8.27. 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.
- 8.28. 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

- 8.29. Suffolk County Council as the lead local flood authority have reviewed the following submitted documents and recommend approval, subject to conditions:
- Stantec, Technical Note, Surface and Foul Water Drainage Strategy for Phases E1 and E1A – Revision B, 332210596-2001-TN003B, 16/02/2022

Note: It should be noted that Table 2 of the above Technical Note contains some errors regarding infiltration rates. However, the correct rates are stated and used in supporting plans and calculations.

Highways

- 8.30. 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.
- 8.31. The primary access to this parcel is via Ipswich Road, with a secondary access created from the Spine Road. It will involve a combination of enhanced and improved points of entry, which were previously associated with the previous quarry activities. 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.

8.32. A parking and cycle strategy plan is included with this application, and has been designed in line with the requirements of the Suffolk Guidance for Parking – it incorporates the following features:

- Ensure vehicular parking is not a dominant feature in the public realm.
- Private drives provide access to small number of units along the green edges.
- Shared surfaces and private drives will have a pedestrian priority.
- Urban frontages along the primary roads provide appropriate scale, height and enclosure to address the importance of these streets.
- Streetscapes integrated with landscaping proposals to mitigate the visual impact of car parking.
- Provision of on-plot parking, or off-plot parking located in a manner that provides a close and visible relationship with the dwelling.
- Avoidance of parking courts wherever possible.

Public rights of way

8.33. 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.

8.34. 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.

8.35. The initial holding objection from the Highway Authority, along with comments raised in regard to the proposed design details, is yet to be fully resolved. 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

8.36. 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.

8.37. 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 E1. These are also supported by a Measured Works Schedule to ensure that the necessary planting and landscape works are undertaken correctly.

- 8.38. 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.
- 8.39. 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.

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 E1 of the development promotes a high-quality design that responds positively to the characteristics defined by established parameter and character plans. The scale, appearance, and layout of the proposal is considered policy compliant, with the aim of providing a well-integrated and sensitively designed scheme, in terms of connectivity and green infrastructure.
- 9.2. Whilst there are still outstanding comments to address and the fundamental component of the submitted scheme is considered acceptable.

10. Recommendation

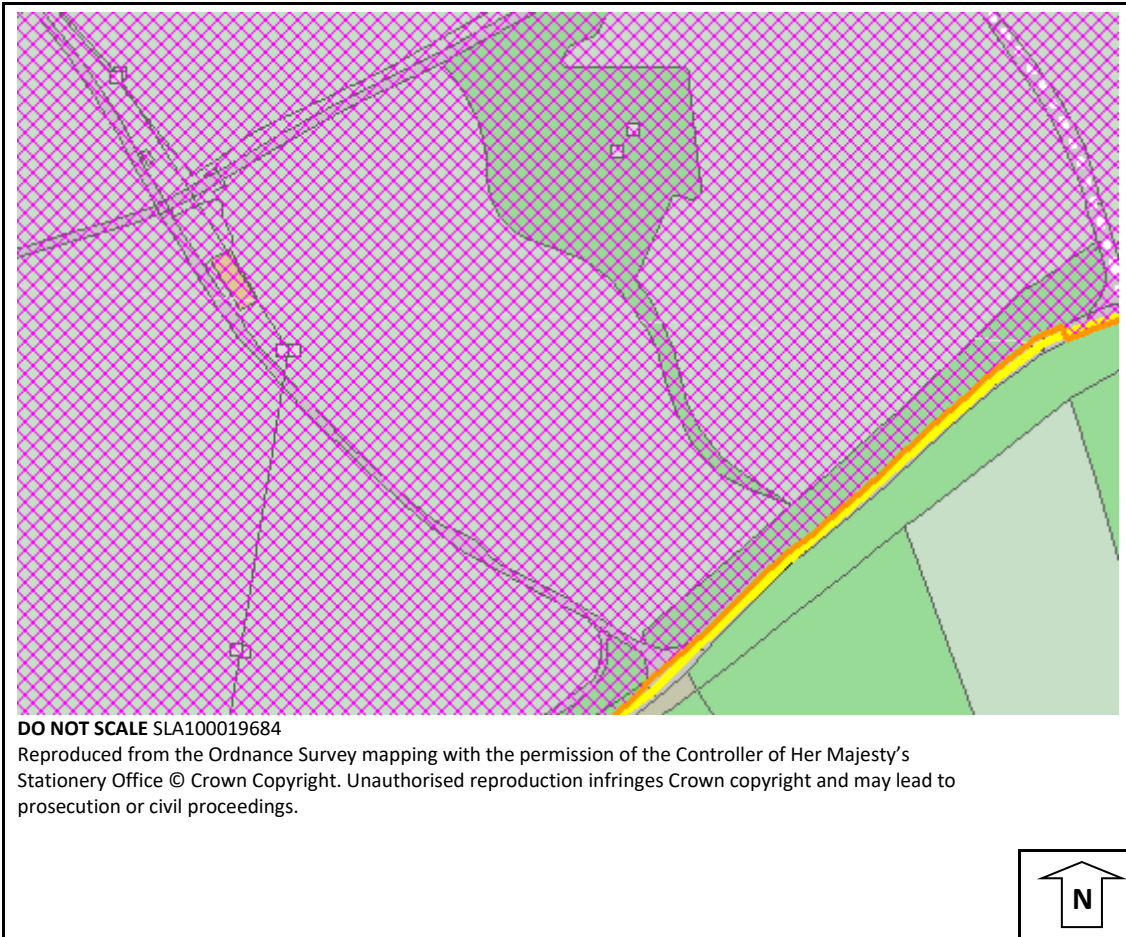
- 10.1. Authority to approve subject to all outstanding statutory holding objections and other matters being resolved, and agreement of conditions.

Conditions and informatives to be agreed upon receipt of all consultation responses and covered in the committee update sheet. However, based on the extent of conditions on the outline consent, conditions applied to the reserved matters application should be minimal.

Background information

See application reference DC/21/4004/ARM on [Public Access](#)

Map



Key



Notified, no comments received



Objection



Representation



Support