



East Suffolk House, Riduna Park, Station Road,
Melton, Woodbridge, Suffolk, IP12 1RT

Planning Committee South

Members:

Councillor Debbie McCallum (Chairman)
Councillor Stuart Bird (Vice-Chairman)
Councillor Chris Blundell
Councillor Tony Cooper
Councillor Tom Daly
Councillor Mike Deacon
Councillor Colin Hedgley
Councillor Mark Newton
Councillor Kay Yule

Members are invited to a **Meeting of the Planning Committee South**
to be held in the Deben Conference Room, East Suffolk House,
on **Tuesday, 26 July 2022 at 2.00pm**

This meeting will be broadcast to the public via the East Suffolk YouTube
Channel at <https://youtu.be/vLXO6ChXsCw>

An Agenda is set out below.

Part One – Open to the Public

Pages

1	Apologies for Absence and Substitutions
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2	Declarations of Interest Members and Officers are invited to make any declarations of interests, and the nature of that interest, that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the Meeting if it becomes apparent that this may be required when a particular item or issue is considered.	
3	Declarations of Lobbying and Responses to Lobbying To receive any Declarations of Lobbying in respect of any item on the agenda and also declarations of any response to that lobbying.	
4	Minutes To confirm as a correct record the Minutes of the Meeting held on 28 June 2022	1 - 15
5	East Suffolk Enforcement Action - Case Update ES/1230 Report of the Head of Planning and Coastal Management	16 - 36
6	DC/21/4002/ARM - Land to the South and East of Adastral Park ES/1231 Report of the Head of Planning and Coastal Management	37 - 100
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8	DC/21/5698/FUL - 60 Old Barrack Road, Woodbridge, IP12 4ER ES/1233 Report of the Head of Planning and Coastal Management	159 - 169
9	DC/22/1162/FUL - Woodside, Martlesham Road, Little Bealings, Woodbridge, IP13 6LX ES/1234 Report of the Head of Planning and Coastal Management	170 - 179
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11	DC/22/1996/FUL - Kiosk Site near Bent Hill, The Promenade, Undercliff Road West, Felixstowe, IP11 2AB ES/1236 Report of the Head of Planning and Coastal Management	189 - 195

There are no Exempt or Confidential items for this Agenda.

Close



Stephen Baker, Chief Executive

Speaking at Planning Committee Meetings

Interested parties who wish to speak will be able to register to do so, using an online form. Registration may take place on the day that the reports for the scheduled meeting are published on the Council's website, until 5.00pm on the day prior to the scheduled meeting.

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Interested parties permitted to speak on an application are a representative of Town / Parish Council or Parish Meeting, the applicant or representative, an objector, and the relevant ward Members. Interested parties will be given a maximum of three minutes to speak and the intention is that only one person would speak from each of the above parties.

If you are registered to speak, can we please ask that you arrive at the meeting **prior to its start time (as detailed on the agenda)** and make yourself known to the Committee Clerk, as the agenda may be re-ordered by the Chairman to bring forward items with public speaking and the item you have registered to speak on could be heard by the Committee earlier than planned.

Please note that any illustrative material you wish to have displayed at the meeting, or any further supporting information you wish to have circulated to the Committee, must be submitted to the Planning team **at least 24 hours** before the meeting.

For more information, please refer to the Code of Good Practice for Planning and Rights of Way, which is contained in the East Suffolk Council Constitution (<http://www.eastsuffolk.gov.uk/assets/Your-Council/East-Suffolk-Council-Constitution.pdf>).

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Unconfirmed



Minutes of a Meeting of the **Planning Committee South** held in the Deben Conference Room, East Suffolk House, Melton, on **Tuesday, 28 June 2022 at 2.00pm**

Members of the Committee present:

Councillor Stuart Bird, Councillor Chris Blundell, Councillor Tony Cooper, Councillor Colin Hedgley, Councillor Debbie McCallum, Councillor Mark Newton

Other Members present:

Councillor Ed Thompson

Officers present:

Nick Clow (Energy Projects Co-Ordinator), Karen Cook (Democratic Services Manager), Grant Heal (Planner), Matt Makin (Democratic Services Officer), Dominic Starkey (Assistant Enforcement Officer (Development Management)), Ben Woolnough (Planning Manager (Development Management))

Announcement

When opening the meeting, the Chairman announced that she had reordered the agenda to bring forward items with public speaking and that item 8 would be heard after item 5 and would be followed by item 7, before item 6 was heard.

1 Apologies for Absence and Substitutions

Apologies for absence were received from Councillors Tom Daly and Mike Deacon. Councillor Ed Thompson attended as Councillor Daly's substitute.

2 Declarations of Interest

No declarations of interest were made.

3 Declarations of Lobbying and Responses to Lobbying

No declarations of lobbying were made.

4 Minutes

On the proposition of Councillor Blundell, seconded by Councillor Newton it was by a unanimous vote

RESOLVED

That the Minutes of the Meeting held on 24 May 2022 be confirmed as a correct record and signed by the Chairman.

5 East Suffolk Enforcement Action - Case Update

The Committee received report **ES/1186** of the Head of Planning and Coastal Management, which was a summary of the status of all outstanding enforcement cases for East Suffolk Council where enforcement action had been sanctioned under delegated powers up until 19 May 2022. At that time there were 13 such cases.

The Chairman noted that the Assistant Enforcement Officer was in attendance and invited questions on the report.

The Assistant Enforcement Officer advised that he was not aware of any impact of a recent fire at the site on Sandy Lane, Martlesham in relation to ongoing enforcement action and would be visiting the site shortly to assess the current state of operations there and if any further enforcement action was required.

The Assistant Enforcement Officer confirmed that enforcement action had been commenced in respect of the site of the former Coes building in Hamilton Road, Felixstowe and that discussions had taken place with the landowner and their planning agent on appropriate action to address planning breaches on the site. The Planning Manager (Development Management) added that he understood an application had been made to restore the building and would confirm this with the Committee after the meeting.

There being no further questions the Chairman sought a proposer and seconder for the recommendation to note the report.

On the proposition of Councillor Hedgley, seconded by Councillor Cooper it was by a unanimous vote

RESOLVED

That the outstanding enforcement matters up to 19 May 2022 be noted.

8 DC/22/0915/FUL - 46 Dobbs Lane, Kesgrave, IP5 2PX

The Committee received report **ES/1189** of the Head of Planning and Coastal Management, which related to planning application DC/22/0915/FUL.

The application sought planning permission to retain a replacement outbuilding that had been constructed at 46 Dobbs Lane in Kesgrave. As the "minded to" decision of the case officer to approve the application was contrary to Kesgrave Town Council's recommendation of refusal, the application was presented to the Planning Referral Panel on 19 April 2022, in accordance with the Scheme of Delegation set out in the East Suffolk Council Constitution, and the Panel referred the application to the Committee for determination.

The Committee received a presentation from the Energy Projects Co-ordinator, who was the case officer for the application.

The site's location was outlined and the Committee was shown aerial photographs of the host dwelling. The Energy Projects Co-ordinator noted that the rear garden of the property looped towards the front of the host dwelling, which was considered a unique feature of the streetscene.

The Committee received photographs of street views of the site looking towards the principal elevation and along Main Road, along with the existing block plan and elevations.

Photographs of the site prior to development were displayed to the committee. The Energy Projects Co-ordinator noted that what had been on the site was not dissimilar to what it had been replaced with and considered that the new development was an improvement.

The material planning considerations and key issues were summarised as design quality/materials, residential amenity and the Kesgrave Neighbourhood Plan.

The recommendation to approve the application, as set out in the report, was outlined to the Committee.

There being no questions to the officers the Chairman invited Councillor Gibson, representing Kesgrave Town Council, to address the Committee.

Councillor Gibson considered that the photographs displayed during the officer's presentation illustrated that the new development was bigger in scale than what it had replaced. Councillor Gibson acknowledged that the previous shed and fencing had not been appropriate for the area and had it been subject to a planning application, Kesgrave Town Council would have objected to it.

Councillor Gibson said that Kesgrave Town Council had been minded to object to the application on the principle of development as it was development in a front garden which contravened the essential open plan design of Kesgrave, which was the Town Council's duty to preserve and had been enshrined in the Kesgrave Neighbourhood Plan.

Councillor Gibson considered that in isolation the design of the development was immaterial as the principle of development was the key issue. Councillor Gibson noted the comments made by officers in relation to other dwellings on Dobbs Lane having outbuildings or garages in their front gardens and noted that this was a very limited amount, which had also been designed and built out in a way that was sympathetic to their host dwellings and had also been softened through vegetation boundary planting.

In respect of the three neighbours in support of the application Councillor Gibson countered that an overwhelming majority of residents had voted in favour of the Kesgrave Neighbourhood Plan, which sought to promote the retention of the open plan nature of Kesgrave. Councillor Gibson concluded that Kesgrave Town Council was

of the view that what had been built was not suitable for a front garden in the area, regardless of what it had replaced, and urged refusal of the application.

The Chairman invited questions to Councillor Gibson.

Councillor Gibson did not consider what had been built to be similar to the other outbuildings and garages in the front gardens of properties in Dobbs Lane.

In response to a query on the location of Dobbs Lane in 'old' Kesgrave, Councillor Gibson stated that the area could still be considered as open plan, despite the small boundary hedges and fences, adding that the Kesgrave Neighbourhood Plan applied to the whole of Kesgrave.

The Chairman invited Mr Willingham, the applicant, to address the Committee.

Mr Willingham thanked the Committee for the opportunity to participate in the process and clarify some points; he explained that the intent of the redevelopment had been to smarten up the area and improve the use of space on the site.

Mr Willingham advised that having sought the agreement of his immediate neighbours he worked with a builder to convert the existing sheds on the site into a single outbuilding, reducing the brick shed's height to make the roof continuous. Mr Willingham added that existing brickwork had been used to join the outbuilding to the host dwelling, at additional cost.

Mr Willingham said that his neighbours had been pleased with the resulting development and his adjoining neighbours had commented on both the improved appearance and the positive impact on the visibility from their driveway. Mr Willingham added that he had plans to plant vegetation on the boundary to soften the impact; this was originally put on hold as construction was completed in the winter and had not been undertaken pending the outcome of this planning application. Mr Willingham confirmed that should the application be approved then the planting would take place.

Mr Willingham noted that if the application was refused and he was required to restore what was originally on the site, it would still be an outbuilding on the site and would not look significantly different than what was currently in place. Mr Willingham thanked the Planning officers for their positive comments and recommendation to approve the application.

The Chairman invited questions to Mr Willingham.

Mr Willingham confirmed that he did consider constructing the development with materials to blend the outbuilding with the existing structures but had considered this would make the outbuilding stand out more due to the large surface area of brick it would have created. Mr Willingham noted that the outbuilding had been orientated to minimise its impact on the streetscene and the replacement fence was lower than the original fence.

Mr Willingham stated that the purpose of the development had been to create storage for garden furniture and provide a patio area for amenity space.

Mr Willingham, in response to a question on why he had applied for planning permission retrospectively, highlighted that the development had been undertaken during the COVID-19 lockdown and added that he had been of the view that he was replacing like for like and could therefore undertake the development through permitted development rights. Mr Willingham admitted that in hindsight he should have sought planning permission first.

The Chairman invited the Committee to debate the application that was before it.

Councillor Blundell said he was familiar with the area as he had previously lived there for several years; he described the area as being wide and open and considered what had been constructed fitted in with its surrounding and did not cause any demonstrable harm. Councillor Blundell noted the retrospective nature of the application but did not see any reason to refuse it. Councillors Hedgley and Thompson both concurred with Councillor Blundell's statement.

Councillor Cooper expressed concern at the retrospective nature of the application and asked how this sort of issue could be addressed. In reply, the Planning Manager (Development Management) noted that an application could not be penalised for being retrospective and such applications had to be treated the same as those applications made prior to development. The Planning Manager also gave an example of where a retrospective application had been refused and that following the dismissal of the subsequent appeal to the Planning Inspectorate, the applicant had been required to demolish what had been constructed and restore what had originally been on the site.

Councillor Newton sought guidance on the weight that should be given to the Kesgrave Neighbourhood Plan and its policy on the open plan nature of Kesgrave. The Planning Manager referred to the information set out in the report and noted that this particular area of Kesgrave could not be truly considered as open plan as it contained fencing and hedges on curtilage boundaries and had a number of outbuildings at the front of the curtilage. The Planning Manager said that on balance, officers were of the view that the openness in the area was not impacted upon by the development.

Councillor McCallum stated that whilst she sympathised with the views of Kesgrave Town Council and was not keen on retrospective applications, she could see no material reason to refuse the application and would, reluctantly, be voting in favour of it.

There being no further debate, the Chairman sought a proposer and a seconder for the recommendation to approve the application set out in the report. On the proposition of Councillor Cooper, seconded by Councillor Blundell it was by a unanimous vote

RESOLVED

That the application be **APPROVED**.

Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.

7 DC/22/1162/FUL - Woodside, Martlesham Road, Little Bealings, Woodbridge, IP13 6LX

The Committee received report **ES/1188** of the Head of Planning and Coastal Management, which related to planning application DC/22/1162/FUL.

The application sought planning permission to construct a 4-bay cart lodge with studio above at Woodside, Martlesham Road, Little Bealings, IP13 6LX. As the "minded to" decision of the case officer to approve the application was contrary to Little Bealings Parish Council's recommendation of refusal, the application was presented to the Planning Referral Panel on 24 May 2022, in accordance with the Scheme of Delegation set out in the East Suffolk Council Constitution and the Panel referred the application to the Committee for determination.

The Committee received a presentation from the Energy Projects Co-ordinator, who was the case officer for the application.

The site's location was outlined and the Committee was shown aerial photographs of the site which indicated the locations of both the host dwelling and the cart lodge.

The Committee received photographs demonstrating views looking north towards the host dwelling, looking west and east along Martlesham Road, views into the site showing the relationship between the host dwelling and the cart lodge and views of the wider streetscene.

The Energy Projects Co-ordinator provided details of the consented scheme on the site which had been approved under planning application DC/17/3824/FUL, noting that what had been approved was slightly smaller than what had been constructed and removed an external staircase. The Committee was shown the existing elevations to demonstrate these changes, along with the existing block plan.

The Committee was advised that there was extant consent for an extension to the host dwelling, approved under planning application DC/21/4162/FUL. The Energy Projects Co-ordinator explained that part of the justification for the recommendation to approve this application was that once this extant consent was built out, the cart lodge would be subordinate to the host dwelling.

The Committee was shown the proposed block plan for the approved extension in relation to the constructed cart lodge.

The recommendation to approve the application, as set out in the report, was outlined to the Committee. The Energy Projects Co-ordinator highlighted that a condition was

proposed to secure the replacement of trees that would be lost as part of the development.

The Chairman invited questions to the officers.

The Energy Projects Co-ordinator advised that should the extant consent for the extension not be built out he would still consider that the cart lodge would be subordinate to the host dwelling, although this justification would be weaker.

The Planning Manager (Development Management) noted that the term cart lodge was generally used for larger garages and that traditionally, a cart lodge had open bays and a more traditional appearance. The Planning Manager considered that the term was more generally used to describe the style of an outbuilding than if it had open bays or not.

In response to a question on a possible application adjacent to the site for two new dwellings, the Planning Manager advised later in the meeting that an application had been received and been refused.

The Chairman invited Councillor Hedgley, who was also Ward Member for Little Bealings, to address the Committee.

Councillor Hedgley gave apologies for Little Bealings Parish Council, who had been unable to send a representative to speak at the meeting. Councillor Hedgley read out a statement he had received from the Chairman of Little Bealings Parish Council, which stated the Parish Council's resolution to object to the application.

Little Bealings Parish Council's statement considered the separate electricity and water supply to the cart lodge to be against policy SCLP5.7 of the Local Plan regarding infill and garden development and that the position, size, design and materials used had resulted in a development that was harmful to the character of the area, the neighbouring property and the streetscene.

Little Bealings Parish Council's statement suggested that the Committee visit the site to demonstrate the intrusiveness of the development and said it was disappointing that the full effect of the development upon the streetscene could not be observed whilst the trees were in full leaf.

Councillor Hedgley added to this statement, being cognisant to the fact the application was retrospective and expressing concern that an experienced developer had not sought planning permission in advance of developing what had been constructed.

Councillor Hedgley highlighted that what had been constructed was larger than what had been consented of the site and had a different roof, adding that the impact of the development could not be assessed whilst the trees were in full leaf.

Councillor Hedgley stated that neighbours of the site were fearful of the planned development in the area and proposed that the Committee defer the application in order to visit the site to fully understand the effect of the development on the

streetscene. The proposal was seconded by Councillor McCallum and it was by a majority vote

RESOLVED

That the application be **DEFERRED** to allow the Committee to visit the site to fully understand the effect of the development on the streetscene.

The Chairman advised that a date and time for the site visit would be confirmed after the meeting.

6 DC/21/5748/FUL - 10-12 Market Hill, Woodbridge, IP12 4LU

The Committee received report **ES/1187** of the Head of Planning and Coastal Management, which related to planning application DC/21/5748/FUL.

The application sought planning permission for the erection of one new market dwelling on land to the rear of 10 and 12 Market Hill, Woodbridge. As the "minded to" decision of the case officer to approve the application was contrary to Woodbridge Town Council's recommendation of refusal, the application was presented to the Planning Referral Panel on 16 June 2022, in accordance with the Scheme of Delegation set out in the East Suffolk Council Constitution. The Panel referred the application to the Committee for the determination so Members could debate the merits of the application.

The Committee received a presentation from the Planner, who was the case officer for the application.

The site's location was outlined and an aerial photograph of the site was displayed.

The Committee received photographs demonstrating views of the site entrance and looking into the site from the rear. The Planner highlighted the listed properties and curtilage boundary wall neighbouring the site entrance.

The Committee was shown the existing and proposed block plans; some of the trees on the site were proposed to be removed and replacement tree planting would be secured by condition. The Council's Arboriculture and Landscape Officer had not objected to the application.

The proposed floor plan and the existing and proposed elevations were displayed. The Planner outlined the design proposed feature a pitched roof which would step down in line with the gradient of the site. The upper portion would be clad in a black corrugated sheet metal, with the lower portion being encased in corten steel. The street facing elevation would be a perforated screen to conceal the courtyard that would be created for the property.

Drawings for the concealed courtyard were displayed and the Planner detailed how the concealment would be achieved.

The recommendation to approve the application, as set out in the report, was outlined to the Committee.

The Chairman invited questions to the officers.

The Planner advised that the proposed condition to secure a construction management plan did not explicitly state that a banksman would be required for vehicle movements, but considered that the scope of the development would require one. The Planning Manager (Development Management) added that the wording of this proposed condition could be strengthened should the Committee wish to do so and explained that the Council was not able to resist development on the grounds that construction management may be complicated.

The Planner confirmed that one of the entrances to Woodbridge School was located on the opposite side of Market Hill to the application site.

In response to a question on the selection of the materials to be used, given that the proposed development would be within a conservation area, the Planner outlined that the design was a result of negotiations with the applicant and their agent during the pre-application process to refine the design and select suitable materials.

The Committee was advised that corten steel had been selected as it reflected light in the same way red brick would and the black cladding mirrored similar cladding in the immediate area. The Planner noted that the Council's Design and Conservation team's most recent response on the application stated that it considered the design did preserve and enhance the conservation area. The Planning Manager added that contemporary designs were common in conservation areas and cited similar designs and materials to what was proposed in the Aldeburgh conservation area.

The Planner highlighted that officers had resisted plans to remove part of the listed curtilage wall to create a vehicular access to the site and officers considered the lack of any parking provision to be acceptable given the site's sustainable location in close proximity to Woodbridge town centre, which was within walking distance to alternative forms of transport.

There being no public speaking on the application, the Chairman invited the Committee to debate the application that was before it.

Councillor McCallum understood the comments on the materials selected but was not concerned by this aspect of the development; her concern related to the construction traffic and asked that should the application be approved by the Committee, the discharge of conditions application be brought to the Chairman and Vice-Chairman of the Committee for approval.

The Planning Manager advised that any discharge of conditions application condition could be shared with the Chairman and Vice-Chairman of the Committee but this could not be explicitly conditioned in any planning permission granted for this application. The Planning Manager advised that the condition to secure a construction management plan could be strengthened by the Committee to set out specific engagement with the Highways Authority on its discharge.

Councillor Bird was content for the Chairman and Vice-Chairman to be apprised of any discharge of conditions application. Councillor Bird stated that was concerned about the impact of the materials selected on the conservation area and that alien materials could be introduced to the area that did not protect and enhance it. Councillor Bird stated that he remained of an open mind on this aspect of the application.

Councillor Cooper queried if tree roots would be protected during the development. The Planner advised that the principal tree on the site would be retained and that replacement planting for the trees that would be lost, which considered to be of poor quality, would be secured by condition. The Planning Manager added that an arboricultural statement to protect the retained trees would also be secured by condition.

Following further debate on construction traffic, the Planning Manager advised that should it wish to do so, the Committee could resolve to delegate authority to approve the application to the Head of Planning and Coastal Management, subject to the proposed conditions and the enhancement of condition 16 (construction management plan) being approved by the Chairman and Vice-Chairman of the Committee.

Councillor Hedgley was content with the design and material aspects of the application but considered that the objections from eight neighbours and Woodbridge Town Council should be considered. Councillor Hedgley also acknowledged the concerns raised about construction traffic and noted that it would be the developer's responsibility to notify the Highways Authority should any road closures be required. Councillor Hedgley said that on balance, he was reluctantly in support of the application.

There being no further debate, Councillor McCallum proposed that authority to approve the application be delegated to the Head of Planning and Coastal Management, subject to the proposed conditions and the enhancement of condition 16 (construction management plan) being approved by the Chairman and Vice-Chairman of the Committee. This was seconded by Councillor Cooper and it was by a unanimous vote

RESOLVED

That **AUTHORITY TO APPROVE** the application be delegated to the Head of Planning and Coastal Management, subject to the conditions below and the enhancement of condition 16 (construction management plan) being approved by the Chairman and Vice-Chairman of the Committee.

Conditions:

1. The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission.

Reason: This condition is imposed in accordance with Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall not be carried out other than in complete accordance with the following approved drawing(s):

- 08 Rev. N (Proposed plans);
- 09 Rev. N (Proposed elevations);
- 10 Rev. I (Proposed site plan);
- 11 Rev. H (Proposed roof block plan);
- 01 Rev. A (Location plan).

Reason: For avoidance of doubt as to what has been considered and approved.

3. The materials and finishes shall be as indicated within the submitted application and thereafter retained as such, unless otherwise agreed by the Local Planning Authority.

Reason: To ensure the satisfactory appearance of the development in the interests of visual amenity.

4. No development (including any construction, demolition, site clearance or removal of underground tanks and relic structures) approved by this planning permission, shall take place until a detailed remediation method statement (RMS) has been submitted to, and approved in writing by, the LPA. The RMS must include, but is not limited to:

- details of all works to be undertaken including proposed methodologies, drawings and plans, materials, specifications and site management procedures;
- an explanation, including justification, for the selection of the proposed remediation methodology(ies);
- proposed remediation objectives and remediation criteria; and
- proposals for validating the remediation and, where appropriate, for future maintenance and monitoring.

The RMS must be prepared by a competent person and conform to current guidance and best practice, including the Land Contamination Risk Management (LCRM).

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

5. Prior to any occupation or use of the approved development the RMS approved under condition 4 must be completed in its entirety. The LPA must be given two weeks written notification prior to the commencement of the remedial works.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

6. A validation report must be submitted to and approved in writing by the LPA prior to any occupation or use of the approved development. The validation report must include, but is not limited to:

- results of sampling and monitoring carried out to demonstrate that the site remediation criteria have been met;

- evidence that any RMS approved in pursuance of conditions appended to this consent has been carried out competently, effectively and in its entirety; and
- evidence that remediation has been effective and that, as a minimum, the site will not qualify as contaminated land as defined by Part 2A of the Environmental Protection Act 1990.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

7. In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. No further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety.

An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and conform with prevailing guidance (including BS10175:2011+A2:2017 and the Land Contamination Risk Management (LCRM)) and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority.

Where remediation is necessary a detailed remediation method statement (RMS) must be prepared, and is subject to the approval in writing of the Local Planning Authority. The RMS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The approved RMS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works.

Following completion of the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation must be submitted to and approved in writing by the LPA.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

8. The use shall not commence until the area(s) within the site shown on Drawing No. 08, Rev. K for the purposes of secure cycle storage has been provided and thereafter the area(s) shall be retained, maintained, and used for no other purposes.

Reason: To ensure that sufficient areas for secure cycle storage are provided in accordance with Suffolk Guidance for Parking (2019) to promote sustainable travel.

9. Before the development is commenced, details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway including any system to dispose of the water. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway. This needs to be a pre-commencement condition to avoid expensive remedial action which adversely impacts on the viability of the development if, given the limitations on areas available, a suitable scheme cannot be retrospectively designed and built.

10. The areas to be provided for the storage and presentation for collection/emptying of refuse and recycling bins as shown on Drawing No. 08, Rev. K shall be provided in their entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

11. No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

12. No materials, plant or machinery shall be brought on to the site, until a full Arboricultural Method Statement including a comprehensive suite of tree protection measures to BS.5837 standard has been submitted to and approved by the Local Planning Authority. Thereafter, the development shall be constructed in strict accordance with approved methodology with all protection measures installed around all retained trees and hedgerows.

All protective fencing shall be retained and maintained until the development is complete and at no time shall there be any materials, plant or equipment stored, or building or excavation works of any kind undertaken, beneath the canopies of the trees and hedges unless otherwise approved.

Reason: To protect the trees/hedgerow during the course of development in the interest of visual amenity.

13. None of the trees or hedges shown to be retained on the approved plan shall be lopped, topped, pruned, uprooted, felled, wilfully damaged or in any other way destroyed or removed without the prior written consent of the Local Planning Authority. Any trees or hedges removed, dying, being severely damaged or becoming seriously diseased within five years of the completion of the development shall be replaced during the first available planting season, with trees or hedges of a size and

species, which shall previously have been agreed in writing by the local planning authority.

Reason: To safeguard the contribution to the character of the locality provided by the trees and hedgerow.

14. Within 3 month(s) of commencement of development, precise details of a scheme of landscape works (which term shall include tree and shrub planting, grass, earthworks, driveway construction, parking areas patios, hard surfaces etc, and other operations as appropriate) at a scale not less than 1:200 shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that there is a well laid out landscaping scheme in the interest of visual amenity.

15. The approved landscaping and planting works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as the Local Planning Authority may allow) and shall thereafter be retained and maintained. Any plant material removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the next available planting season and shall thereafter be retained and maintained.

Reason: To ensure the submission and implementation of a well-laid out scheme of landscaping in the interest of visual amenity.

16. No development shall commence until a detailed method of construction statement has been submitted to and approved by the Local Planning Authority. This statement shall set out hours of construction/activity on site, the location of parking areas for construction vehicles and delivery hours for materials and equipment to the site before and during construction. Thereafter the approved construction statement shall be adhered to throughout the construction of the development.

Reason: To reduce the potential impacts of noise pollution and additional vehicular movements in this area of Chapel Street during the construction phase of the development.

Informatives:

1. The Design and Access statement includes a section on Rainwater Harvesting for WC, irrigation, washing machine and an outside tap.

Water used for domestic purposes, but not provided by a regulated Water Undertaker, is regulated under the Private Water Supplies Regulations 2016 (as amended).

The term 'domestic purposes' is defined in section 218 of the Water Industry Act 1991, as drinking, washing, cooking, central heating and sanitary purposes. The term 'sanitary purposes' includes washing/bathing/showering, laundry and toilet flushing.

Therefore, if the development is to include the use of a Rainwater Harvesting System for domestic purposes advice should be sought from the Environmental Protection

Team prior to commencing works. All works undertaken must comply with the Private Water Supplies Regulations 2016 (as amended).

If you have any questions relating to this consultation response, please email ep@eastsuffolk.gov.uk, quoting "our reference" listed above, and an Officer will do their best to assist you.

The meeting concluded at 3.14pm.

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Chairman

PLANNING COMMITTEE SOUTH

Title of Report:

East Suffolk Enforcement Action – Case Update

Meeting Date

26 July 2022

Report Author and Tel No

Mia Glass
01502 523081

Is the report Open or Exempt?

Open

REPORT

The attached is a summary of the status of all outstanding enforcement cases for East Suffolk Council where enforcement action has either been sanctioned under delegated powers or through the Committee up until 27 June 2022. At present there are 16 such cases.

Information on all cases has been updated at the time of preparing the report such that the last bullet point in the status column shows the position at that time. Officers will provide a further verbal update should the situation have changed for any of the cases.

Members will note that where Enforcement action has been authorised the Councils Solicitor shall be instructed accordingly, but the speed of delivery of response may be affected by factors which are outside of the control of the Enforcement Service.

RECOMMENDATION

That the outstanding enforcement matters up to 27 June 2022 be noted.

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
EN08/0264 & ENF/2013/0191	15/01/2010	North	Pine Lodge Caravan Park, Hazels Lane, Hinton	Erection of a building and new vehicular access; Change of use of the land to a touring caravan site (Exemption Certificate revoked) and use of land for the site of a mobile home for gypsy/traveller use. Various unauthorised utility buildings for use on caravan site.	<ul style="list-style-type: none"> • 15/10/2010 - EN served • 08/02/2010 - Appeal received • 10/11/2010 - Appeal dismissed • 25/06/2013 - Three Planning applications received • 06/11/2013 – The three applications refused at Planning Committee. • 13/12/2013 - Appeal Lodged • 21/03/2014 – EN's served and become effective on 24/04/2014/ 04/07/2014 - Appeal Start date - Appeal to be dealt with by Hearing • 31/01/2015 – New planning appeal received for refusal of Application DC/13/3708 • 03/02/2015 – Appeal Decision – Two notices quashed for the avoidance of doubt, two notices upheld. Compliance time on notice relating to mobile home has been extended from 12 months to 18 months. • 10/11/2015 – Informal hearing held 	30/09/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • 01/03/2016 – Planning Appeal dismissed • 04/08/2016 – Site re-visited three of four Notices have not been complied with. • Trial date set for 21/04/2017 • Two charges relating to the mobile home, steps and hardstanding, the owner pleaded guilty to these to charges and was fined £1000 for failing to comply with the Enforcement Notice plus £600 in costs. • The Council has requested that the mobile home along with steps, hardstanding and access be removed by 16/06/2017. • 19/06/2017 – Site re-visited, no compliance with the Enforcement Notice. • 14/11/2017 – Full Injunction granted for the removal of the mobile home and steps. • 21/11/2017 – Mobile home and steps removed from site. 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> Review site regarding day block and access after decision notice released for enforcement notice served in connection with unauthorised occupancy /use of barn. 27/06/2018 – Compliance visit conducted to check on whether the 2010. 06/07/2018 – Legal advice being sought. 10/09/2018 – Site revisited to check for compliance with Notices. 11/09/2018 – Case referred back to Legal Department for further action to be considered. 11/10/2018 – Court hearing at the High Court in relation to the steps remain on the 2014 Enforcement Notice/ Injunction granted. Two months for compliance (11/12/2018). 01/11/2018 – Court Hearing at the High Court in relation to the 2010 Enforcement Notice. Injunctive 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<p>remedy sought. Verbal update to be given.</p> <ul style="list-style-type: none"> • Injunction granted. Three months given for compliance with Enforcement Notices served in 2010. • 13/12/2018 – Site visit undertaken in regards to Injunction served for 2014 Notice. No compliance. Passed back to Legal for further action. • 04/02/2019 –Site visit undertaken to check on compliance with Injunction served on 01/11/2018 • 26/02/2019 – case passed to Legal for further action to be considered. Update to be given at Planning Committee • High Court hearing 27/03/2019, the case was adjourned until the 03/04/2019 • 03/04/2019 - Officers attended the High Court, a warrant was issued due to non-attendance and failure to provide medical evidence explaining the non- 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<p>attendance as was required in the Order of 27/03/2019.</p> <ul style="list-style-type: none"> • 11/04/2019 – Officers returned to the High Court, the case was adjourned until 7 May 2019. • 07/05/2019 – Officers returned to the High Court. A three month suspended sentence for 12 months was given and the owner was required to comply with the Notices by 03/09/2019. • 05/09/2019 – Site visit undertaken; file passed to Legal Department for further action. • Court date arranged for 28/11/2019. • 28/11/2019 - Officers returned to the High Court. A new three month suspended sentence for 12 months was given and the owner was required to comply in full with the Injunctions and the Order of the Judge by 31/01/2020 • Site visited. Case currently with the Council's Legal Team for assessment. 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> Charging orders have been placed on the land to recover costs. 	
EN/09/0305	18/07/2013	South	Park Farm, Chapel Road, Bucklesham	Storage of caravans	<ul style="list-style-type: none"> Authorisation granted to serve Enforcement Notice. 13/09/2013 -Enforcement Notice served. 11/03/2014 – Appeal determined – EN upheld Compliance period extended to 4 months 11/07/2014 – Final compliance date 05/09/2014 – Planning application for change of use received 21/07/2015 – Application to be reported to Planning Committee for determination 14/09/2015 – site visited, caravans still in situ, letter sent to owner requesting their removal by 30/10/2015 11/02/2016 – Site visited, caravans still in situ. Legal advice sought as to further action. 09/08/2016 – Site re-visited, some caravans re-moved but 20 still in situ. Advice to be sought. 	July 2023

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • Further enforcement action to be put on hold and site to be monitored • Review in January 2019 • 29/01/2019 – Legal advice sought; letter sent to site owner. • 18/02/2019 – contact received from site owner. • 04/04/2019 – Further enforcement action to be placed on hold and monitored. • Review in April 2021. • 13/04/2021 – Letter sent to owner to establish current situation • Given until the end of June to either comply or supply the Council with any other information • Case being reviewed. • 22/05/2021 – contact received from site owner. Case reviewed • Due to the receipt of confidential information formal action has been placed on hold. • 06/07/2021 – Further enforcement action to be placed on hold and monitored, not expedient at 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					present to pursue. Review in two years.	
ENF/2014/0104	16/08/2016	South	Top Street, Martlesham	Storage of vehicles	<ul style="list-style-type: none"> • 23/11/2016 – Authorisation granted to serve an Enforcement Notice • 22/03/2017 – Enforcement Notice served. Notice takes effect on 26/04/2017. Compliance period is 4 months. • 17/07/2017 – Enforcement Notice withdrawn and to be re-served • 11/10/2017 – Notice re-served, effective on 13/11/2017 – 3 months for compliance • 23/02/2018 – Site visited. No compliance with Enforcement Notice. Case to be referred to Legal Department for further action. • Notice withdrawn • 09/07/2018 – Notice reserved, compliance date 3 months from 06/08/2018 (expires 06/11/2018) 	28/06/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • 01/10/2018 – PINS has refused to accept Appeal as received after the time limit. • Time for compliance is by 06/12/2018 • Site visit to be completed after the 06/12/2018 to check for compliance with the Notice • 07/12/2018 – Site visit completed, no compliance, case passed to Legal for further action. • 17/01/2019 – Committee updated that Enforcement Notice has been withdrawn and will be re-served following advice from Counsel. • 21/02/2019 – Authorisation granted by Committee to serve an Enforcement Notice. Counsel has advised that the Council give 30 days for the site to be cleared before the Notice is served. • 01/04/2019 – Enforcement Notice served. • 28/05/2019 – Enforcement Appeal has been submitted to the Planning Inspectorate. 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • Start date has now been received, Statements are due by 12/12/2019. • Awaiting Planning Inspectorate Decision • Appeal Dismissed with variations. Compliance by 20 January 2021 • Site visit due at end of January 2021. • 24/02/2021 – Visit conducted, some compliance, extension agreed until 24/05/2021 • 03/06/2021 – site re visited, no compliance, case passed to Legal Department for further action to be considered. • Legal action being considered. • Case to be heard at Court on 15/10/2021 • Court Case adjourned until 12/11/2021 • Court case adjourned for trial on 24/01/2022 • Court case adjourned until 01/02/2022 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> Owners and Tenant pleaded guilty to the charges and were fined £2000 and £1000 respectively plus costs. The majority of the site has now been cleared with the rest to be done by mid May 2022. 13/06/2022 – Site visited, Enforcement Notice has now been complied with in full. Case closed 	
ENF/2016/0292	11/08/2016	South	Houseboat Friendship, New Quay Lane, Melton	Change of use of land	<ul style="list-style-type: none"> 11/08/2016 – Authorisation granted to serve Enforcement Notice with an 8 year compliance period. Enforcement Notice to be drafted Enforcement Notice served on 20/10/2016, Notice effective on 24/11/ 2016 – 8 year compliance period (expires 24/11/2024). 	24/11/2024
ENF/2017/0170	21/07/2017	North	Land Adj to Oak Spring, The Street, Darsham	Installation on land of residential mobile home, erection of a structure, stationing of containers and portacabins	<ul style="list-style-type: none"> 16/11/2017 – Authorisation given to serve EN. 22/02/2018 – EN issued. Notice comes into effect on 30/03/2018 and has a 4 month compliance period 	31/07/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • Appeal submitted. Awaiting Start date • Appeal started, final comments due by 08/02/2019. • Waiting for decision from Planning Inspectorate. • 17/10/2019 – Appeal Decision issued by PINS. Enforcement Notice relating to the Use of the land quashed and to be re-issued as soon as possible, Notice relating to the operational development was upheld with an amendment. • 13/11/2019 – EN served in relation to the residential use of the site. Compliance by 13/04/2020 • Site visited. Case conference to be held • Appeal received in relation to the EN for the residential use • Appeal started. Statement submitted for 16th June 2020 • Awaiting Planning Inspectorate Decision 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • Appeal dismissed with some amendments. Compliance by 11/12/2020 • Site visit to be undertaken after 11/12/20 • Site visited, no compliance with Enforcement Notices, case passed to Legal Department for further action. • Further visit to be done on 25/03/2021. • Site visit completed, Notices not complied with, file passed to Legal services for further action. 	
ENF/2015/0279/DEV	05/09/2018	North	Land at Dam Lane Kessingland	Erection of outbuildings and wooden jetties, fencing and gates over 1 metre adjacent to highway and engineering operations amounting to the formation of a lake and soil bunds.	<ul style="list-style-type: none"> • Initial complaint logged by parish on 22/09/2015 • Case was reopened following further information on the 08/12/2016/ • Retrospective app received 01/03/2017. • Following delays in information requested, on 20/06/2018, Cate Buck, Senior Planning and 	31/07/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<p>Enforcement Officer, took over the case, she communicated and met with the owner on several occasions.</p> <ul style="list-style-type: none"> • Notice served by recorded delivery 05/09/2018. • Appeal has been submitted. Awaiting Start date. • Start letter received from the Planning Inspectorate. Statement due by 30/07/19. • Awaiting Planning Inspectorate Decision • Appeal dismissed. Compliance with both Notices by 05/08/2020 • Further legal advice being sought in relation to the buildings and fencing. Extension of time given until 30/04/21 for removal of the lake and reverting the land back to agricultural use due to Licence being required for removal of protected species. 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • Court hearing in relation to structures and fencing/gates 03/03/2021 • Case adjourned until 05/07/2021 for trial. Further visit due after 30/04/21 to check for compliance with steps relating to lake removal. • Further visit conducted on 04/05/2021 to check for compliance on Notice relating to the lake. No compliance. Case being reviewed. • 05/07/2021 – Court hearing, owner was found guilty of two charges and had already pleaded guilty to one offence. Fined £550 and £700 costs • 12/07/2021 – Letter sent to owner giving until the 10th August 2021 for the structures to be removed • Site visited on 13/08/21 all structures removed from the site. 	

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
ENF/2018/0543/DEV	24/05/2019	North	Land at North Denes Caravan Park The Ravine Lowestoft	Without planning permission operational development involving the laying of caravan bases, the construction of a roadway, the installation of a pumping station with settlement tank and the laying out of pipe works in the course of which waste material have been excavated from the site and deposited on the surface.	<ul style="list-style-type: none"> • Temporary Stop Notice Served 02/05/2019 and ceases 30/05/2019 • Enforcement Notice served 24/05/2019, comes into effect on 28/06/2019 • Stop Notice Served 25/05/2019 comes into effect 28/05/2019. • Appeal has been submitted. Awaiting Start date. • Appeal to be dealt with as a Hearing. Deadline for Statements 03/08/2020 • Awaiting date of hearing from Planning Inspectorate. • Hearing date set for 02/02/2021. • Hearing adjourned until 09/03/2021 • Hearing adjourned again until 21/04/2021 as was not completed on 09/03/2021. • Awaiting Decision • Appeal dismissed and partial costs to the Council 	30/08/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<ul style="list-style-type: none"> • Compliance with Notice by 18/08/2021 • Extension of time granted for compliance until 31/10/21. • Further extension granted until 15/11/2021. • Site visited on 18/11/21 – no works undertaken, case to be referred to legal department for further action to be considered. • Certificate of Lawful Use (Proposed) application submitted. • Certificate of Lawful Use (proposed) refused. • Appeal submitted in relation to LDC refusal. Statements by 08/07/2022 	
ENF/2019/0307/CON D	21/10/2021	North	The Southwold Flower Company, Land at Wangford Rd/Reydon Lane, Reydon	Breach of conditions, 2, 4 and 8 of Planning Permission DC/18/0335/FUL	<ul style="list-style-type: none"> • 21/10/2021 – Enforcement Notice served. Date effective 25/11/2021. 3/5 months for compliance, requiring the building to be converted to be in full compliance with the permission within 5 months. To cease all retail 	25/02/2022 and 25/04/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
					<p>sales from the site and to submit a scheme of landscaping within 3 months.</p> <ul style="list-style-type: none"> • Appeal submitted. Waiting for start date from the Planning Inspectorate. • Appeal notice received. Statement due to Planning Inspectorate by 21/01/2022. • Awaiting Planning Inspectorate Decision 	
ENF/21/0441/SEC215	03/02/2022	North	28 Brick Kiln Avenue, Beccles	Untidy site	<ul style="list-style-type: none"> • S215 (Land adversely affecting amenity of Neighbourhood) Notice served 07/02/2022- compliance due by 11/06/2022 • Site visit undertaken on 17th June 2022 to check compliance. Site remains untidy. Internal discussion to be held regarding further action. 	11/08/2022
ENF/21/0051/USE	10/03/2022	North	Land West Of Guildhall Lane, Wrentham	Change of use and unauthorised operational development (mixed use including storage of materials, vehicles and caravans and residential	<ul style="list-style-type: none"> • 10/03/2022 - Enforcement Notices served and takes effect on 11/04/2022. 4 months for compliance. 	11/08/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
				use /erection of structures and laying of hardstanding)		
ENF/20/0131/LISTL	17/03/2022	North	6 Upper Olland Street, Bungay	Unauthorised works to a Listed Building (Installation of roller shutter and advertisements)	<ul style="list-style-type: none"> • 17/03/2022 - Listed Building Enforcement Notice served and takes effect on 18/04/2022. 3 months for compliance. • Appeal submitted. Waiting for start date from the Planning Inspectorate. • Appeal started. Statements due by 07/06/2022 • Awaiting Planning Inspectorate Decision 	18/07/2022
ENF/21/0003/DEV	07/04/2022	North	26 Highland Drive, Worlingham	High fence adjacent to highway.	<ul style="list-style-type: none"> • 07/04/2022- Enforcement notice served and takes effect on 09/05/2022. 2 months for compliance. • Appeal submitted. Awaiting start date. • Appeal started. Statements by 30/06/2022 	30/09/2022

LPA Reference	Date of Authorisation (Panel/ Delegated)	North/South	Location	Breach	Status	Date by which Compliance Expected (or Prosecution Date)
ENF/21/0408/COND	12/05/2022	South	Land at Dairy Farm Cottage, Sutton Hoo	Breach of conditions attached to DC/21/0008/FUL relating to removal of summerhouse and steps	<ul style="list-style-type: none"> 12/05/2022 – Breach of Condition Notice served. Three months for compliance 	12/08/2022
ENF/21/0027/USE	16/06/2022	North	18 The Esplanade, Lowestoft	Mobile homes for residential use	<ul style="list-style-type: none"> 16/06/2022 – Enforcement Notice served. Take effect on 18/07/2022. 4 months for compliance 	18/11/2022
ENF/21/0359/CONL	16/06/2022	North	40 Victoria Street, Southwold	Insertion of a rooflight on principal elevation	<ul style="list-style-type: none"> 16/06/2022 – Enforcement Notice served. Take effect on 25/07/2022. 3 months for compliance 	25/10/2022
ENF/21/0411/COND	16/06/2022	North	Paddock 2, The Street, Lound	Change of use of land for residential use and stationing of mobile home	<ul style="list-style-type: none"> 16/06/2022 – Enforcement Notice served. Take effect on 18/07/2022. 4 months for compliance 	18/11/2022

Committee report

Planning Committee South – 26 July 2022

Application no DC/21/4002/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 173 dwellings (including 80 affordable houses) together with associated works, landscaping and infrastructure for Brightwell Lakes (Phase W1) - on DC/20/1234/VOC.

Case Officer Rachel Lambert
01394 444574
rachel.lambert@eastsuffolk.gov.uk

1. Summary

Proposal

- 1.1. 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 is the third application for reserved matters approval of housing on the site, it is also accompanied by a fourth application for Phase W1a.

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 W1' is located east of the A12, with a site area measuring approximately 3.96ha. It is bound by the Central Boulevard Spine Road to the north, with the wider 'W1' phase to the east.
- 2.3. It is proposed that Phase W1 is to be made up of 173 new dwellings (including 80 affordable houses), 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 W1 via the 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/21/4003/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 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 173 dwellings (including 80 affordable houses), associated works, landscaping and infrastructure for Brightwell Lakes - Phase W1.
- 3.3. The western most part of this wider phase, known as Phase W1a, is subject to a separate reserved matters submission (DC/21/4003/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. One third-party comment was received, which raised the following comments:

“Where are the solar panels to help with our energy security? Where is the original ambition for the architecture? More bland boxes on the horizon. Very disappointing and ugly street scenes. There was an opportunity to demand better with a more innovative design, especially with the 'innovation park' as a neighbour. I wonder how many houses will come with a separate dining room! Choose forwards instead of backwards East Suffolk!”

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
Anglian Water	8 September 2021 13 September 2021 20 May 2022 4 July 2022	16 September 2021 No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p><u>16 September 2021</u></p> <p>“We have reviewed the applicant’s submitted foul drainage strategy and flood risk documentation (Surface and Foul Water Drainage Strategy) and consider that the impacts on the public foul sewerage network are acceptable to Anglian Water at this stage. We request that we are consulted on any forthcoming application to discharge Condition 49 of the outline planning application DC/17/1435/OUT, to which this Reserved Matters application relates, that require the submission and approval of detailed foul drainage information. Surface Water - We have reviewed the applicant’s submitted surface water drainage information (Surface and Foul Water Drainage Strategy) and consider that the impacts on Anglian Water’s public surface water sewerage network are acceptable and have been adequately addressed at this stage. We request that we are consulted on any forthcoming application to discharge Conditions 41, 48 and 56 of the outline planning application DC/17/1435/OUT, to which this Reserved Matters application relates, that require the submission and approval of detailed surface water drainage information. Please do not hesitate to contact the Planning & Capacity Team on the number below or via email should you have any questions related to our planning application response.”</p>		

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 – <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	20 September 2021 19 September 2021 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 4 May 2022 7 July 2022 7 July 2022
Summary of comments: <u>4 November 2021</u> “No comment.” <u>4 May 2022</u> “No comment.” <u>7 July 2022</u> “No comment.”		

Consultee	Date consulted	Date reply received
East Suffolk CIL	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 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 18 July 2022</i>
Summary of comments: Internal consultee – comments included within reporting.		

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 Economic Development	8 September 2021 13 September 2021 20 May 2022 4 July 2022	13 September 2021 7 October 2021 No response No response - – <i>consultation end date 18 July 2022</i>
Summary of comments:		
<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.”		
<u>7 October 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.”

Consultee	Date consulted	Date reply received
Historic England	8 September 2021 13 September 2021 20 May 2022 4 July 2022	19 October 2021 No response 6 June 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>

Summary of comments:

19 October 2021

“Recommendation: We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 189, 194, 195, 197, 199, 200, 202 and 203. There are also issues and safeguards outlined in our advice above, that we consider need to be addressed in order for the application to meet the requirements of these paragraphs. Further safeguards are also required to ensure the applicant has addressed the heritage conditions on the outline application. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.”

See full response on Public Access.

6 June 2022

“Recommendation: Historic England has concerns regarding the application on heritage grounds. As it stands, we consider the application therefore fails several the key heritage policies of the NPPF. It does not demonstrate the requirements of 189, 194 and 195, particularly 194 in terms of supporting information. No enhancements are provided or demonstrated as required under 197. In addition, we recommend your authority would need to take into consideration paragraphs 199, 200, 202 and 203 in coming to a decision. We consider that the application does not meet these key policy requirements of the NPPF. We maintain our position that further safeguards are also required to ensure the applicant has addressed the heritage conditions on the outline application. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.”

See full response on Public Access.

Consultee	Date consulted	Date reply received
Natural England	8 September 2021 13 September 2021 20 May 2022 4 July 2022	11 October 2021 No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p><u>11 October 2021</u></p> <p>“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 Page 2 of 7 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. 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><i>See full response on Public Access.</i></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
<p>Summary of comments:</p> <p>Internal consultee – comments incorporated within reporting.</p>		

Consultee	Date consulted	Date reply received
SCC Andy Osman Emergency Planning	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 Fire and Rescue Service	8 September 2021 13 September 2021 20 May 2022 4 July 2022	8 September 2021 No response 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></p> <p>“Please be advised that the Suffolk Fire & Rescue Service have made comment on 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.”</p>		

Consultee	Date consulted	Date reply received
National Highways	8 September 2021 20 May 2022 4 July 2022	No response 31 May 2022 5 July 2022
<p>Summary of comments:</p> <p><u>31 May 2022</u></p> <p>“Referring to the consultation on a planning application dated 20 May 2022, referenced above, in the vicinity of the A12, that forms part of the Strategic Road Network, notice is hereby given that National Highways’ formal recommendation is that we:</p> <p>a) offer no objection (see reasons at Annex A); b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons); c) recommend that planning permission not be granted for a specified period (see reasons at Annex A); d) recommend that the application be refused (see reasons at Annex A)</p> <p>Highways Act 1980 Section 175B is/is not relevant to this application.</p> <p>This represents National Highways’ formal recommendation and is copied to the Department for Transport as per the terms of our Licence. Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of 1 Where relevant, further information will be provided within Annex A. National Highways Planning Response (NHPR 21-09) September 2021 State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.”</p> <p><u>5 July 2022</u></p>		

“With this Reserved Matters application (for Appearance, Landscape, Layout and Scale) is unlikely to have any severe impact on the Strategic Road Network (SRN). We have reviewed the details and information provided. The amendments proposed to this planning application are not in conflict with National Highway’s (former, Highways England) previous formal response, dated 31 May 2022, recommending No Objection. Consequently, our previous recommendation of No Objection remains unchanged.”

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 18 July 2022</i>
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
The British Horse Society	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 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 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	27 October 2021 No response 14 June 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p><u>27 October 2021</u> “The Planning & Development Committee wish to confirm they support Martlesham Parish Council on their constructive and detailed response to the above stated applications. The Committee would also like to highlight the observations and comments made by Martlesham Parish Council on; Construction and Deliveries Traffic Management Plan, Medical Facilities and Sustainable Transport, which are all areas that will also directly affect and impact residents of Kesgrave. We therefore we would very much welcome collaborative working between the Local Planning Authority, Suffolk County Council, the Developer and Parish/Town Councils.”</p> <p><u>14 June 2022</u> “Support - voting was unanimous. Observation: The plans still show a cycle way which does not link up to any other cycle way/path? (a dead end - the side of a dual carriageway?) this has been highlighted in previous responses to this phase of development.”</p>		

Consultee	Date consulted	Date reply received
Kirton Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	4 October 2021 No response 11 June 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p><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.”</p> <p><u>11 June 2022</u> “Kirton & Falkenham PC have no comments to make on this application.”</p>		

Consultee	Date consulted	Date reply received
Martlesham Parish Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	22 October 2021 14 June 2022 6 July 2022 No response – <i>consultation end date</i> <i>18 July 2022</i>

Summary of comments:

22 October 2021

“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 houses 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 Lane in Martlesham • The Woodbridge Town FC Policy 12.25 for 120 dwellings • East Anglia One and Three, and the • McCarthy Stone Retirement Development. 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 BREEAMiv 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 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:

- Cross-site routes for cyclists and pedestrians to be identified and constructed
- Construction of the new routes to meet stated surface specifications
- 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 housingvii 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 developmentviii . 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 populationix 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^{xii} 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."

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 2.5m 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.”

14 June 2022

“1. DC/21/4002/ARM – Land to the South & East of Adastral Park – 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 and 2. DC/21/4003/ARM – Land to the South & East of Adastral Park – 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 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>		
“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
East Suffolk Major Sites	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
Cadent Gas Limited	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
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
Ipswich & East Suffolk CCG & West Suffolk CCG	8 September 2021 13 September 2021 20 May 2022 4 July 2022	29 September 2021 No response No response No response – <i>consultation end date</i> <i>18 July 2022</i>
<p>Summary of comments:</p> <p><u>29 September 2021</u></p> <p>“Due to the mitigation already agreed for health for the entire development as part of a S106, it is my understanding that you will not require us to outline our needs in relation to this phase of the Adastral Park development. As a formal response is not required please accept this email as confirmation from the CCG of agreement to the proposed phase W1.”</p>		

Consultee	Date consulted	Date reply received
Community Health (NHS)	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
Police - Business Liaison 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>
<p>Summary of comments:</p> <p>No response.</p>		

Consultee	Date consulted	Date reply received
Police - General	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
East Suffolk Planning Policy	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
Network Rail Property (Eastern Region - Anglia)	8 September 2021 13 September 2021 20 May 2022 4 July 2022	14 September 2021 No response No response No response - <i>consultation end date 18 July 2022</i>
Summary of comments: <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.”		

Consultee	Date consulted	Date reply received
The Ramblers Association	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
Royal Society for the Protection of Birds	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
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 18 July 2022</i>
Summary of comments: No response.		

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 No response 4 July 2022
Summary of comments: <u>4 July 2022</u> "I refer to the proposal: 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. 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 County Archaeological Unit	8 September 2021 13 September 2021 20 May 2022 4 July 2022	2 December 2021 No response No response No response - <i>consultation end date 18 July 2022</i>
Summary of comments: <u>2 December 2021</u> "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 Flooding Authority	8 September 2021	21 September 2021
	13 September 2021	No response
	20 May 2022	7 June 2022
	4 July 2022	6 July 2022
<p>Summary of comments:</p> <p><u>21 September 2021</u></p> <p>“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.”</p> <p><i>See Public Access for full response.</i></p> <p><u>7 June 2022</u></p> <p>“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</p>		

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 27.25mAOD, 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
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
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.
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 13 September 2021 20 May 2022 4 July 2022	3 November 2021 No response 31 May 2022 8 July 2022
<p>Summary of comments:</p> <p><u>3 November 2021</u></p> <p>“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.”</p> <p><i>See Public Access for full response.</i></p> <p><u>31 May 2022</u></p> <p>“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).”</p> <p><i>See Public Access for full response.</i></p> <p><u>8 July 2022</u></p> <p>“Not withstanding 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...”</p> <p><i>See Public Access for full response.</i></p>		

Consultee	Date consulted	Date reply received
SCC Minerals and Waste	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 Policy Section	8 September 2021 13 September 2021 20 May 2022 4 July 2022	No response No response 23 May 2022 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
Sport England	8 September 2021 13 September 2021 4 July 2022 20 May 2022	No response No response 8 July 2022 23 May 2022
Summary of comments:		
<u>8 July 2022</u> “Sport England has no comment to make on this amended plans/information consultation. Please refer to our previous responses for our current position on this application. Should you require any further information, please do not hesitate to contact me on the email provided. Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.”		
<u>23 May 2022</u> “Sport England has no comment to make on this amended plans/information consultation. Please refer to our previous responses for our current position on this application. Should you require any further information, please do not hesitate to contact me on the number provided. Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.”		

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 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
Suffolk Preservation Society	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
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</i> <i>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</i> <i>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 No response No response No response - <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments: 27 October 2021 Internal consultee – comments included within reporting.		

Consultee	Date consulted	Date reply received
Woodbridge Town Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	7 October 2021 11 May 2022 No response 8 June 2022
<p>Summary of comments:</p> <p><u>7 October 2021</u></p> <p>"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."</p> <p><u>11 May 2022</u></p> <p>"Woodbridge Town Council has provided a response to this application elsewhere - this comment is in order to remove the application from our home."</p> <p><u>8 June 2022</u></p> <p>"The committee agreed to make NO comment."</p>		

Consultee	Date consulted	Date reply received
NHS England Midlands and East	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
Ipswich Borough Council	8 September 2021 13 September 2021 20 May 2022 4 July 2022	2 November 2021 No response No response No response - <i>consultation end date</i> <i>18 July 2022</i>
Summary of comments:		
<u>2 November 2021</u> "I am writing to advise that Ipswich Borough Council does not have any comments to make on this proposal at this time. We would however request that we continue to be consulted on details coming forward for the Brightwell Lakes development so we can keep updated on its progress and to consider any potential impacts this development may have upon Ipswich. This is considered particularly important for considering potential cumulative impacts it may have with other major development schemes we have coming forward in the Borough such as the Ipswich Garden Suburb where construction has now commenced."		

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</i> <i>18 July 2022</i>
Summary of comments: Internal consultee – comments incorporated within reporting.		

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

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.”

5. Publicity

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

Category	Published	Expiry	Publication
Major Application	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: Major Application May Affect Archaeological Site 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 W1 will be 2 and 3 storey in height. The dwellings fronting the Spine Road would be a combination of 3 storey and 2.5 storey to frame the tree lined boulevard and to create visual interest and variety in key locations where vista termination key buildings are required. The southern parts of Phase W1 will be 2 storey in height to reflect the character of the existing tree belt and proposed allotments.

- 8.6. The principles of site-wide development densities were approved by a density parameter plan. To accord with the approved density parameter plan, 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 46 dwellings per hectare.
- 8.7. The approved Design and Access Statement and Character Banding Plan, provides guidelines for overall design ethos of each character area. In this instance, the frontage of the Phase W1 facing the Boulevard Spine Road, falls within “The Boulevard” character area, which is defined by the importance of the Spine Road. The proposals seek to respond to this key frontage and the characteristics of the character area through a contemporary frontage which exhibits a strong building line and height, with formal frontages and narrow gaps to regular rhythm to the road.
- 8.8. Proposed materials include a range of bricks, render and boarding, with contemporary fenestration comprising grey uPVC windows that offer large, glazed openings - see *submitted materials plan for further details*.
- 8.9. 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. 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.
- 8.10. 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

- 8.11. 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.

- 8.12. 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)

- 8.13. The W1 parcel provides 173 dwellings, comprising a range of house types including one-bed maisonettes and four-bedroom houses.

Housing mix

- 8.14. The local plan identifies a need across all tenures for 41% of properties to be one- or two-bedroom dwellings. In this instance, 96 dwellings will be one- or two-bedroom units, equating to 49.2% - as shown in Table 1.
- 8.15. 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.
- 8.16. This is apparent when taking into account the provisions proposed by parcels E1 and E1a, which comprises a greater number of larger units.
- 8.17. 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 shown on the proposed planning layout (PL-01-W1 Rev. N), eleven M4(2) compliant dwellings are proposed within this parcel, equating to 6.4%. 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

- 8.18. 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.
- 8.19. Of the total provision for this parcel, 80 dwellings (46.24%) 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.
- 8.20. Further discussion is required to ensure East Suffolk Council's housing enabling officer is content with the proposed mix and distribution.
- 8.21. 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 W1

Phase E1 housing mix		Number of dwellings
Market	2-bed house	7
	2-bed flat over garage	1
	3-bed house	65
	3-bed town house	14
	4-bed house	6
Affordable rent	1-bed flat	6
	1-bed maisonette	4
	2-bed flat	6
	2-bed flat over garage	3
Intermediate rent	1-bed flat	10
	2-bed flat	8
	2-bed flat over garage	2
Shared ownership	1-bed flat	9
	2-bed flat	9
	2-bed flat over garage	2
Shared equity	1-bed flat	9
	2-bed flat	9
	2-bed flat over garage	2
Total affordable		80
Total market		93
Overall total		173

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%	22% (38 units)
2	29%	28.9% (50 units)
3	25%	45.6% (79 units)
4+	33%	3.5% (6 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)

- 8.22. 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 W1a.
- 8.23. 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.
- 8.24. 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).
- 8.25. 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.

- 8.26. 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.
- 8.27. 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)

- 8.28. 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
- 8.29. 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 adopter, 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)

- 8.30. 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 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.
- 8.32. 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

- 8.33. 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 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)

- 8.36. 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 W1. 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.

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

- 8.40. 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

- 8.41. 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.
- 8.42. 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 W1 of the development (as viewed collectively with Phase W1a) 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

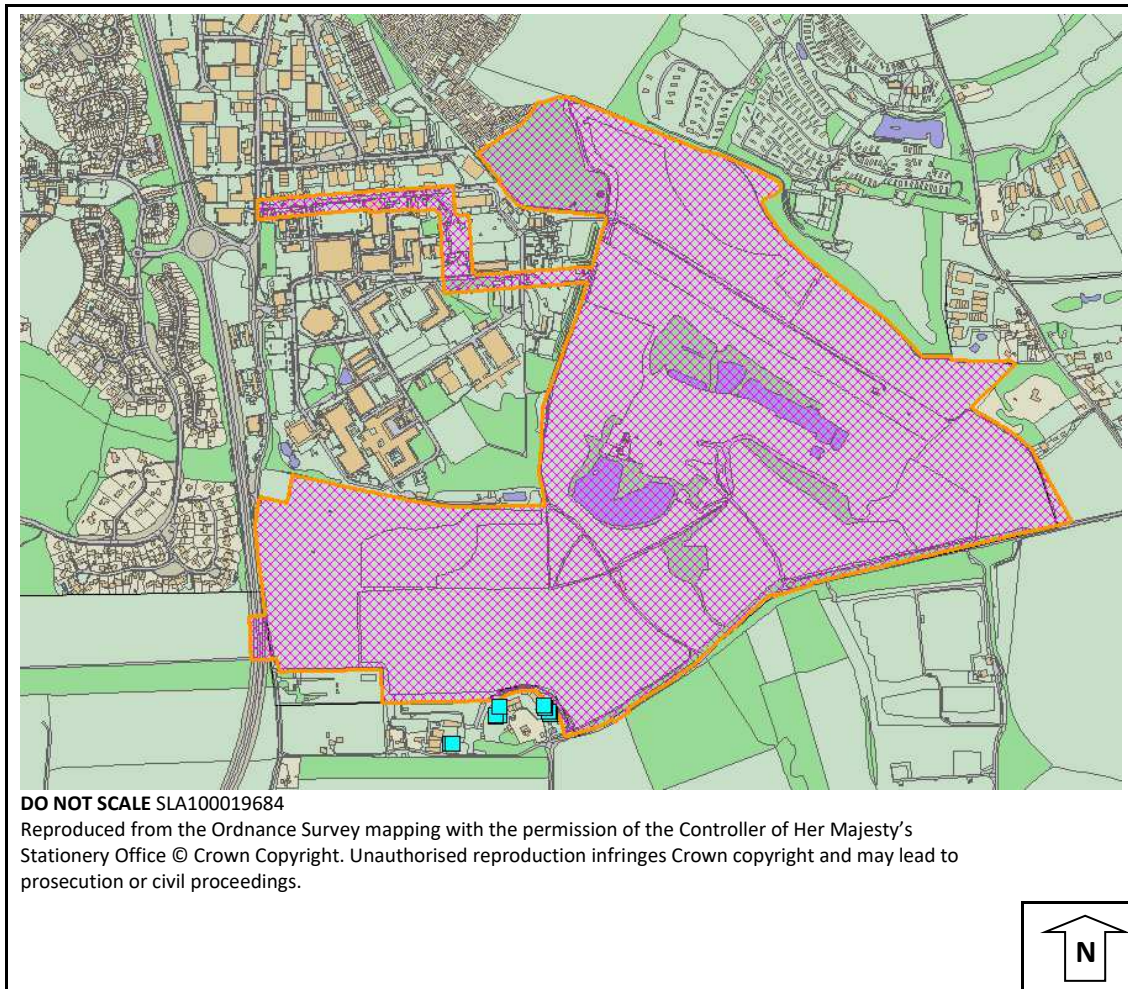
- 10.1. Authority to approve subject to no new material issues being raised during the latest re-consultation period, all outstanding matters being resolved, and agreement of conditions.

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/21/4002/ARM on [Public Access](#)

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support

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
01394 444574
rachel.lambert@eastssuffolk.gov.uk

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>
Summary of comments:		
<p><u>12 October 2021</u></p> <p>“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>
<p>Summary of comments:</p> <p><u>22 October 2021</u></p> <p>“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</p>		

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:		
<p><u>2 December 2021</u></p> <p>“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.”</p>		

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 housetype 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

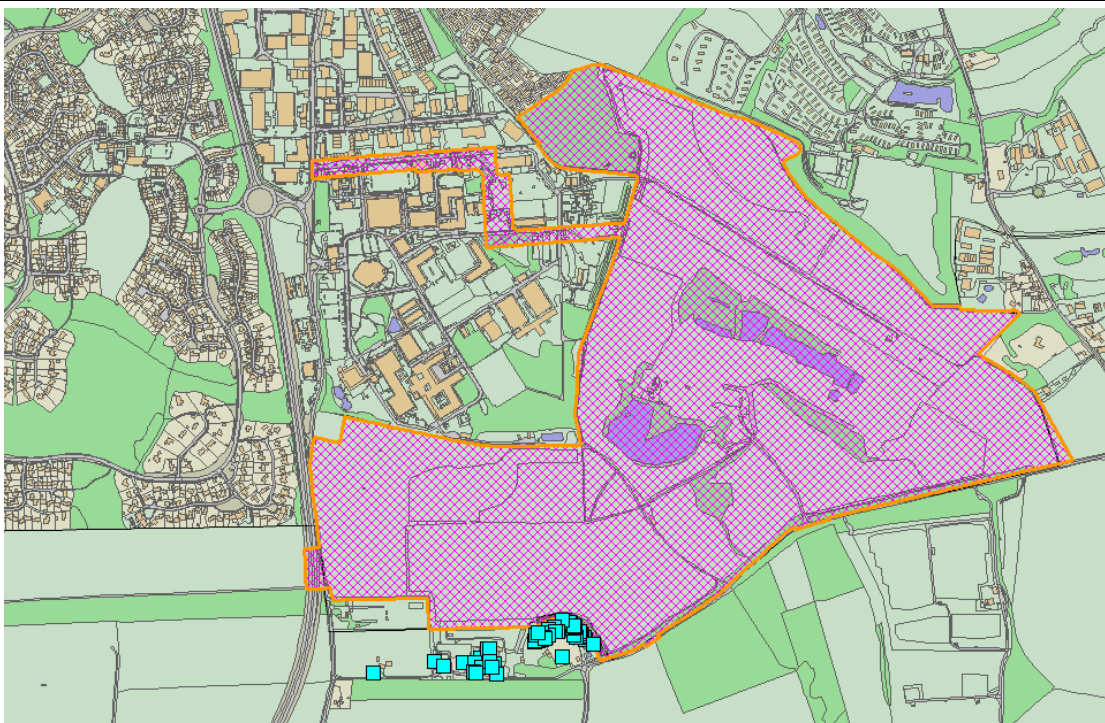
- 10.1. Authority to approve subject to no new material issues being raised during the latest re-consultation period, all outstanding matters being resolved, and agreement of conditions.

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

Committee Report

Planning Committee South – 26 July 2022

Application no DC/21/5698/FUL

Location

60 Old Barrack Road
Woodbridge
Suffolk
IP12 4ER

Expiry date 29 July 2022

Application type Full Application

Applicant Mr D Smith

Parish Woodbridge

Proposal Kitchen Outbuilding for Local Catering Business

Case Officer Grant Heal
07833 403193
grant.heal@eastsuffolk.gov.uk

1. Summary

- 1.1 Planning permission is sought for a single storey outbuilding within the rear garden of no. 60 Old Barrack Road, Woodbridge to be used for food preparation by the occupiers/owners in connection with their catering company.
- 1.2 Considered against all relevant material planning matters, the application is deemed sustainable and therefore recommended for approval in accordance with the NPPF and relevant policies of the adopted development plan.
- 1.3 Reviewed against the Council's adopted scheme of delegation, the applicant is not an elected member, member of staff or close relative. Nor is the land owned by the District Council. The application was presented to the Council's referral panel on Tuesday 19 April 2022 because the 'minded to' decision of the Case Officer is contrary to the Town Council's recommendation to refuse the application.
- 1.4 In-light of concerns raised in relation to potential impacts on local amenity from deliveries and noise/odour nuisance, the Chair and Vice-Chair of planning committee felt there are

sufficient grounds to debate the merits of the application at planning committee. Since the Referral Panel meeting Officers have sought additional clarification from the applicant on the way the use would take place.

2. Site Description

- 2.1 The site is two-storey detached dwelling with frontage and vehicular access onto Old Barrack Road, Woodbridge.
- 2.2 The property benefits from proportionate private front and rear amenity areas, as well as a rear vehicular access off Peterhouse Crescent.
- 2.3 The wider area is characterised as residential.

3. Proposal

- 3.1 This application seeks planning permission for a single storey outbuilding to be used for food preparation by the occupiers/owners of 60 Old Barrack Road in connection with a catering company.
- 3.2 The outbuilding would be approx. 4 x 11 metres with a ridge height of 3.4 metres. It would be situated towards the north-eastern corner of the dwelling's rear garden area and would have a mono-pitched sedum covered roof and rendered elevations.
- 3.3 The building would comprise separate kitchen and store areas served by two doors and two windows and an extraction vent within its principal elevation.
- 3.4 The proposal would provide ancillary space to facilitate cooking and food preparation for an independent catering company operated by the owners/occupiers of the application site.
- 3.5 No employees would visit the site and the scale of the cooking operation would be similar to that which could be undertaken within a large domestic kitchen.
- 3.6 Food produce would be delivered to the site via the property's existing front access off Old Barrack Road and the hours of operation would be:
08:00 to 20:00 - Monday to Saturday;
10:00 to 16:00 - Sundays and Bank Holidays.

Background information

- 3.7 The following background information has been provided to assist members' understanding of the proposed use. This includes information provided by the applicant following a range of questions put to the applicant to clarify the nature of the use:
 - The food preparation operation that would be facilitated by the proposed outbuilding has previously been undertaken within a similar scale outbuilding sited within the curtilage of a family home based in Knodishall for over 20 years. However, this existing business and larger business has since ceased operating following the applicant's business partner's (mother) retirement.

- The applicant has since operated as a sole trader and does not employ anyone else in the preparation, loading or unloading of food produce at the application site.
- A number of waiting staff are casually employed by the applicant to serve food, these staff meet at the venue only and would not be involved in food preparation at the application site.
- At times when the applicant is unable to drive they rely on relatives to assist with deliveries and there would be no third parties collecting produce from the site. They confirm that there will never be any collections of food produced on site from the property and they always deliver.
- The delivery of ingredients would be made to the front of the property as the applicant considers it impractical to use the rear access track (linking the site to Peterhouse Crescent) due to its poor condition and length.
- Access across the garden is adequate to transport food to the front of the property where vehicles are loaded. The applicant has also agreed to the delivery of a footpath linking the outbuilding to the dwelling's existing rear patio to make this arrangement more practical in the longer term.
- Any additional refuse bins (if required) could be stored alongside the property's existing bins and presented for collection from the front of the property, as per the existing arrangement.

4. Third Party Representations

- 4.1 Twelve third-party representations of objection have been received noting the potential for overdevelopment and loss of light and privacy. Construction and operational noise is also cited as a concern, as well as potential odour impacts and those associated with deliveries to and from the site.
- 4.2 One third-party representation of support has been received which notes that the operational scale of the kitchen and its overall proximity to neighbouring dwelling would not result in any detriment to the amenity currently enjoyed.

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Woodbridge Town Council	10 January 2022	21 January 2022
Summary of comments: We recommend REFUSAL due to concerns that vehicular access to the proposed business premises at the very rear of the garden is via a long, narrow track from Peterhouse Crescent. Any delivery, waste collection or emergency vehicles e.g. fire, attempting to access the premises via this track would not have the space to turn round and would block access for any other vehicles. We		

therefore consider that this contravenes SCLP11.1 - j) Ensure that the layout and design incorporates adequate provision for the storage and collection of waste and recycling bins in a way which does not detract from the appearance of the development;

We are similarly concerned about the lack of information available on the Planning Portal - the application is currently lacking a report from the Applicant on matters of Environmental Health (venting of fumes, disposal and storage of waste), fire risk management and access for vehicles. We currently consider that there is inadequate information for the Planning authority and consultees to review and approve this application.

We were also concerned about the lack of public notices displayed at the site.

Statutory consultees

Consultee	Date consulted	Date reply received
SCC Highways Department	11 March 2022	31 March 2022
Summary of comments: No objection - conditions recommended.		

Non statutory consultees

Consultee	Date consulted	Date reply received
The Woodbridge Society	N/A	11 February 2022
Summary of comments: We write to object to this application. The applicant proposes a new building in the rear garden to be used for the purpose of a catering business. This garden adjoins private gardens, the enjoyment of which will be damaged by the kitchen being in uses seven days a week. The application is inappropriate in a residential area. We understand that the rear access is used by a number of residents, including children.		

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	11 March 2022	31 March 2022
Summary of comments: Internal consultation - conditions proposed.		

Site notices

General Site Notice

Reason for site notice: General Site Notice

Date posted: 21 January 2022

Expiry date: 11 February 2022

6. Planning policy

National Planning Policy Framework 2021

SCLP3.3 - Settlement Boundaries (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP3.2 - Settlement Hierarchy (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.31 - Strategy for Woodbridge (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.1 - Design Quality (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)

SCLP11.2 - Residential Amenity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

7. Planning Considerations

Planning history:

- DC/20/3250/FUL: Proposed alterations and extensions at 60 Old Barrack Road Woodbridge - permitted 23 September 2020;
- DC/20/2258/FUL: Proposed alterations and extensions at 60 Old Barrack Road Woodbridge - permitted 24 August 2020.

Planning principle:

- 7.1 The site falls within the Settlement Boundary (SCLP3.3) of Woodbridge (SCLP12.31); which is categorised as a 'Market Town' within the Settlement Hierarchy (SCLP3.2) of the adopted development plan.
- 7.2 Based on the submitted information, the Case Officer is minded that the proposed works represent the erection of a structure that would be used in a way ancillary to the host dwelling.
- 7.3 Indeed, the outbuilding would be used solely by the owner/occupier of the host dwelling for cooking and food preparation to cater for small scale events. The outbuilding would therefore be used in a way similar to a domestic kitchen might be used to facilitate regular family gatherings.
- 7.4 In reaching this conclusion, the Case Officer has also given regard to guidance available on the government's Planning Portal website, which states:

'You do not necessarily need planning permission to work from home. The key test is whether the overall character of the dwelling will change as a result of the business.'

If the answer to any of the following questions is 'yes', then permission will probably be needed:

Will your home no longer be used mainly as a private residence?

Will your business result in a marked rise in traffic or people calling?

Will your business involve any activities unusual in a residential area?

Will your business disturb your neighbours at unreasonable hours or create other forms of nuisance such as noise or smells?

Whatever business you carry out from your home, whether it involves using part of it as a bed-sit or for 'bed and breakfast' accommodation, using a room as your personal office, providing a childminding service, for hairdressing, dressmaking or music teaching, or using buildings in the garden for repairing cars or storing goods connected with a business - the key test is: is it still mainly a home or has it become business premises?'

- 7.5 Judged against the above criteria it is considered that the proposal would not serve to change the nature of the site from mainly being used as a private residence. Further, the scale of the proposed operation is unlikely to result in a marked rise in traffic or people visiting the property since the food preparation would be undertaken solely by the owners/occupiers of the host dwelling and no third parties would be employed at the property. The number of deliveries to and from the site would also be unlikely to result in a notable rise in trips on the local highway network.
- 7.6 Given that the scale of the proposed operation could hypothetically be undertaken within the host dwelling's domestic kitchen, the proposal would not represent an activity that could be considered unusual within a residential area. It is therefore also unlikely that the proposed operation holds the potential to disturb neighbours at unreasonable hours.
- 7.7 Notwithstanding the above, the Case Officer is otherwise conscious that the proposal does present the potential to cause nuisance from odour and/ or noise/vibration from mechanical plant used to mitigate such odours. It is therefore on this basis alone that the necessity for the proposed home working use to be regularised by a planning permission with suitably worded conditions is called into question.
- 7.8 The application is otherwise considered acceptable in principle, subject to a satisfactory assessment of other material planning matters, as set out below.

Visual amenity:

- 7.9 The scale, height and proportions of the proposed outbuilding would appear subservient to the host dwelling and the amount of development can be comfortably accommodated without resulting in the site's overdevelopment.
- 7.10 The outbuilding's siting would be positioned a sufficient distance from the nearest neighbouring dwelling (approx. 24 metres) and therefore would not result in any unacceptable erosion of the proposal site's relation with surrounding properties.

- 7.11 The works would have a minimal impact on the public realm and the proposed forms and materials would appropriately appear as a domestic outbuilding which would complement both the subject property and surrounding area's residential character.
- 7.12 Thus, the proposal is judged to represent a sympathetic and well-integrated development which would serve to update the property in-line with modern live-work aspirations.
- 7.13 In-line with the above, the application is deemed to accord with the provisions set out within the NPPF, as well as SCLP11.1 (Design Quality) of the adopted development plan.

Highway safety and parking:

- 7.14 In consultation with the County Council Highway Authority, it is considered unlikely that the proposal would result in any detriment to existing parking/manoeuvring arrangements, which are judged sufficient to serve the subject property and home-based food preparation operation.
- 7.15 Deliveries to and from the site would be undertaken via the existing Old Barrack Road driveway and, in this regard, the presence of a secondary rear vehicular access off Peterhouse Crescent - as shared by other properties of Clare Avenue - holds an inconsequential bearing on the proposed development's ability to function safely in highways terms.
- 7.16 Existing refuse/recycling storage facilities serving the property are considered adequate to support the operation and, with the above in-mind, the proposal is judged to accord with the relevant provisions of the NPPF and SCLP7.2 (Parking proposals and standards) of the adopted development plan.
- 7.17 The Highway Authority have requested the submission of a Construction Management Plan by way of a suitably worded planning condition attached to any consent that may be granted. Given the modest scale of the built development sought by this proposal, suitably worded conditions restricting working and delivery hours would be sufficient to allay concerns regarding amenity and highway safety implications.

Residential amenity:

- 7.18 Given the proposed building's siting, scale, height and orientation in relation to existing neighbouring properties, it is considered unlikely that any meaningful detriment would result to existing neighbouring amenity from loss of light, privacy or outlook.
- 7.19 In consultation with the Council's Environmental Protection Team, the main source of potential detriment to the amenity currently enjoyed by neighbouring properties relates to nuisance that might be caused by excessive cooking odour and/or noise/vibration from mechanical plant used to mitigate such odours.
- 7.20 In this regard, a suitably worded planning conditions restricting working hours could acceptably alleviate such impacts. The submission of a noise and odour risk assessment shall also be required prior to any approved development's occupation, as well as the submission of noise assessment to ensure that installed mechanical extract equipment is of the correct

specification to ensure odours can be extracted effectively while remaining within acceptable noise limits for the surrounding residential area.

- 7.21 With the above conditions implemented, the Case Officer is content that the proposal would accord with the relevant provisions of the NPPF and SCLP11.2 (Residential amenity) of the adopted Local Plan.

8. Conclusion

- 8.1 As per the above assessment, this application accords with the NPPF and all relevant policies of the adopted development plan.

9. Recommendation

- 9.1 The application is recommended for approval with the following conditions.

Conditions:

1. The development hereby permitted shall be begun not later than the expiration of three years from the date of this permission.

Reason: This condition is imposed in accordance with Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall not be carried out other than in complete accordance with the following approved drawing(s):
- Site location plan (Received 21 December 2021);
 - 8093 - PA/21/01 A (Floor plan);
 - 8093 - PA/21/03 A (Elevations);
 - 8093 - PA/21/02 A (South West Elevations);
 - 8093 - PA/21/04 A (Block Plan).

Reason: For avoidance of doubt as to what has been considered and approved.

3. The materials and finishes shall be as indicated within the submitted application and thereafter retained as such, unless otherwise agreed by the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interests of visual amenity.

4. No construction work shall commence on site before 08:00 and shall not continue after 19:00 Monday to Saturday, with none being undertaken on Sundays and Bank Holidays, unless otherwise agreed by the Local Planning Authority.

Reasons: To prevent noise pollution to adjacent residential properties.

5. Deliveries to and collections from the site as required in connection with the construction phase of the hereby approved development shall not be undertaken between the hours of 07:30 to 09:00 and 15:00 to 16:30 Monday to Friday, with none being undertaken on Sundays and Bank Holidays, unless otherwise agreed by the Local Planning Authority.

Reason: In the interests of amenity and the protection of the local environment.

6. The hereby permitted use relates only to those activities reasonably required in connection with food preparation and for no other purpose whatsoever, unless otherwise agreed by the Local Planning Authority.

Reason: In the interests of amenity and the protection of the local environment.

7. The hereby permitted food preparation use shall be operated solely by the owners/occupiers of the host dwelling with no other employees or third-parties whatsoever shall be allowed to operate from the site in connection with the permitted use unless otherwise agreed by the Local Planning Authority.

Reason: In the interests of amenity and the protection of the local environment.

8. The working hours in connection with the hereby permitted food preparation use, shall only be between 08:00 and 20:00 Monday to Saturday, and between 10:00 and 16:00 on Sundays/ Bank Holidays, unless otherwise agreed by the Local Planning Authority.

Reason: In the interests of amenity and the protection of the local environment.

9. Apart from loading and unloading of produce, no activities or process in connection with the hereby approved food preparation use shall be carried out outside the hereby approved building unless otherwise agreed by the Local Planning Authority.

Reason: In the interests of amenity and the protection of the local environment.

10. Except for the owner's own personal or business vehicle, deliveries to and collections from the site in connection with the hereby permitted food preparation use shall only be made via Old Barrack Road with none being made via the site's Peterhouse Crescent entrance unless otherwise agreed by the Local Planning Authority.

Reason: In the interests of amenity and the protection of the local environment.

11. Prior to the occupation of the hereby approved development, an odour and noise risk assessment in accordance with the updated current guidance (i.e. 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems - An update to the 2004 report prepared by NETCEN for the Department for Environment, Food and Rural Affairs') shall be submitted to and approved by the Local Planning Authority.

The risk assessment shall identify potential sources of odour/noise, pathways and receptors and make recommendations regarding the level of mitigation needed. The Local Planning Authority will be expecting that a rating level (LAeq) of at least 5dB below the typical background (LA90) is achieved. Any required mitigation/control measures shall thereafter be fully implemented in accordance with the approved measures.

Reason: In the interests of amenity and the protection of the local environment.

12. The hereby permitted use shall not commence until a scheme for the extraction, treatment and dispersal of fumes and odours has been submitted to and approved by the Local Planning Authority. The approved scheme shall be implemented prior to the use commencing and thereafter retained and maintained unless otherwise agreed by the Local Planning Authority.

Reason: In the interest of amenity and protection of the local environment.

13. Before the installation of any extractor systems, fans, air-conditioning plant or refrigeration plant, and any other fixed plant, details of a scheme to attenuate noise and vibration shall be submitted to and approved by the Local Planning Authority.

The noise assessment must be undertaken by a competent person should be submitted to include all proposed plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified. Only the approved shall be implemented and retained thereafter.

Reason: In the interest of amenity and protection of the local environment.

14. Prior to the hereby approved development's first use, a suitably surfaced footpath linking the proposed outbuilding with the host dwelling's existing rear patio area shall be fully provided. The footpath shall thereafter be retained in connection with the permitted food preparation use.

Reason: To ensure that safe and suitable access between the permitted outbuilding and host dwelling is retained in connection with the permitted food preparation use.

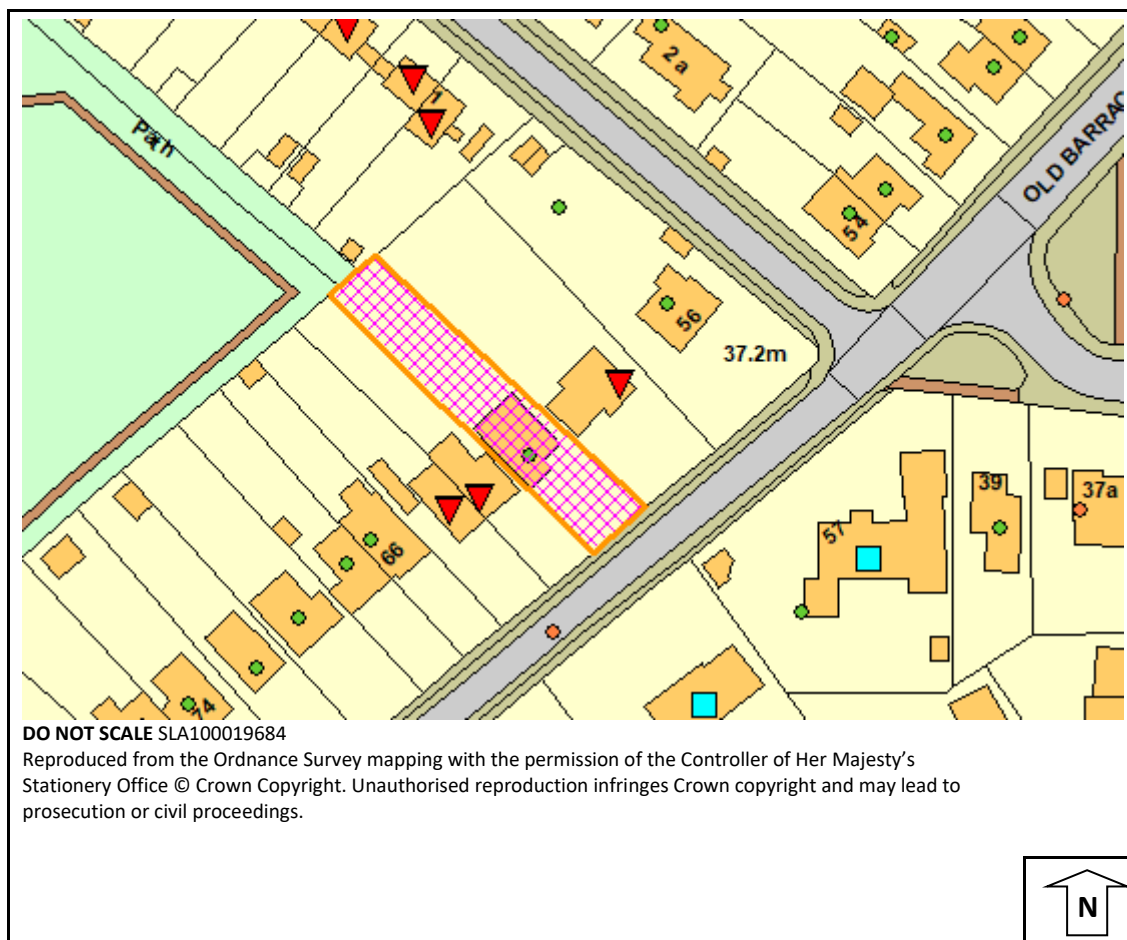
Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.





Background information

See application reference DC/21/5698/FUL on [Public Access](#)

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support

Committee Report

Planning Committee South – 26 July 2022

Application no DC/22/1162/FUL

Location

Woodside
Martlesham Road
Little Bealings
Woodbridge
Suffolk
IP13 6LX

Expiry date 18 May 2022

Application type Full Application

Applicant Mr D Boswell

Parish Little Bealings

Proposal Retrospective Application - Construction of a 4 bay cartlodge with studio above.

Case Officer Nick Clow
nick.clow@eastssuffolk.gov.uk

1. Summary

- 1.1. The application proposes the construction of a 4-bay cart lodge with studio above at Woodside, Martlesham Road, Little Bealings, IP13 6LX.
- 1.2. The application accords with planning policy, the applicant is not an elected member or member of staff or close relative, the land is not owned by the district council. In terms of consultation responses received, Little Bealings Parish Council has objected, there have been three third-party objections, the Ward Member has not commented and there have been no objections from statutory consultees.
- 1.3. As the 'minded to' recommendation was one of approval, contrary to the comments of the Parish Council, the Planning Referral Panel process was triggered. The application was presented to the Planning Referral Panel on 24 May 2022, where it was decided that the application should be referred to Planning Committee for determination.

- 1.4. The application was presented to the Planning Committee on 28 June 2022. The resolution at the meeting was to defer for a site visit which will take place on the morning of 26 July 2022, following which the application will be presented to the Committee in the afternoon.

2. Site Description

- 2.1. The application site sits between the settlement boundaries of Martlesham and Little Bealings. It is not located within a designated settlement boundary therefore in planning terms is located in the countryside.
- 2.2. The application site comprises a large, detached dwelling set back from Martlesham Road and accommodates substantial off-road parking. The curtilage is delineated by close boarded fencing and the surrounding built environment is a mix of bungalows and large detached dwellings of various forms, scales and character.
- 2.3. A Tree Preservation Order (TPO) ESCC/52/00022 affects land abutting the curtilage of the application site to the south therefore, trees and hedgerows located along the front boundary are protected under this Order.
- 2.4. The site is not located within a conservation area, site of special scientific interest (SSSI) or Suffolk Coast and Heath Area of Outstanding Natural Beauty (AONB).
- 2.5. Planning permission was permitted in 2013 for the erection of a single storey side extension to form self-contained one bedroom annexe DC/13/2558/FUL however this was never constructed during the required three-year period and has now lapsed.
- 2.6. The property benefits from an extent planning permission for a substantial two-storey extension on the western side of the dwelling and an extension upwards on the existing building (case reference DC/21/4162/FUL). That consent although not commenced, remains extant, and the external materials have been agreed via discharge of consent application DC/21/5349/DRC. It therefore could be implemented at any time prior to the expiry date of that consent (2 November 2024).

3. Proposal

- 3.1. Planning Permission has also previously been granted for a 4 bay cartlodge with studio above under case reference DC/17/3824/FUL. The approved building had a gabled roof with a lower lean-to roof on the rear (western) elevation. It was approved within the front garden towards the western side of the plot. The consent included standard conditions relating to the standard time limit for commencement, compliance with plans and the submission of external materials prior to commencement.
- 3.2. A building has been constructed in a similar location to that consented under DC/17/3824/FUL, but it does not comply with the drawings approved under that consent, and the materials condition was not discharged prior to commencement. The constructed building is the subject of this current planning application.
- 3.3. The cartlodge is located to the southwest of the Woodside sitting in front of the principal elevation close to the boundary with 'The Weald'.

- 3.4. The previously consented outbuilding possessed numerous features that were different to the constructed cartlodge such as a catslide roof, lower ridge and exterior staircase. The overall external dimensions of the consented and constructed building were/are:

	Previously consented under DC/17/3824/FUL	As constructed and the subject of this application
Width	8m	8.52m
Length	13.15m (plus external staircase 0.85m)	13.67m
Eaves Height	1.9m / 2.82m	2.92m
Ridge Height	6.16m	7.73m

- 3.5. The constructed cartlodge possesses a dual pitched roof and contains 2 bays for parking, 2 bays for storage and a hall located on the ground floor. The first floor roofspace accommodates a studio with associated shower room, kitchenette and additional storage.
- 3.6. Three rooflights are located along the eastern roof slope, a large first floor picture window is located on the northern elevation and a smaller first floor window sits along the southern elevation. Materials include Seaford Red Multi Brick finishing the exterior walls, red pantiles forming the roof, dark grey aluminium framed windows and white uPVC doors.

4. Third Party Representations

- 4.1. Three representations of objection have been received raising the following material planning considerations:
- Overlooking to the rear garden of 'The Weald' and 'The Pines' to the west and overlooking into habitable rooms of 'Camelot' to the north.
 - The scale and appearance are out of character with the surrounding built environment as well as over dominating the streetscene and boundary with 'The Weald' to the west.
 - Concerns raised regarding the future use of the cartlodge and studio due to services being routed into the building and noise and disturbance issues arising from its vehicular use.
 - Overbearing- Footings of the outbuilding have been moved closer to the neighbouring boundary with 'The Weald' creating an oppressive environment.
 - Noise and Disturbance- concerns have been raised regarding potential noise and disturbance issues arising from the use of the studio above the cartlodge and its perceived adverse impact on neighbouring residential amenity.
 - Landscape changes- Removal of majority of the trees along the boundary with the 'The Weald' and along the front of the curtilage has exacerbated the above concerns raised such as its relationship with 'The Weald,' privacy and overlooking.

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Little Bealings Parish Council	8 April 2022	4 May 2022
<p>“The Council considered this application at a recent meeting and resolved to object to the application. The Council understands that the development is to have a separate electricity and water supply and has considered it with reference to SCLP 5.7.</p> <p>The Council has considered the position, size, design and materials used for the development and is resolved that the development is harmful to the character of the area, the neighbouring property and the streetscene.”</p>		

Non statutory consultees

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	8 April 2022	10 May 2022
<p>Summary of comments: The variation to its approved position makes no material difference to impact on nearby TPO trees. On that basis I have no objections.</p>		

Publicity

None

Site notices

General Site Notice

Reason for site notice: General Site Notice

Date posted: 14 April 2022

Expiry date: 10 May 2022

6. Planning policy

National Planning Policy Framework 2021

SCLP5.13 - Residential Annexes (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP 7.2 - Parking Proposals and Standards (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)

7. Planning Considerations

Visual Amenity

- 7.1. Whilst the location of the garage building forward of the dwelling could result in potential views from the Martlesham Road, the principle of a four bay garaging building with accommodation in the roof forward of the dwelling towards the western side of the front garden, has been previously accepted by the granting of Planning Permission DC/17/3824/FUL.
- 7.2. The 2017 consent has lapsed because the building constructed does not accord with the approved drawings, and the three years for commencement of that consent has now lapsed. However, it still forms a material planning consideration, and given this previous consent it would be extremely difficult to seek to resist the principle of a building in this location.
- 7.3. The previously consented garage building was more traditional in form with a narrower gabled roof that had a lean-to on the rear to enable the required depth for vehicles on the ground floor, whilst minimising the bulk and mass of the roof. It is unfortunate that the building has been constructed with a gable that spans the width of the building, as this has resulted in a higher ridge (1.5m higher than previously consented) and a bulkier roof with a larger volume. The resulting form is less visually attractive than that previously consented, but it is not sufficiently detrimental to visual amenity to warrant the refusal of the application.
- 7.4. The consent for the large extension on the host dwelling is also material to the consideration of the visual appearance of this outbuilding, as it remains an extant consent, and the relevant conditions have been discharged, suggesting an intent to construct it. Once the extension has been constructed, the outbuilding will appear more in proportion to the resulting dwelling in terms of its visual scale.
- 7.5. It is unfortunate that the applicants commenced works without submitting details of the external materials via a discharge of condition application, as required on DC/17/3824/FUL. However, the materials used to construct the building (multi-brick, red pantiles and dark grey aluminium windows) are not dissimilar to those approved for the extension to the dwelling. Therefore, they are acceptable, and would not be out of character with the locality.
- 7.6. Therefore, for the reasons set out above the scheme is acceptable in terms of visual amenity and accords with the requirements of the NPPF, Local Planning Policy SCLP11.1 in this respect and Supplementary Planning Guidance 16.

Residential Amenity:

- 7.7. The building is taller than that previously granted consent, but it is located in a similar location, towards the western side of the front garden. It is approximately 5m from the

western boundary of the site (with 'The Weald') which is slightly closer than consented under DC/17/3824/FUL.

- 7.8. The close proximity of the cartlodge with the boundary of 'The Weald' was apparent following a site visit to the property. The proximity to the boundary was also raised by the Parish Council, occupiers of 'The Weald' and 'The Pines'. This relationship does not create an overbearing and confined environment that is detrimental to residential amenity because the angle of the building to this boundary has been adjusted, and there remains approximately 5m from the boundary which is substantial enough to alleviate any potential overbearing impacts on neighbouring amenity.
- 7.9. Comments were raised regarding a potential adverse impact on privacy and overlooking into habitable rooms and the private areas of the neighbouring rear gardens of neighbouring dwellings. At first floor level the building has windows on the northern and southern gables and roof lights on the eastern roofslope. The window in the southern gable faces the public highway and the rooflights face the applicants own front garden. The window in the rear gable would face in a northerly direction over the applicant's side/rear garden. Views through this window towards the dwellings to the east and west could only be achieved by leaning at a very acute angle. Views towards the dwelling at the rear would be limited due to the separation distance, as there is approximately 26.5m between the window and the rear boundary of the site with Beacon Lane, which separates the site from the neighbouring dwellings to the rear. An external staircase was permitted under the original plans, and it is viewed that the replacement picture window actually has less potential adverse privacy/overlooking impacts to neighbouring properties.
- 7.10. Therefore, the scheme is acceptable in terms of overlooking /privacy considerations.
- 7.11. Due to the separation distance and location of the building to the east it is concluded that there is no impact on the availability of natural daylight/sunlight entering habitable rooms of 'The Weald'.
- 7.12. Potential noise and disturbance issues associated with the vehicular use of the cartlodge were raised as a concern. The use of the cartlodge was approved under DC/17/3824/FUL and deemed satisfactory in relation to residential amenity impacts. The use of the cartlodge and thus its potential impacts on residential amenity have not changed. The use for vehicles is to be expected in an outbuilding within a residential curtilage. It would not cause a significantly adverse impact on neighbouring residential amenity as to warrant refusal.
- 7.13. Therefore, for the reasons outlined above, the scheme is acceptable in terms of residential amenity and accords with the NPPF, Local Plan Policy SCLP11.2 and Supplementary Planning Guidance 16 in this respect.

Accuracy of Plans:

- 7.14. The accuracy of the plans was also highlighted as a concern because the extension on 'The Weald' has been omitted therefore affecting the interpretation of impacts caused by the development on 'The Weald'. Despite this omission the plans contained sufficient information to make a professional judgement on the potential impacts caused by the

development and this was accompanied with a site visit that ensured the built and natural environment surrounding the curtilage of the application site was fully considered.

Trees and Landscaping:

- 7.15. Following consultation with the local authority Arboriculture and Landscape team, moving the footings of the outbuilding towards 'The Weald' has had no adverse impact on the neighbouring Tree Preservation Order (TPO).

- 7.16. The previous consent granted in 2017 DC/17/3824/FUL applied the following condition:

“No development shall take place until the existing trees on site have been protected by the erection of temporary protective fences of a minimum height of 1.5 metres, set 1.5 metres beyond the adjacent edge of the proposed building. The protective fences shall be retained throughout the duration of building and engineering works in the vicinity of the trees to be protected. Any trees dying or becoming severely damaged as a result of any failure to comply with these requirements shall be replaced with trees of appropriate size and species during the first planting season, or in accordance with such other arrangement as may be agreed in writing with the Local Planning Authority, following the death of, or severe damage to the trees”.

- 7.17. The applicant did not comply with the condition and subsequently removed the trees. Although the removed trees were not protected by a TPO, they were sought to be protected by the condition in the interests of visual amenity. Therefore, for the same visual amenity reasons to soften the visual appearance of the building, two conditions have been included on the recommendation below, which require the replacement of some of the trees lost with planting along the western and southern boundaries to minimise the visual intrusion of the outbuilding on the streetscene.

Future Use of Development:

- 7.18. The Parish Council and the occupiers of 'The Pines' submitted concerns regarding the future use of the cartlodge and studio after it was noted that new electricity and water connections have been directed into the development. The plans also suggest that the previously consented w/c has been constructed as a shower room accompanied by a kitchenette. The cartlodge is very large but still smaller than the host dwelling clearly reading as an ancillary addition to the curtilage.
- 7.19. At this stage there is no evidence or reason to assume that the outbuilding will not be used for anything other than ancillary activities associated with the domestic occupancy of the host dwelling. However, a condition will be included to ensure that this remains the case.

Community Infrastructure Levy (CIL)

- 7.20. As this building has a floorspace greater than 100sqm, it is CIL liable, and as the application is seeking retrospective Planning Permission, self-build exemption cannot be

sought. Therefore, the applicants are likely to be liable for the full CIL amount upon the issuing of decision, if this scheme is granted.

- 7.21. The site is within the High CIL Charging Zone, where current rates are £192.28 per sqm (2022 Indexed CIL rate). The precise calculation of the CIL liability will be calculated as part of the issuing of the liability notice, but as the useable internal floorspace is in excess of 160sqm, and the consent is retrospective so not able to benefit from any exemption, the CIL liability will likely be in excess of £30,000.

8. Conclusion

- 8.1. Whilst it is unfortunate that this building has been constructed without compliance with the previously consented drawings and prior to seeking planning permission for the form constructed, it must be considered on the same material planning considerations as would be for a proposed scheme. It cannot be resisted because it is retrospective or a breach of the previously consented scheme.
- 8.2. As explained in the considerations section of this report, the scheme is acceptable in terms of visual and residential amenity, and accords with the NPPF, Local Planning Policies SCLP11.1 and SCLP11.2, and Supplementary Planning Guidance 16. It is therefore acceptable and should be approved subject to appropriate conditions.

9. Recommendation

- 9.1. Approve subject to the conditions set out below.

Conditions

1. The development hereby permitted shall be completed in all respects strictly in accordance with Drawing numbers 22108/2, 22108/3 and site plan received on the 24.03.2022 and for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: For the avoidance of doubt as to what has been considered and approved.

2. The cartlodge and studio above hereby permitted shall not be occupied at any time other than for purposes ancillary to the residential use of the dwelling known as Woodside.

Reason: Having regard to the special circumstances put forward by the applicant in relation to a proposal which is inappropriate for use as a separate dwelling.

3. Within 3 month(s) of the date of this consent, satisfactory precise details of a tree and/or hedge planting scheme (which shall include species, size and numbers of plants to be planted) for the area between the western and southern elevations of there hereby consented outbuilding and the southern and western boundaries of the application site, shall be submitted to and approved by the local planning authority.

Reason: To ensure the submission and implementation of a well-laid out scheme of landscaping to soften the appearance of the building in the wider streetscene in the interest of visual amenity.

4. The approved tree/shrub planting scheme shall be implemented not later than the first planting season (November - April) following the issuing of this consent (or within such extended period as the local planning authority may allow) and shall thereafter be retained and maintained for a period of 5 years. Any plant material removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season and shall be retained and maintained.

Reason: To ensure the submission and implementation of a well-laid out scheme of landscaping to soften the appearance of the building in the wider streetscene in the interest of visual amenity.

Informatives

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
2. Planning Act 2008 (Part 11) and the Community Infrastructure Levy Regulations 2010 (as amended) The development referred to in this planning permission is a chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

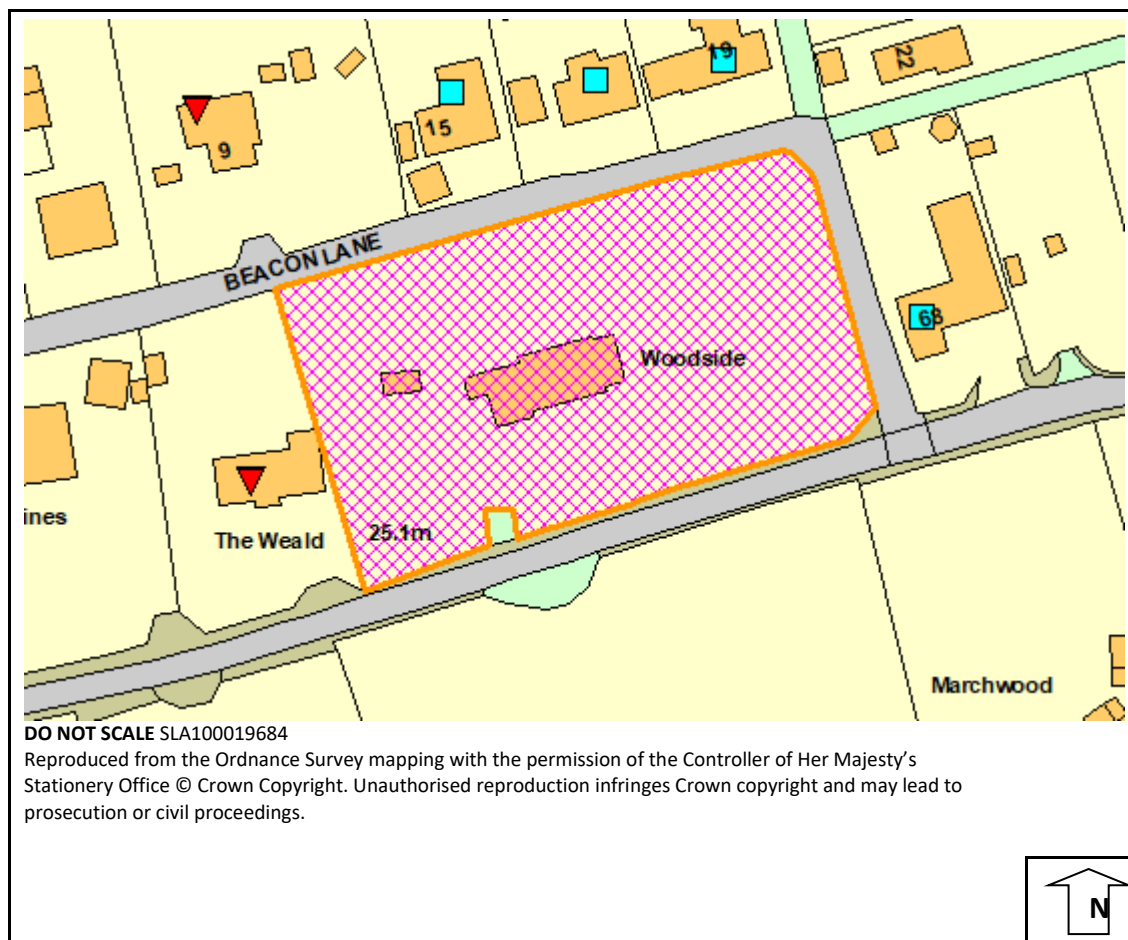
Please note as this consent is being granted retrospectively, self-build exemption can not be sought, and the full CIL payment will be liable in full upon the issuing of this planning decision notice.

Failure to comply with the correct process as detailed in the regulations may result in surcharges and enforcement action. Full details of the process for the payment of CIL can be found at <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>





Background information

See application reference DC/22/1162/FUL on [Public Access](#)

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support

Committee Report

Planning Committee South – 26 July 2022

Application no DC/22/1303/FUL

Location

5 Gladstone Road
Woodbridge
Suffolk
IP12 1EF

Expiry date 31 May 2022

Application type Full Application

Applicant Ms C Samuel

Parish Woodbridge

Proposal Single storey rear and side extension and alteration works to the existing property.

Case Officer Nick Clow
nick.clow@eastsuffolk.gov.uk

1. Summary

- 1.1 The application seeks planning permission for the construction of a single storey rear and side extension and alterations to 5 Gladstone Road in Woodbridge.
- 1.2 The officer recommendation of approval is contrary to Woodbridge Town Council's recommendation of refusal. The application was subject to consideration by the Referral Panel on 22 June 2022 with a recommendation that the application be determined under delegated powers. The Panel recommended that the application be referred to Planning Committee (South) for determination.

2. Site Description

- 2.1 5 Gladstone Road is a mid-terrace dwelling located within the settlement boundary of Woodbridge. The dwelling is situated on Gladstone Road, which adjoins Sun Lane to the northeast and St Johns Hill to the west.

- 2.2 The dwelling is located within Character Area 7 of the Woodbridge Conservation Area. The Woodbridge Conservation Area is not affected by an Article 4 direction and therefore permitted development rights remain intact. The Woodbridge Conservation Area Appraisal highlights that the terrace on Gladstone Road dates back to 1892. The dwelling is identified as being a significant building within the Woodbridge Conservation Area Appraisal.
- 2.3 The rear elements of the Gladstone Road terrace are visible from the Sun Lane entrance to Gladstone Road, where the rear of the terrace is visible, and it is possible to see that all of the terrace appear to have similar rear gable ended projections. Planning Permission was granted in 2018 for a loft conversion including the erection of a rear dormer under DC/18/0465/FUL.
- 2.4 The row of terraces on Gladstone Road benefit from long rear gardens, with a row of grade II listed terrace buildings adjoining the boundary at the bottom of the curtilage. The topography of the ground descends from west to east causing No.5 Gladstone Road to sit higher than its neighbouring property No.6 to the east.

3. Proposal

- 3.1 Planning permission is sought for a single storey side and rear extension and alterations to the property.
- 3.2 The proposal has been amended during the course of the application. The extension originally proposed measured approximately 6.5m in length however this has now been reduced by approximately 2.5m and now measures approximately 4m in length. The extension would have a width of approximately 4.2m and a height of 3.5m. The eaves sit at approximately 2m in height from the site's ground level and approximately 2.7m when measured from the lower ground level within No.6's curtilage.
- 3.3 The extensions have a sloping roof with two roof lights located along the eastern roof slope of the side extension and bi-fold patio doors facing towards the rear garden.
- 3.4 Other alterations to the property include the addition of two roof lights within the eastern roof slope of the existing first floor rear wing.
- 3.5 Materials include facing brick and zinc finishing the exterior walls, clay pantiles and zinc forming the roof and timber/aluminium windows. The patio doors will be constructed from timber and aluminium.

4. Third Party Representations

- 4.1 Comments from two neighbouring properties have been received raising the following material planning issues:
- 4.2 Access - concerns regarding the construction of the extension due to the narrow nature of Gladstone Road and how this has not been considered by the applicants.
- 4.3 Dominating/Overbearing – it is felt that the proposed location of the extension along the boundary in combination with the decreasing ground levels creates an overly dominant and overbearing impact on neighbouring residential amenity.

4.4 Loss of Light/Overshadowing - due to the close proximity of the dwellings, concerns have been raised regarding the potential impact the extension will have on the availability of natural daylight/sunlight entering neighbouring habitable rooms creating a tunnel effect.

4.5 Design - not in keeping with the Victorian/Edwardian character of the area.

4.6 Accuracy of Drawings - the compass direction on the drawings is thought be inaccurate.

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Woodbridge Town Council	8 April 2022	11 May 2022
Summary of comments: We recommend REFUSAL as this application contravenes Policy SCLP11.2: Residential Amenity c) Access to daylight and sunlight; e) The resulting physical relationship with other properties;		

Non-Statutory Consultees

Consultee	Date consulted	Date reply received
East Suffolk Design and Conservation	9 May 2022	No response
Summary of comments: No comments received.		

Publicity

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

Category	Published	Expiry	Publication
Conservation Area	14 April 2022	10 May 2022	East Anglian Daily Times

Site notices

General Site Notice	Reason for site notice: Conservation Area Date posted: 14 April 2022 Expiry date: 10 May 2022
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6. Planning Policy

National Planning Policy Framework 2021

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)

SCLP11.4 - Listed Buildings (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.5 - Conservation Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SPG 16 - House alterations & extensions (East Suffolk Council - Suffolk Coastal District Local Plan -Supplementary Planning Guidance)

7. Planning Considerations

Visual Amenity and Impact on the Conservation Area

- 7.1 The proposed extension is located to the rear of the main dwelling which is primarily screened by the existing row of terraced properties, however, because Gladstone Road dog legs towards Sun Lane, the extension would be visible from certain points along the northern part of the street.
- 7.2 The extension is single storey, and the lean-to roof follows closely the form of the rear gable end projection of the host dwelling and surrounding properties. The extension clearly reads as a subordinate addition to the dwellinghouse due to the modest ridge and eaves height sitting lower than the existing roofs. Facing brick and timber are harmonious with the surrounding built environment, and examples can be seen throughout Gladstone Road with brick finishing the exterior walls and timber sash windows.
- 7.3 Although zinc has not been utilised previously along Gladstone Road, this modern design is not viewed as detrimental to the overall Victorian/Edwardian character of the area because the location is not situated in a prominent position along Gladstone Road, and viewable public vantage points are limited.
- 7.4 Despite the compact nature of the curtilages, the reduced length of the proposed extension helps to minimise the scale of the footprint and therefore can be accommodated satisfactorily within the curtilage boundaries without appearing as overdevelopment.
- 7.5 For the above reasons, the proposed scheme will not have a detrimental impact on the significance of the conservation area or visual amenity of the streetscene due to the use of high-quality materials and its design, scale, form, height, massing and position.
- 7.6 The proposed development complies with SCLP 11.1 and 11.5.

Residential Amenity

- 7.7 The close proximity of the extension with the boundary of No.6 Gladstone Road raises concerns regarding a dominating and overbearing environment that is detrimental to neighbouring amenity. This was also an issue highlighted by Woodbridge Town Council and neighbours.
- 7.8 Consideration has been given to the drop in ground levels towards No.6 which makes the extension appear taller and potentially more dominant than if the ground levels had remained consistent.
- 7.9 The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (the GPDO) Schedule 2, Part 1, Class A permits extensions subject to a number of criteria without the need to apply for planning permission. However, in this case the proposed side extension is located within the Woodbridge Conservation Area and the GPDO states that any enlargement extending beyond a wall forming a side elevation of the original dwellinghouse within a conservation area cannot take place without an application for formal planning permission. As such, there is no permitted development fallback for the proposed side extension.
- 7.10 Although the location of the side elevation of the extension along the boundary with No.6 is unfortunate, the eaves do not exceed 3m in height and the length of the extension has been reduced to 4m which substantially reduces the extension's presence along the boundary. It is therefore the view of officers that the impact of the extension on residential amenity is not so dissimilar to that of any development constructed within 2m of the boundary under the GPDO criteria if the location would have been outside of a conservation area.
- 7.11 The outlook of No.6 may be adversely affected by the featureless brick wall that will abut the curtilage boundary, potentially creating an overly oppressive environment. Under Part 2 of the GPDO 2015, A.1 (b) a fence no taller than 2m can be erected along the curtilage boundary without the need to apply for formal planning permission if it is not located adjacent to a highway. Consequently, a 2m high close boarded fence could be erected along the boundary with No.6 extending the length of the curtilage.
- 7.12 The eaves of the proposed extension are no greater in height than approximately 2m therefore, despite the drop in ground levels exacerbating the presence of the development along the boundary, the overall impact on outlook would not be materially different if the applicants erected a fence instead of the proposed extension. Additionally, the reduction of 2.5m in length has mitigated the impact of the development and lessened the oppressive appearance along the eastern elevation.
- 7.13 Loss of natural daylight and overshadowing is a material planning consideration that requires assessment due to the narrow nature of the terraced dwellings and their close proximity to one another. This was also a concern raised by Woodbridge Town Council and neighbouring occupiers.
- 7.14 A 45° light test was undertaken to assess the amount of light entering the dining room window along the rear elevation of No.6 if the proposed extension is constructed. Although the line passes through the middle of the window, natural light/daylight entering the window is already substantially reduced by the presence of the existing two storey rear wing

projecting from No.5. The single storey side/rear extension is not going to impact the amount of light entering the dining room window any worse than the existing built environment.

- 7.15 No.6 has numerous windows facing west towards No.5 which may be adversely impacted by the proposed extension. Following a 45° light test it is determined that the eaves of the extension will reduce the amount of light entering these windows. Under the GPDO however a 2m high close boarded fence can be erected along the eastern boundary without the need to apply for formal planning permission, and may have a similar impact on the availability of natural daylight/ sunlight entering the same windows.
- 7.16 The extension also sits north-west of No.6, therefore minimising the amount of light that may be reduced by its construction, and the reduction in length to approximately 4m further helps to reduce this impact. It is viewed that the impact on light caused by the presence of the proposed extension would not be so materially different as a structure that complies with the GPDO.
- 7.17 Comments were submitted regarding the impact construction may have on the surrounding area and potential damage to the built environment. Although these comments are noted, given the scale and nature of the development such impacts not likely to so significant that a construction management plan should be required in this instance.
- 7.18 No glazed features are located along the eastern elevation of the extension therefore no direct overlooking will occur that may adversely affect the privacy of the occupiers at No.6. The existing rear wing accommodates numerous windows that allow direct overlooking into the curtilage of No.6 which is exacerbated by the lower topography of No.6. The removal of such features has a positive impact on the residential amenity of the occupiers at No.6.
- 7.19 The large window and bi-fold patio doors situated along the rear elevation will not create a new line of sight that is detrimental to the privacy enjoyed by the occupiers at No.6 or cause any overlooking that may adversely affect neighbouring residential amenity. The rooflights similarly do not create a new line of sight that would cause privacy or overlooking issues adversely affecting the neighbouring residential amenity of No.6.
- 7.20 The proposed development complies with SCLP 11.2.

Impact on the Setting of nearby Listed Buildings

- 7.21 The application site is located to the rear of a row of grade II listed Georgian Cottages situated along Sun Lane. The Woodbridge Conservation Area Appraisal describes them as "an exquisite terrace of 12 small cottages".
- 7.22 The proposed development is located to the rear of the listed dwellings, separated by the rear gardens of both Gladstone Road and Sun Lane, and utilises good quality materials such as facing brick, zinc and timber. It is therefore concluded that the proposed extension is of an appropriate design, scale, height and massing and does not harm the character of the cottages or any architectural, artistic, historic, or archaeological features that contribute towards their special interest. This complies with SCLP 11.4.

Accuracy of Drawings

- 7.23 Concerns were raised regarding the accuracy of the plans provided to the local planning authority as part of this application. It is our view that the drawings provided to us were sufficiently accurate and detailed in order to form a professional judgement and assess the necessary material planning considerations of the proposed scheme.

8. Conclusion

- 8.1 This application complies with SCLP 11.1, 11.2, 11.4 and 11.5 and with the relevant provisions of the NPPF.

9. Recommendation

- 9.1 Approve subject to the conditions below.

Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be completed in all respects strictly in accordance with the site location plan received on 05.04.2022, revised floor plan received on 07.06.2022 and revised elevation and block plans received on 10.06.2022 for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. The materials and finishes shall be as indicated within the submitted application and thereafter retained as such, unless otherwise agreed in writing with the local planning authority.

Reason: To ensure the satisfactory appearance of the development in the interests of visual amenity

Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
2. East Suffolk Council is a Community Infrastructure Levy (CIL) Charging Authority.

The proposed development referred to in this planning permission may be chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

If your development is for the erection of a new building, annex or extension or the change of use of a building over 100sqm in internal area or the creation of a new dwelling, holiday let of any size or convenience retail , your development may be liable to pay CIL and you must submit a CIL Form 2 (Assumption of Liability) and CIL Form 1 (CIL Questions) form as soon as possible to CIL@eastsoffolk.gov.uk

A CIL commencement Notice (CIL Form 6) must be submitted at least 24 hours prior to the commencement date. The consequences of not submitting CIL Forms can result in the loss of payment by instalments, surcharges and other CIL enforcement action.

CIL forms can be downloaded direct from the planning portal:

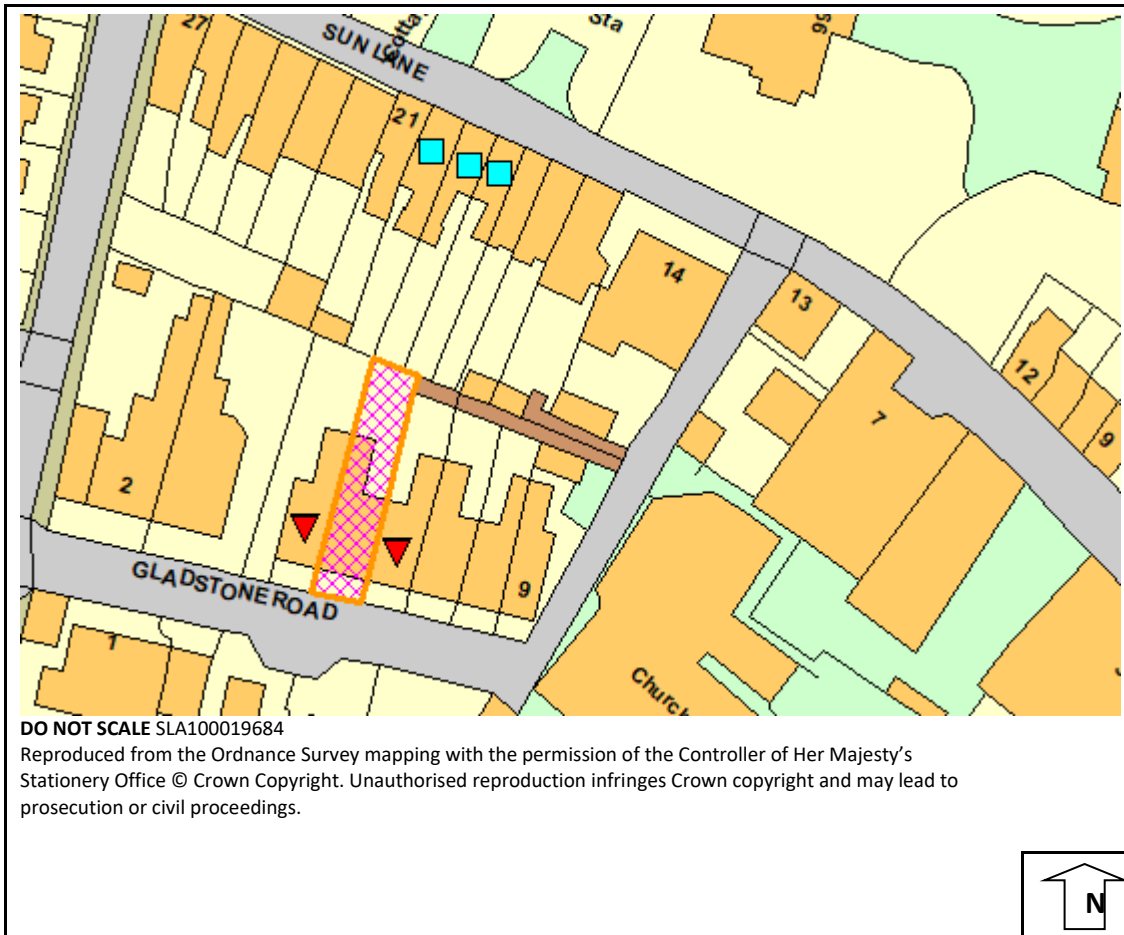
https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

Guidance is viewable at: <https://www.gov.uk/guidance/community-infrastructure-levy>





Background information

See application reference DC/22/1303/FUL on [Public Access](#)

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support

Committee Report

Planning Committee South – 26 July 2022

Application no DC/22/1996/FUL

Location

Kiosk Site Near Bent Hill
The Promenade
Undercliff Road West
Felixstowe
Suffolk
IP11 2AB

Expiry date 10 July 2022

Application type Full Application

Applicant Mr J. Newman

Parish Felixstowe

Proposal Replacement beach side kiosk adjacent to promenade

Case Officer Mark Brands

07881 234242

mark.brands@east Suffolk.gov.uk

1. Summary

- 1.1. Full planning permission is sought for the replacement of a beachside kiosk adjacent to the promenade in Felixstowe.
- 1.2. As the applicant and landowner is East Suffolk Council, the proposal is to be determined at Planning Committee in accordance with the scheme of delegation.
- 1.3. The application is recommended for approval.

2. Site Description

- 2.1. The site is located on the beachside of the promenade between the Spa Pavilion and Pier. The present site is the concrete plinth and base, with Peters Ice Cream kiosk having been removed from the site. The conservation area does not extend to the beachside part of the

promenade. The site is in a relatively prominent location, as the road and roadside greens are at a higher level, with the site in close proximity to Bent Hill. As such this is one of the main routes from the town centre to the seafront, with bars and cultural spaces by this junction and sea frontages.

3. Proposal

- 3.1. The proposal is for the replacement of a beachside kiosk adjacent to the promenade. The former Peters Ice Cream kiosk has already been removed from the site, with only the concrete base remaining.

4. Third Party Representations

- 4.1. No third party representations have been received, consultation period has expired.

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Felixstowe Town Council	25 May 2022	9 June 2022
Summary of comments: Committee recommended APPROVAL and welcomed this addition to the tourism offer in Felixstowe.		

Non statutory consultees

Consultee	Date consulted	Date reply received
East Suffolk Head Of Coastal Management	31 May 2022	No response
Summary of comments: No response received; consultation period has expired.		

Consultee	Date consulted	Date reply received
Felixstowe Society	N/A	4 July 2022
Summary of comments: No objections.		

Consultee	Date consulted	Date reply received
East Suffolk Economic Development	25 May 2022	No response

Summary of comments:
No response received; consultation period has expired.

Consultee	Date consulted	Date reply received
East Suffolk Design And Conservation	25 May 2022	No response

Summary of comments:
No response received; consultation period has expired.

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	25 May 2022	26 May 2022

Summary of comments:
No objections.

Publicity

None

Site notices

General Site Notice

Reason for site notice: General Site Notice

Date posted: 17 December 2021

Expiry date: 12 January 2022

6. Planning policy

National Planning Policy Framework 2021

SCLP9.3 - Coastal Change Management Area (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.14 - Spa Pavilion to Manor End (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)

SCLP11.5 - Conservation Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP12.2 - Strategy for Felixstowe (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

7. Planning Considerations

- 7.1. The resort of Felixstowe, located on the coast and adjacent to the Area of Outstanding Natural Beauty (AONB), is a priority for new tourist activity, where improving the tourism potential is seen as an important element in achieving the regeneration of the town and where providing continued support in principle to the tourist industry remains a priority within the local plan. However, it is recognised that such support needs to be tailored to ensure that any expansion does not materially harm, in particular, the natural, historic and built environment assets that are the main attractions for visitors to the area and which are so important to the quality of life of local residents.
- 7.2. The land in question is covered by local policy SCLP12.14 (Spa Pavilion to Manor End), which sets out that development that encourages and promotes high intensity uses in the area will be supported provided they are of high quality and respects the town's heritage.
- 7.3. The section between the Pier and Spa Pavilion is advocated in the policy to promote cultural attractions which make a positive contribution to the conservations areas, respect the registered gardens and provide a link between the resort and the town centre.
- 7.4. The principle of siting a kiosk on this site has already been established, and as noted this is a replacement kiosk following the removal of the former Peters Ice Cream kiosk. The replacement will be of a similar footprint measuring 2.57m by 6.06m, with a height to the eaves of 2.54m. It would be sited on the existing concrete base and have a wider retail aspect with inclusion of other tourist related paraphernalia as set out in the design and access statement.
- 7.5. The new kiosk will utilise a converted shipping container, to be cladded and coloured in pastel colours. These are shown indicatively to be blue and white, though may be subject to change to other pastel colours. The form, scale and design are considered appropriate for the beachside location and are of a good visual appearance to positively contribute to the amenities of the promenade and support the tourism trade to the seafront.
- 7.6. The conservation area is not considered to cover the beachside, however the proposal will affect the setting of the conservation area. Given the scale of the development proposed and its form, the kiosk is not considered to negatively impact the setting of the conservation area, with the replacement being of a positive visual appearance appropriate to its function.
- 7.7. Given the context of the site with the former ice cream kiosk, another kiosk on the site is considered suitable and in accordance with the local policy covering this part of the seafront as the new kiosk will ensure a continued high footfall, with the kiosk of a high quality design at this important visual approach from the town centre down Bent Hill, maintaining the character and the link between the town centre activities and the seafront and its resort related activities and attractions
- 7.8. Minor development such as this is unlikely to raise significant flood risk issues. Although the site does not fall within the defined Coastal Change Management Area, it is located within a 30-metre risk zone landward of areas where the intent of management is to Hold the Line (HTL) as detailed in the Shoreline Management Plan 7. A Coastal Erosion

Vulnerability Assessment is therefore required to ensure that access to coastal defences is not inhibited by new and replacement development in accordance with SCLP9.3.

8. Conclusion

- 8.1. The proposed replacement kiosk is of a similar scale to that previously in situ, and the converted container is of an acceptable design that will not appear out of keeping given the location by the beachside. Replacing the kiosk will maintain the character of the area and its function and role in supporting the local tourist trade and providing a link between the resort activities further along the promenade and the town centre.

9. Recommendation

- 9.1. Authority to approve subject to the submission and confirmation from East Suffolk Council Coastal Management team that a 'Level B CEVA' submission satisfies their requirements.

Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be completed in all respects strictly in accordance with the application form, design and access statement, flood risk assessment, drawings 202201-01, 202201-02 received 16 May 2022.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. The kiosk shall only be in use between 8:00 and 18:00 Monday - Sunday (including bank holidays), and no work or deliveries etc shall be carried out outside of the specified hours

Reason: In the interests of amenity and protection of the local environment.

4. The development shall be carried out in accordance with the approved Level B Coastal Erosion Vulnerability Assessment, unless otherwise agreed by the local planning authority.

Reason: In the interests of coastal change management and to ensure that access to coastal defences is not inhibited by new and/or replacement development.

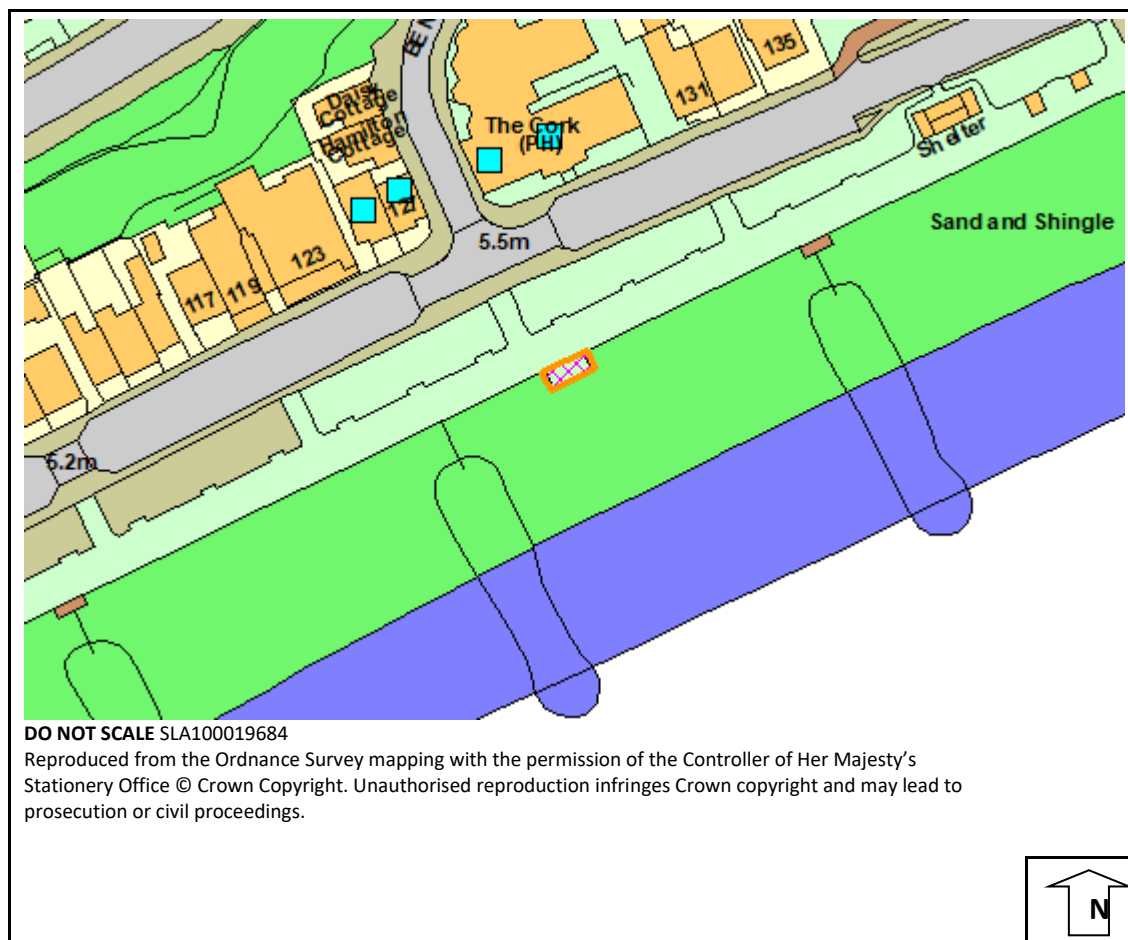
Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.

Background information

See application reference DC/21/5174/FUL on [Public Access](#)

Map



Key

- Notified, no comments received
- Objection
- Representation
- Support