



PLANNING COMMITTEE SOUTH - UPDATE SHEET 19 April 2022

Item 6: 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 - Land to the south and east of Adastral Park

Recommendation – para. 1.3 & 10.1

Recommendation rephrased to ensure members are fully aware that a re-consultation period is still open and is due to close on Friday 29 April. The two-week re-consultation period was requested upon receipt of a connectivity plan (drawing number: 22274/C11/CP).

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

Paragraph 3.4

Condition 10 amended to refer to public access connection.

Condition 11, which relates to site-wide access strategy, has been added to the list of condition to be addressed under the reserved matters submission.

Paragraph 4.2 & 4.3

Paragraph revised: 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. A re-consultation period, which was requested upon receipt of a connectivity plan (drawing number: 22274/C11/CP), is still open and is due to end on Friday 29 April.

Consultation tables updated to include the additional consultation date – 6 April 2021 – where applicable, and other amendments.

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT
DX: 41400 Woodbridge

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ
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Consultee	Date consulted	Date reply received
Brightwell Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	19 September 2021 20 September 2021
Summary of comments: "The Parish Council has no comments to make about this reserved matters application."		

Consultee	Date consulted	Date reply received
Bucklesham Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	4 November 2021 15 February 2022
Summary of comments: "No comment."		

Consultee	Date consulted	Date reply received
East Suffolk Design and Conservation	8 September 2021 13 September 2021 14 February 2022 15 March 2022	17 November 2021 17 February 2022 16 March 2022
Summary of comments: Internal consultee – comments included within reporting.		

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

Consultee	Date consulted	Date reply received
Kesgrave Town Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	27 October 2021 25 February 2022
Summary of comments: "Support."		

Consultee	Date consulted	Date reply received
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Kirton Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	4 October 2021
<p>Summary of comments:</p> <p>“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>		

Consultee	Date consulted	Date reply received
Martlesham Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	22 October 2021 28 February 2022
<p>Summary of comments:</p> <p><u>“Arboricultural Impact Assessment</u></p> <p>Martlesham Parish Council (MPC) is pleased to note that the majority of trees along the Ipswich Road are to be retained. MPC would like to see East Suffolk Council (ESC) confirm that any trees earmarked to be removed are of poor quality. Furthermore, MPC would like to see measures put into place for dealing with watering any newly planted areas. Environmental Action Plan: Part 2 February 2022 MPC is pleased to note that further detail has been provided regarding wildlife enhancement measures.</p> <p><u>Appendix 6:</u></p> <p>MPC is pleased to note the measures proposed to ensure that lighting impact on wildlife during the construction phase is minimised and that the detailed lighting design has been produced in accordance with the relevant guidance. MPC is pleased to note the lighting design consultants have made 5 recommendations in order to minimise the effect on the southern boundaries of phases E1 and E1A.</p> <p>We note that:</p> <ul style="list-style-type: none"> • All lighting should be LED • Rear shields should be used close to ecologically sensitive areas • There should be careful consideration of column heights • Lights should be mounted on the horizontal to avoid light spillage • MPC would ask ESC to confirm that these recommendations are fully carried through in the detailed design proposals. <p>Coloured Layout PL-02-E1 Revision C</p> <p>MPC would like to understand the following:</p> <ul style="list-style-type: none"> • What measures will be put in place to prevent visitor parking becoming permanent parking? • What are the arrangements for commercial van parking to ensure the overall 		

visual amenity of the site?

- Bin collection points are now indicated, but it is unclear where the refuse storage areas are located.
- MPC would welcome detailed proposals for grey water storage and water harvesting, given that this is a water scarce area.

Detailed Soft Landscaping Proposals

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

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

Consultee	Date consulted	Date reply received
Melton Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	9 September 2021
Summary of comments: “Melton Parish Council Planning and Transport Committee considered this application at its meeting on 8 September 2021 and has no comments to make.”		

Consultee	Date consulted	Date reply received
Newbourne Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Rushmere St Andrew Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Highways Department	8 September 2021 13 September 2021 14 February 2022 15 March 2022 6 April 2022	3 November 2021
Summary of comments: Holding objection.		

Consultee	Date consulted	Date reply received
Waldringfield Parish Council	8 September 2021 13 September 2021 14 March 2022 6 April 2022	22 October 2021 1 March 2022
<p>Summary of comments:</p> <p><u>1 March 2022</u></p> <p>"1. Access</p> <p>WPC previously commented on the conflicting statements made in the ARM/RMA applications regarding vehicular access points off the Ipswich Road and we sought clarification. We do not feel that this has been addressed as the information appears still to differ depending on which document/format is presented. The current Planning Statement Addendum is to highlight amendments to the previously submitted Planning Statement and “is to be read alongside the Planning Statements (relating to each individual phase) submitted with the applications in August 2021.” The Addendum makes no reference to the Access points so the statement made in “The Planning Statement relating to phase E1”, para 5.59 appears to still apply – i.e. “5.59 Access from Ipswich Road, will be a combination of enhanced and improved points of entry which were previously associated with the quarry activities that have since ceased on the site. Alongside new point of access which in the short term will provide a temporary exit route for construction traffic but over the lifetime of the development be converted into an emergency access point only”. We say that paragraph 5.59 requires amendment. It is misleading and appears to suggest that there will be several (i.e. more than two) vehicular access points off the Ipswich Rd. This does not conform with Outline Planning Permission DC/17/1435/OUT which included two points only of vehicular access/egress on Ipswich Rd. The first being (Ipswich Rd Eastern Access) the existing access route to the quarry and the second, a new access (Ipswich Rd Western Access). This second access was subject to Planning Condition 43, which requires “a design strategy to reduce traffic using this access, through traffic calming or street design” in order to “distribute traffic across the other accesses and to calm the effect of traffic on that junction in order to maintain the rural character of Ipswich Road”. Furthermore, in the recent (Feb 2022) BLCF meeting, in a response to a question about construction traffic access, Taylor Wimpey reiterated that the same access point that is used for aggregates access i.e. the existing route to the quarry, will be used for access/ingress of construction traffic.</p> <p>2. Street lighting</p> <p>WPC previously pointed out that no external lighting plan had been submitted, contrary to condition 61 of outline permission. Such a plan has now been submitted. It includes a great deal of detail describing the different types of lighting across different locations and sensitivities. To our untrained eye this appears to be appropriate but we are not really qualified to make technical comment.</p> <p>3. Car Parking</p> <p>The WPC expressed concerns, in particular regarding the design of the court parking schemes, found predominately in phase W1. We are pleased to see that there are no such parking courts in E1 as off-plot parking appears to be accommodated via allocated parking spaces on the edge of green space.</p> <p>4. Charging points for electric vehicles</p> <p>We are very disappointed to find no reference to this topic in the new ARM documents. In the</p>		

February BLCF, Taylor Wimpey detailed plans to install EV charging points. As a minimum, cables are being laid to allow their installation on all on-plot parking from the first dwelling. WPC would wish to see this commitment confirmed, possibly in a further addendum to the Planning Statement.

5. Energy efficiency

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

6. Ecology

WPC is pleased to see the firm commitments to produce targets and associated drawings (location and box design) for nest boxes for swifts, starlings and house sparrows and roosting boxes for bats (to include two pill boxes for bat roosts) as detailed in “Landscape and Ecology Management Plan (LEMP)” within “Part 2: Environmental Action Plan”.

7. Construction Method/Management Plan

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

8. Phasing & Timing

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

9. Previously submitted but undetermined ARMS

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

10. Design

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

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

1 March 2022

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

My criticisms are:

1 Not enough trees: Canopy deficiency

Small number of trees which are mostly narrowly fastigate trees offering little canopy. Tight planting of ornamental hedges round all housing necessitating frequent trimming. No groups of native trees and shrubs. The drawing only shows a part of the East site so I assume the remainder is unchanged.

2 No relevance to local species: biodiversity deficiency

The planting schedule is all as before therefore all the comments I made in the response of 22/10/21 still apply. Please note that Taylor Wimpey 'Strategy' states: "All new sites have planting that provides food for local species throughout the seasons" as quoted in the document from ecologists SES Part 2 environmental action plan. This strategy is not complied with in that few of the planted species will provide food for native species.

Natural England comments

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

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

In conclusion

The canopy effect will be very sparse even if all the trees grow to maturity. The 5m circles indicated would not be achieved with these narrow growing species so they are misleading. There is no relationship between the coastal location in Suffolk, with low rainfall and extremely sharp drainage, and the proposed vegetation on site. These proposals could just as easily be in any county in England. There are few 'native species' included and these are clones or varieties not the native growing ones e.g. clones of field maple and birch. In all the plans are not relevant to current thinking regarding tree canopy to help modify climate and provide shade and belong in the days when stretches of massed ornamental shrubs were carpeted out in housing areas."

22 October 2021

“Overall concept

The phases here detailed are residential developments, the first four areas of the several required to complete the site. The layout of these is necessarily quite tight incorporating houses and flats, garages and parking spaces, cycle storage, footpaths and roads. There are few opportunities left for landscape planting of trees, hedges, shrubs and herbaceous material, and grasses. However where these exist they have not been used to their full advantage.

Wildlife corridors

Although mention has been made of wildlife corridors in past documents these now seem to consist almost entirely of the peripheral bridleways which are already in existence for the main part and the necessary open spaces or SANGs including the main one around the lake not yet fully designed. There is no attempt to take the wildlife corridor into the housing development where it might link up with gardens. In these layouts gardens do not back onto open areas but very largely onto other gardens meaning they are surrounded by tall (1.8m) grey closeboard fencing. The back gardens are turfed. There are no trees or climbers in the gardens whatsoever native or otherwise (see condition 12).

Proposed Trees

Proposed trees are spaced 15m apart along both sides of main access roads. Trees within the development are a mere sprinkle. There are no groups of trees of different sizes and species. There are many dwellings within the development where there will not be a single tree visible from a window until residents (hopefully) start to plant them.

Tree canopy on maturity

On the planting plan all proposed trees of whatever species or initial planting size are shown as circles of diameter 5m. It is not known at what stage of their development they are meant to be illustrated. However many are very narrowly fastigate trees. These are suited to restricted spaces such as city courtyards. There is a lot of the upright growing field maple *Acer campestre* Streetwise. This is predicted to reach a diameter of 3m after 25 years (using data from Hillier Nurseries). *Carpinus betulus* Franz Fontaine will reach 2.5 crown diameter, ornamental cherry *Prunus Amanogawa* only 1m wide after 25 years. Fastigate birch may make 1.5m wide spread and *Pyrus Chanticleer* (ornamental pear) 3m. Therefore all of these will be much narrower columns than shown on plan. Only *Acer Elsrijk* may reach 6m after 25 years and *Liquidambar* is predicted to reach 5m diameter. The others would be much smaller than the circles shown on the plans, half as big or less in some cases. These severely upright trees cast less shade, and are mostly without the contrast of more spreading forms as shown on the optimistic illustrative sections. They will not provide much leafy mass to complement the buildings. The exception Silver Birch is a native tree but shortlived. It has a limited lifespan of 60-80 years. There are very few shown although these are very good for wildlife supporting many insect species.

Species of trees selected

The cultivar of Field Maple Streetwise is a clone. Therefore although providing food for wildlife in the seeds and leaves they are identical genetically which would mean a disaster if a disease struck. All the cultivars are genetically identical so similarly the cultivars of Hornbeam would be identical with each other. Among the tree species represented there are no oak, which is the main forest tree in this area in the woods bordering the larger overall site to the north and west. There is no hazel, no willow, no holly and in fact there are no native shrubs whatsoever. It seems that the wildlife travelling through will not find much sustenance. There are no pines to tie in visually with the existing tree belt of Austrian Pine, with one exception.

Survival of trees

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

Shrubs: maintenance

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

Use of poisonous shrubs

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

Non-native shrubs

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

Basin (in E1)

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

Swales

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

Private gardens

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

Suggestions for greening the site

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

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.

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.

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.

Native hedges could be incorporated in some areas including fruiting plants for wildlife such as hawthorn, elderberry, dogrose, cherry plum, dogwood, holly, which all grow in the area.

In conclusion

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

Consultee	Date consulted	Date reply received
Woodbridge Town Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	7 October 2021 2 March 2022

Summary of comments:

2 March 2022

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

6 October 2021

“In July 2017 Woodbridge Town Council recommended refusal of application DC/17/1435/OUT due to concerns about the suitability of the site for development and the likely negative impact to the already congested A12 at Martlesham which is the primary access route for Woodbridge residents and visitors travelling to and from the south and west. Four years on, with extensive further retail and commercial development east of the A12 north of this development at Martlesham Heath Business and Retail Park, we have reviewed that position in the light of the four applications DC/21/4002-4005/ARM. Woodbridge Town Council consider that the mitigation proposals contained within the applications for managing and minimising traffic flows to and from, as well as within this development are inadequate both in terms of extent and timetabled implementation strategy during the stages of development of the land south and east of Adastral Park. Our concerns are exacerbated by the expected increase in traffic movements on the A12, up to around 2036, as published by the Applicant for Sizewell C at the for Sizewell C DCO Examination.

Woodbridge Town Council ask that, if ESC is minded to approve the applications, ESC require prior to approval further details on how the Applicant will encourage non-vehicular and public transport movements of residents between the development and the retail/commercial facilities at Martlesham Heath Business and Retail Park. We consider the Applicant proposals do not currently positively encourage walking and cycling and there is no provision for direct off A12 bus services to the facilities. We consider the application requires as a minimum a detailed strategy for mitigation against a potential increase in short distance car journeys to retail and commercial facilities Woodbridge Town Council are deeply concerned by the lack of detail in the application on the above and other aspects, notably drainage as highlighted by Suffolk County Council. The Committee echoes the comments of Kirton and Falkenham Parish Council. The Climate and Ecological Emergency Committee have commented to the Planning Committee that they have the following ecological and environmental concern alongside the matter of sustainable transport strategy as mentioned above; - We would ask that if ESC is minded to approve the applications a condition is included to extend the period until the end of July for which protection is provided to nesting birds in the development areas, - We further recommend, if ESC is minded to approve the applications, that a condition is added that no artificial interference to nesting birds such as the pre netting of trees and hedgerows would be permitted on the development areas. In general, we are deeply concerned by the lack of detail in the application and therefore, with all of the above considered, recommend REFUSAL of this application.”

Consultee	Date consulted	Date reply received
Bucklesham Parish Council	13 September 2021 6 April 2022	4 November 2021 15 February 2022
Summary of comments: <u>15 February 2022</u> “No comment” <u>4 November 2021</u> “No comment”		

Consultee	Date consulted	Date reply received
Newbourne Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Rights Of Way	6 April 2022	No response
Summary of comments: No response.		

Item 7: 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/20/1234/VOC - Land to the south and east of Adastral Park

Recommendation – para. 1.3 & 10.1

Recommendation rephrased to ensure members are fully aware that a re-consultation period is still open and is due to close on Friday 29 April. The two-week re-consultation period was requested upon receipt of a connectivity plan (drawing number: 22274/C11/CP).

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.

Paragraph 3.6

Condition 10 amended to refer to public access connection.

Condition 11, which relates to site-wide access strategy, has been added to the list of condition to be addressed under the reserved matters submission.

Paragraph 4.2 & 4.3

Paragraph revised: 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. A re-consultation period, which was requested upon receipt of a connectivity plan (drawing number: 22274/C11/CP), is still open and is due to end on Friday 29 April.

Consultation tables updated to include the additional consultation date – 6 April 2021 – where applicable, and other amendments.

Consultee	Date consulted	Date reply received
Brightwell Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	19 September 2021
Summary of comments: “The Parish Council has no comments to make about this reserved matters application.”		

Consultee	Date consulted	Date reply received
Bucklesham Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	4 November 2021 15 February 2022
Summary of comments: <u>15 February 2022</u> “No comment.” <u>4 November 2021</u> “No comment.”		

Consultee	Date consulted	Date reply received
East Suffolk Design and Conservation	8 September 2021 13 September 2021 14 February 2022 24 March 2022	17 November 2021 17 February 2022 16 March 2022
Summary of comments: Comments incorporated within reporting.		

Consultee	Date consulted	Date reply received
Hemley Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Kesgrave Town Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	27 October 2021 25 February 2022
Summary of comments: <u>25 February 2022</u> "Support" <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."		

Consultee	Date consulted	Date reply received
Kirton Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	4 October 2021
Summary of comments: "Kirton & Falkenham Parish Council considered this application at its meeting in 20th September 2021 and objects to the proposals, having severe reservation about generated traffic that will put utmost strain on an already over capacity road network which relies on the main arterial roads (A12/A14) to allow cars and HGV's to travel to and from work etc. This is a peninsular, so alternative routes are unavailable as Ipswich is very quickly gridlocked. Noise, light and construction dust pollution will have a massive effect on wildlife and existing homeowners in what		

is a tranquil area. All surface water will inevitably flow into the Mill River and surrounding watercourses leading to potential flooding downstream.”

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

Summary of comments:

28 February 2022

“Martlesham Parish Council (MPC) is pleased to note that the majority of trees along the Ipswich Road are to be retained. MPC would like to see East Suffolk Council (ESC) confirm that any trees earmarked to be removed are of poor quality. Furthermore, MPC would like to see measures put into place for dealing with watering any newly planted areas.

Environmental Action Plan: Part 2 February 2022 MPC is pleased to note that further detail has been provided regarding wildlife enhancement measures. Appendix 6: MPC is pleased to note the measures proposed to ensure that lighting impact on wildlife during the construction phase is minimised and that the detailed lighting design has been produced in accordance with the relevant guidance. MPC is pleased to note the lighting design consultants have made 5 recommendations in order to minimise the effect on the southern boundaries of phases E1 and E1A. We note that: • All lighting should be LED • Rear shields should be used close to ecologically sensitive areas • There should be careful consideration of column heights • Lights should be mounted on the horizontal to avoid light spillage • MPC would ask ESC to confirm that these recommendations are fully carried through in the detailed design proposals. Coloured Layout PL-02-E1 Revision C MPC would like to understand the following: • What measures will be put in place to prevent visitor parking becoming permanent parking? • What are the arrangements for commercial van parking to ensure the overall visual amenity of the site? • Bin collection points are now indicated, but it is unclear where the refuse storage areas are located. • MPC would welcome detailed proposals for grey water storage and water harvesting, given that this is a water scarce area. Detailed Soft Landscaping Proposals JBA-18/163-8,9,10,11 and 12 Revision C The revised landscaping proposals show areas to be seeded with wildflowers between the car parking and the joint cycling and walking track connecting Ipswich Road to the Boulevard. Given the density of parking provision and the narrowness of the parking access, it is unclear how this area is to be protected from unofficial parking. If a knee rail is to be provided, this is not shown in the key on the drawing. The overall visual and biodiversity impact of the proposed arrangement would be poor if these areas were to become a carpark and would lead to frustration on the part of residents and visitors.”

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 i 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 ii in Martlesham • The Woodbridge Town FC Policy 12.25 for 120 dwellings • East Anglia One and Three, and the • McCarthy Stone Retirement Development iii .

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.

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 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.

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 v 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.

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 Strategy vi 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."

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 x 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.

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.

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.

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.”

Consultee	Date consulted	Date reply received
Melton Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	9 September 2021
Summary of comments: “Melton Parish Council Planning and Transport Committee considered this application at its meeting on 8 September 2021 and has no comments to make.”		

Consultee	Date consulted	Date reply received
Newbourne Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
Rushmere St Andrew Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	No response
Summary of comments: No response.		

Consultee	Date consulted	Date reply received
SCC Highways Department	8 September 2021 13 September 2021 14 February 2022 24 March 2022 6 April 2022	5 November 2021 2 March 2022
Summary of comments: No objection subject to conditions.		

Consultee	Date consulted	Date reply received
Waldringfield Parish Council	8 September 2021 13 September 2021 14 February 2022 6 April 2022	22 October 2021 1 March 2022
Summary of comments: <u>1 March 2022</u> “I have been examining available landscape drawings looking for any sign of changes to increase biodiversity of the proposals. The only new drawing relevant to landscape appears to be: JBA Soft Landscape Proposals 24.01.22 amended to new layout. This shows part of the east site. It does not have a schedule of plants but I assume this is the same as on the previous version and all planting		

appears as before. My criticisms are:

1 Not enough trees: Canopy deficiency

Small number of trees which are mostly narrowly fastigate trees offering little canopy. Tight planting of ornamental hedges round all housing necessitating frequent trimming. No groups of native trees and shrubs. The drawing only shows a part of the East site so I assume the remainder is unchanged.

2 No relevance to local species: biodiversity deficiency

The planting schedule is all as before therefore all the comments I made in the response of 22/10/21 still apply. Please note that Taylor Wimpey 'Strategy' states: "All new sites have planting that provides food for local species throughout the seasons" as quoted in the document from ecologists SES Part 2 environmental action plan. This strategy is not complied with in that few of the planted species will provide food for native species.

Natural England comments

Also I would draw attention to the comments from Natural England which makes many of these points on page 2 of its letter of 11 October 2021, plus a lot more, under other advice, Landscaping, and which I wholly endorse. "2) Other advice In addition, Natural England would advise on the following issues. Landscaping The detailed landscape proposals indicate a large number of ornamental shrubs/trees which have little value for native wildlife. Ideally planting within residential areas would maximise benefits for biodiversity. Opportunities for enhancement might include: • Planting more trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds". This would require a re-think of the layout as in the current design no room is left for wildlife apart from narrow strips between hard areas. Biodiversity here seems to be providing a lot of boxes but little 'natural' habitat. 3 No trees or climbers within gardens and none (apparently) to be offered In conclusion The canopy effect will be very sparse even if all the trees grow to maturity. The 5m circles indicated would not be achieved with these narrow growing species so they are misleading. There is no relationship between the coastal location in Suffolk, with low rainfall and extremely sharp drainage, and the proposed vegetation on site. These proposals could just as easily be in any county in England. There are few 'native species' included and these are clones or varieties not the native growing ones e.g. clones of field maple and birch. In all the plans are not relevant to current thinking regarding tree canopy to help modify climate and provide shade and belong in the days when stretches of massed ornamental shrubs were carpeted out in housing areas."

22 October 2021

"We would like to thank the officers from ESC and the representatives of the applicants for organising and attending the two virtual meetings held on October 15th. Both meetings were extremely helpful. Most of the issues we wish to raise apply to each/all of the applications listed above and this response is sent in respect of each of the 4 ARMs. Our comments are based primarily on assessing the information included in these applications against conditions in the Outline Planning Permission DC/17/1435/OUT. We have arranged our comments by topic.

1. Access

The applications include statements that are ambiguous and in some cases contradictory, here are some examples: "The main access to the Site is from Ipswich Road located on the southeast. A further vehicular access is proposed from the Boulevard Spine Road which links to the main access via the proposed primary road." (DCS Phase E1, §3.13). (Our emphasis). It is not clear from the

above paragraph whether the reference to the “Site” relates to the entire Brightwell Lakes site or just the area of phase E1. Also it doesn’t specify if the access to Ipswich Rd is the East Ipswich Rd access or the West Ipswich Rd access. “The main vehicular route into Phase E1 is located on the south-east providing access to Ipswich Road and the wider highway network. A secondary access is to be created from the Spine Road ...” (Phase E1 Planning Statement, §3.3) (Our emphasis). In more recent discussions with the applicants we have been informed that “Once occupied, residents will only be able to access the site via the new A12 junction and the Eastern Ipswich Road access points.” (Our emphasis.) Is this the entire Brightwell Lakes site or just the area of phase E1? “Alongside new point of access which in the short term will provide a temporary exit route for construction traffic but over the lifetime of the development be converted into an emergency access point only.” (Phase E1 Planning Statement, §5.59) (Our emphasis). Subsequent discussions with the applicants indicated that the above paragraph is referring to West Ipswich Rd access but this is not clear from the statements in the ARMs. Is this to be seen as VOC of Condition 43, or is it an error? We would ask that the ARMs are amended to ensure that there is complete continuity and consistency across all the statements on the matter of the access routes within the ARMs in order to comply with outline planning consent conditions and avoid misunderstandings/confusion. The outline planning permission is clear that the primary access point is to be a new traffic signal controlled 3 way junction on the A12 between the existing Foxhall Road and BT roundabouts. Two secondary access points are proposed onto the Ipswich Rd.

2. Charging Points for Electric Vehicles

The move towards electric vehicles (EVs) has accelerated considerably since the outline planning consent in 2018. The UK Government intends to pass legislation (which will come into law in 2022) which will mandate EV charging points on all new buildings: “We will publish our consultation response on requiring all new residential and non-residential buildings to have a charge point, and we intend to lay legislation later this year,” (Department for Transport Minister Rachel Maclean. <https://earth.org/uk-to-be-first-country-to-require-new-homes-to-have-built-in-ev-chargers/>) We are not planning lawyers but this would seem to override the now outdated planning condition 64. “Prior to the submission of the 1000th dwelling for layout reserved matters approval, an electric vehicle charging strategy shall be submitted” (Planning Condition 64). Even without the anticipated new legislation this planning condition has been overtaken by the rapid development of technology and sales and is now in conflict with: “ESC Policy SCLP7.2. c) Proposals involving vehicle parking will be supported where they take opportunities to make efficient use of land and they include: c. Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles;” This is referred to in the both the E1 and W1 Planning Statements, §4.18. However, there is no mention in any of the four ARMs of charging points for electric vehicles, either attached to the houses or in the parking courtyards, or on the street. Given that all new cars sold from 2030 onwards are to be EVs, it is essential that all homes and all parking courtyards have EV charging points. If the charging strategy (let alone the actual charging points) is delayed until plans for 1,000 houses have been submitted, that will be far too late. What would happen to the plots that have already been built? Either they would be left without public charging points, or charging points would have to be retro-fitted, which would be disruptive and expensive. We appreciate there are complications with management companies and a rapidly changing technology, and that charging points are covered by building regulations rather than planning, but feel that a general statement of strategy from both ESC and the applicants would be helpful.

3. Street Lighting

There is no mention of street lighting and the need to avoid light pollution. There are some welcome statements in the Environmental Action Plan, Appendix 6: CEMP Ecology Method

Statements, Protection from lighting disturbance, but this is solely about the construction phase (CEMP = Construction Environmental Management Plan). Following subsequent discussions with the applicants we understand that the details of the external lighting will now be submitted as an addition to the ARMs to comply with condition 61 “As part of each layout reserved matters application, details of external lighting to be installed ... shall be submitted to and approved” (Planning Condition 61) We would ask that consultees are given the opportunity to comment on these later submissions.

4. Construction Phases

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

5. Car Parking

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

6. Energy Efficiency

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

7. Phasing and Timing

Although a phasing map is provided, there are no accompanying dates or even approximate timings. Some timings have been provided elsewhere, for example in the slides which were presented to the Brightwell Lakes Community Forum in June 2021, but without this information in the ARMs it is difficult to get a clear picture of how these four phases fit in to the bigger picture. We ask to be provided, as part of the ARMs, a timing sequence of the start and completion dates of: • Ipswich Rd access West • Ipswich Rd access East • A12 junction • 'Spine' road (boulevard) • Phases W1, W1a, E1 & E1a • SANG (various areas)

8. Previously submitted but undetermined ARMs

We understand from subsequent discussions with the applicant and ESC that the applicants are currently reviewing/amending the two extant ARMs DC/18/2774/ARM (infrastructure) and DC/18/2775/ARM (SANG), and that these revisions will shortly be submitted to ESC. We ask to be

notified and invited to comment on the changes.

9. Phase E1a

The Phase E1 Landscape Masterplan (JBA18/163-SK02) clearly shows the E1a area covering 9 houses, whereas all the other plans show E1a covering a much smaller area of just 3 houses. We have learnt in subsequent discussions that E1a will now consist of just 3 show houses.

10. Landscaping & Arboriculture

WPC's Tree Warden has submitted comments on the landscaping and arboriculture aspects separately, and WPC fully endorses these."

"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.”

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

Summary of comments:

8 March 2022

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

2 March 2022

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

7 October 2021

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

condition is included to extend the period until the end of July for which protection is provided to nesting birds in the development areas, - We further recommend, if ESC is minded to approve the applications, that a condition is added that no artificial interference to nesting birds such as the pre netting of trees and hedgerows would be permitted on the development areas. In general, we are deeply concerned by the lack of detail in the application and therefore, with all of the above considered, recommend REFUSAL of this application.”

Consultee	Date consulted	Date reply received
SCC Rights of Way	6 April 2022	No response
Summary of comments: No response.		

Item 8: DC/20/5279/OUT - Outline planning application with some matters reserved (access to be considered) for a phased scheme for the erection of up to 139 new homes (including provision of up to 46 affordable homes), land for a two-form entry primary school with pre-school, open space, SUDS, meadow and informal path on land south of Gun Lane, and all associated infrastructure provision - Land adjacent to Reeve Lodge, High Road, Trimley St Martin

Paragraph 4.2 & 4.3

Amended to:

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

4.3 Full consultation responses are available to view on Public Access.

Amendment(s) to consultation responses:

Consultee	Date consulted	Date reply received
Kirton Parish Council	12 February 2021 13 August 2021	12 February 2021 7 September 2021

Summary of comments:

7 September 2021

“Kirton & Falkenham Parish Council has no comments on this application.”

12 February 2021

“Objection – from Kirton and Falkenham Parish Council. As villages connected with Trimley St Martin through proximity, shared shops and a shared school, the Council is concerned over road safety issues caused by the increase in housing from this and several other developments. Its position remains that it wishes to see the retention of the existing, successful school on its current site, complemented by a new, single-form entry school near Reeve Lodge. Should this not happen, it would be very worried about the safe travel of parents, carers and children to the proposed new primary school from the northern end of Kirton. There are three possible routes.

1 The A14 J59 roundabout, useable by cars, cycles and, theoretically, those on foot. This is a busy roundabout, dangerous for cyclists and pedestrians: it is not a good option for school traffic unless using cars.

2 The footbridge over the A14 from near Roselea Nursery to the Old Kirton Road. This is the main link between the two villages for non-motorised traffic. It is, however, old, narrow, low, exposed, not in a brilliant state of repair and not an attractive prospect for the daily commute to school.

3 The Candle Track from Capel Hall Lane, via an underpass to Thurmans Lane, Trimley St Mary. This is barely passable on foot and needs an off-road bicycle. It is certainly not suitable for a parent or carer with push chair, toddler and one or more schoolchildren.

Clearly Trimley St Martin pupils could use these foot and cycle routes now; in fact, they are more likely to travel by car – and they knew this when they moved to live in that village. The housing in the North of Kirton is such that families unable to use a car for school journeys are likely to live

here rather than in the more expensive, larger properties further into the village. They expected only a 20-minute walk to school when they settled here. If the established school on Kirton Road is closed, families living in Weir Place, for example, will be faced with a daunting 40 to 56 minute walk or an 11 to 15 minute cycle ride to the new school: clearly repeated four times a day. This is a significant expectation for a young parent or carer. The Local Plan supports sustainable travel; with improvements to the bridge or a new cycle path these problems could be mitigated. The extent to which CIL and Section 106 contributions could be used for such improvements or whether a school bus could be deployed are matters that the Council would like to discuss with those concerned. The Council is quite clear, however: Kirton and Falkenham pupils must be enabled safely and effectively to get to school without using a car.”

Consultee	Date consulted	Date reply received
Trimley St Martin Parish Council	5 January 2021 13 August 2021	26 January 2021 26 April 2021 8 September 2021 14 December 2021

Summary of comments:

14 December 2021

“At their meeting on 7 December, Trimley St Martin Parish Council resolved to submit this additional comment on the application as a result of an issue which has caused some concern in the community. The applicant's revisions to the outline application include a reference to the availability of the children's playground located at the end of Goslings Way. The relevant paragraph in the summary of changes reads as follows: "The creation of a green corridor through the Site which links the new meadow area with the originally proposed public open space to the north of the school site. Along this green corridor, a pocket park including a Local Area of Play for children and the route connects the scheme to the adjoining play area within the neighbouring scheme to the north west of the school site. This will provide a pleasant, landscaped route through the scheme with trees and planting which will encourage local wildlife into the scheme." The Goslings Way play area it is not managed by the Parish Council. Like all the open space on the scheme it is maintained by a management company and the cost of this is met by Goslings Way and Nigel Way residents. It is important to recognise that the proposals for the site adjacent to Reeve Lodge indicate that an additional burden would be placed on this play area and in these circumstances it would be appropriate for the developer to contribute to the maintenance costs to avoid an increased burden being placed on the Goslings Way/Nigel Way residents.”

8 September 2021

“Trimley St Martin Parish Council discussed this application at their meeting on 7th September. The PC welcomes the inclusion of the additional land in the application, but would like to see part of that additional space allocated for use as an open, mown recreational space which could sit alongside the wildflower meadow and help meet the needs of older children and teenagers. It will be essential that the use of the land for ecological and recreational needs is protected by inclusion in the s106 agreement. Other concerns identified in the Parish Council response of 27 January 2021 are reiterated.”

26 April 2021

“As you may be aware, concern about the impact of development on traffic flow and air quality in Trimley St Martin runs high; as a result Trimley St Martin Parish Council resolved to seek a third

party review of the transport assessment for the proposed development of the site adjacent to Reeve Lodge. The third party review has now been completed by Vemco Consulting and was accepted by the Parish Council Planning Committee at their meeting on 22 April. A copy of the review is attached for your attention. You will see from the report that the consultants identified some errors in the execution of the assessment, but the primary concerns relate to the design proposals for the 5th arm of the Howlett Way/High Rd roundabout, the need to remodel future year scenarios to reflect the necessary changes, and the need to review and revise the accident analysis. Full details are provided in the summary and actions section of the review which starts on page 22.”

27 January 2021

“Objection

1. The Planning Committee of Trimley St Martin Parish Council considered this application at their meeting on 20 January. Their comments are as follows:

Site Layout:

Housing

2. Policy SCLP12.65 relates specifically to this allocation within the Local Plan. The policy calls for a mix of housing including housing for older people, but this application reflects a lack of clear provision for the elderly. It is understood that the plans provide for 13 one bedroom flats within the affordable mix, but only 6 of these will be ground floor units. Of the 4 market rent flats, 2 will be ground floor units. No commitment is given to ensuring that these ground floor flats will be designed with the elderly in mind. Aside from the flats there are just two bungalows. These are three-bedroom, wheelchair accessible dormer bungalows and appear to be geared more to the needs of families with a disabled member rather than the needs of the elderly. From the proposed layout it appears that within the 139 dwellings the reality is that no specific provision has been made for the elderly. Although it is recognised that the proposed layout is indicative, it would seem sensible to factor in the provision of bungalows at the outset as their larger footprint would surely render them more difficult to allow for later.

Site Layout: Open Space

3. The developer estimates the total number of occupants of the dwellings at 312, but, if one applies the occupancy density set out by the Housing Strategy & Enabling Manager in her comments on the application, the total number of occupants can be expected to exceed 600. The open space requirement based on the figure of 312 is 0.75ha and the proposed open space allocation is a fraction larger at 0.8 ha, however when set against the more realistic figure of 600 the open space allocation is only a little more than half of what is required. It follows that significantly more open space is needed than has been provided. 4. The area of land which has been identified for open space is also shown as the location of the SuDS attenuation ponds, and it is bisected by a public right of way. Although it may be suitable for limited activities, it certainly would not be capable of meeting all the needs associated with open space such as the opportunity for young people to play ball games. The Parish Council recognises that the area of land on the other side of Gun Lane, originally intended to form part of this site, is now to be retained as agricultural land. To meet the needs of the community this plot should be allocated for open space, this would be possible to meet the needs of the community whilst at the same time addressing the need to avoid the coalescence of Trimley St Martin and Trimley St Mary.

Site Layout: Parking

5. The provision for parking by residents and their visitors is inadequate. The development is accessed off a roundabout and there is no street parking available nearby. Inevitably residents will

park on the road in front of their houses rather than using the limited parking provision available to them, a scenario which is clear to see at other developments nearby. In this instance problems will be exacerbated by parents and carers parking on the development to drop children off at the school. In addition, parents who have dropped off their children will have to exit via the narrow residential roads as there is no turning circle provided at the end of the main entrance road.

Transport – Impact of Increased Number of Dwellings and Relocation of the Primary School

6. As this application is one of four which are at various stages of progression through the planning process, the view of the Parish Council is that the combined impact of all developments must be examined; a piecemeal approach is not acceptable.

7. The transport assessment is included with the EIA screening application DC/20/5239/EIA. Parish Councillors have been advised that figures relating to traffic volume, projected forward to 2027 and 2036, have been calculated to reflect the impact of all committed scheme sites. It is difficult to see how this can be so. The number of dwellings in Trimley St Martin alone will increase by more than 50% and yet the figures presented suggest that traffic flow will increase by a very small % indeed. In the circumstances the basis on which the calculations have been made must be questioned.

8. The Parish Council would like to see a clear explanation, setting out the assumptions underlying the traffic flow calculations and the projections relating to air quality. In particular, they take the view that the number of trips which will be generated by the school has been vastly under-assessed. As can be seen clearly from the parking around the school in its existing location large numbers of parents choose to drive their children to school. Parking is a very real problem and it will continue to be a very real problem when the school relocates. The vehicular entrance to the school is located off a roundabout, inevitably parents and carers will park on the main access road or on the roads within the development itself. It is difficult to see how this can result in anything other than chaos.

Transport – Safety Issues

9. The site is allocated for a two-form entry primary school and an early-years unit. To make it safe for children to walk to school it will be essential to provide controlled crossings on all approaches to the site so that children can cross Howlett Way and the High Rd safely. These need to be in place before the school opens. By the same token '20's Plenty' and 'School Ahead' signs will be needed on all approaches.

10. Some cyclists and pedestrians will enter or leave the site via Gun Lane. The intention appears to be that they will use the residential roads on the development to travel between Gun Lane and the school. This is not a workable solution on grounds of safety – the use of tandem parking on the development means that residents will either opt for roadside parking or be faced with the need to make frequent manoeuvres, especially if the driver parked furthest from the road needs to leave before the driver parked at the rear. Inevitably drivers will be reversing into the path of children who are walking or cycling to school in a situation where kerbside parking reduces visibility. It follows that dedicated footpath/cycleway provision should be entirely separate from the pedestrian access.

11. Within the wider area, all cycleways must be fit for purpose. This development is one of four which will increase the number of children cycling to the primary school, and to Felixstowe Academy. The cycleway which runs along the High Rd towards Felixstowe is poorly defined and cannot be used safely because drivers park across it. Cycleways must be very clearly defined and

parking across them must be prohibited. Without these simple provisions children will not be able to cycle safely to school. There must also be clear provision for children cycling from Kirton who will cross the A14 via the footbridge ready to remount their cycles in Old Kirton Road.

Unmet Community Needs

12. There is no provision on this site for additional community facilities, the same is true of the other committed sites in the village. The vast increase in the population of the village will increase the demand for community meeting space and members call for this to be addressed. The school cannot fulfil this need, even though space may be available for hire in the evenings, there will still be an unmet need for facilities during the day.

Sustainable Energy

13. The Parish Council objects to the proposal to heat the dwellings by gas. A new build offers opportunities for innovative solutions such as the use of heat pumps which are much more expensive and troublesome to fit retrospectively – the opportunity should not be set aside. Members expect to see a real and demonstrable commitment to sustainable energy including the use of solar panels where appropriate.”

Consultee	Date consulted	Date reply received
Trimley St Mary Parish Council	26 January 2021 13 August 2021	22 February 2021 23 February 2021 6 September 2021

Summary of comments:

6 September 2021

“The Parish Council reiterates the comments submitted in February 2021 in relation to this application.”

22/23 February 2021

“There will be a significant impact on the residents of Trimley St Mary as a result of this proposed development, primarily in relation to transport. The Parish Council take the view that the traffic flow calculations and predictions have been under-assessed and the numerous anomalies in the Transport Assessment fundamentally undermines it. For example:

- The roundabout is referred to as both 4 arm and 5 arm however traffic flow modelling has been based on 5 arm – there was virtually no traffic from the rail compound during the survey, in reality the roundabout is 4 arm and should be modelled as such. The existing agricultural access is also ignored.
- No account is taken of traffic that may be generated from the proposed Howlett Way and other ongoing developments and the proposed changes to the roundabout contradict the proposals from that application. There needs to be modelling and a proposed mitigation based on all developments combined. The High Rd is an extremely busy road and entering it from one of the many side roads is now challenging during busy periods. Further development will only exacerbate this issue. Studies have presented analysis that assures planners that some 90% of local traffic will use the A14 to travel to Felixstowe, this is completely unfounded. Whilst it is possible to accept that the A14 does carry a significantly higher volume of traffic than the High Rd, local traffic tends to choose the High Rd for

numerous reasons. A recent roadside origin survey showed that, on average, 76% of traffic exited towards Felixstowe via the High Rd. The vast majority of local traffic will continue to use the High Rd and the cumulative volume of increased traffic from the new developments will result in a constant stream of traffic. There are already bottlenecks that regularly causes traffic incidents. There is no provision for cyclists to safely traverse the busy junction that will be created by the site. All Trimley St Mary (indeed all Felixstowe) road cycling traffic must pass through this roundabout. This is a significant volume of cyclists. Data shows that, during the Spring/Summer months, there were in excess of 4,500 cycling trips per month, in Winter there were 1,840. The cycleway along the whole length of the High Rd is in need of repair and repainting and cannot be used safely. More detail is needed to describe how the safety of these cyclists will be provided for. Observation of parking outside Trimley St Martin School makes clear the demand for vehicular access during drop-off/pick-up times, demand generated by the new school could impact traffic passing through the roundabout. There is no turning facility provided and Table 5.3 shows an excess of 54 vehicles at the school at 9am. Parents will both park and turn in the narrow residential roads causing local obstruction and hampering emergency access. While the document attempts to present a scenario where more children walk to school due to its location nearer to the centre of the population, the school also serves Kirton and many pupils who now walk will revert to driving. A more detailed study of the current and predicted origin of pupils at the school must be included to form a proper assessment of the traffic flow and impact of the school.

- SEWERAGE: The system is almost at capacity with Anglian Water imposing time constraints on recent and planned developments for pumping out of storage tanks into the main system, there has been no response to the planning application to date from Anglian Water and the parish council has concerns over the capability of AW to deal with demand.
- SPORTING PROVISION: Recreational facilities at the proposed school should be of sufficient size and standard to be made available to the local community outside of school hours and help fulfil the lack of facilities within Trimley St Martin.
- LAND EAST OF GUN LANE: It is important that this area of land be protected from development and to help address the need to avoid coalescence between Trimley St Mary and Trimley St Martin. The Parish Council proposes that the land be given to Trimley St Mary Parish Council for recreational purposes along with a sum of money via a S106 agreement to both extend the allotments and provide recreational space. Landscaping and provision of car parking will provide both an attractive access to the AONB and walks to the south and enhance the eastern border of the proposed development.”

Paragraph 8.4

This application seeks outline permission for ‘up to’ 139 new homes at 26.8 dwellings per hectare (dph). Whilst the quantity of dwellings is less than the ‘approximately 150 dwellings’ suggested in the allocation policy, the density is higher compared to the **policy provision** of 23.5 dph (taking into account the 2.2 hectares for school provision). This is broadly in accordance with the policy objectives and is considered acceptable subject to compliance with all other respective policies.

Paragraph 8.19

Policy SCLP8.2 (Open Space) of the local plan, supports the provision of open space and recreational facilities and their continued management across the plan area. This is mainly to

encourage active lifestyles and to increase participation **in formal** and informal recreation for all sectors of the community, and also to support biodiversity, promote effective water management and to enhance the public realm. The residential development will therefore be expected to contribute to the provision of open space and recreational facilities in order to benefit community health, well-being and green infrastructure.

Paragraph 8.22

Applying this formula to the scheme equates to a requirement of 0.75ha of open space, based on an assumed occupancy of 312 persons ($312/1000 \times 2.4 \text{ hectares} = 7,488 \text{ m}^2$), which the proposal far exceeds with the incorporation of **1.5 hectares of open space** to the south of Gun Lane, with further open space located in the north west extent of the site, adjacent to the existing Trimley St Martin Play Area and the settlement edge at Goslings Way.

Additional condition proposed

Prior to the commencement of development (including any clearance or operations), a Materials Management Plan shall be submitted to and approved by the local planning authority, in consultation with the mineral planning authority. The approved plan shall be implemented in its entirety and shall thereafter be retained and maintained in its improved form.

Reason: In the interests of assessing the quality and quantity of sand and gravel resources on site in order to determine whether on-site resources should be used on-site during development, in accordance with Policy SCLP12.65 of the local plan.

Item 11: DC/22/0345/FUL- Two-storey rear extension at 735 Foxhall Road, Ipswich, Suffolk IP45TH:

Additional Information from architect:

An email has been received from the architect for the application making reference to the following previous applications in Foxhall Road:

- C/90/1271- Previous planning application approved by Suffolk Coastal District Council in 1990 at 673 Foxhall Road for alterations and extensions to existing dwelling. This application although distinguishable from the present application being brought before committee due to location and design shares similarities with the current application being presented to the committee in that that extension is perceived not subordinate to the original property and highly viewable from the streetscene.
- C/08/0045- Previous planning application approved by Suffolk Coastal District Council in 2008 at 670 Foxhall Road for the erection of two-storey rear extension, alteration to roof and detached garage. Less like the current application presented to committee but illustrates a similar impact on the streetscene.

The email also makes reference to DC/16/4478/FUL at 702 Foxhall Road and this is already addressed within the committee report.