

**TOWN AND COUNTRY PLANNING  
(ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2017**

**SCOPING OPINION**

**Red House Farm, East of Westerfield Road, Ipswich**

**Proposed development of 1100 dwellings including secondary school (with sixth form), primary school (with early years), local centre, formal and informal open space and associated infrastructure.**

**Part of the Ipswich Garden Suburb Development**

**Ipswich Borough Council**

**Reference DM/2019/0230**

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Agreed by: Carlos Hone, Planning & Development Operations Manager

## **1. Introduction**

- 1.0 The Environmental Impact Assessment ('EIA') is an iterative process that attempts to ensure that any significant effects on a range of environmental issues that might result from a particular development are fully understood and taken into account prior to any planning decision being taken.
- 1.1 'Scoping' forms part of the overall EIA process, and attempts to identify all of the possible environmental impacts that a development project might cause, and then to subsequently determine which of those impacts are likely to be significant and which therefore require detailed investigation in the EIA.
- 1.2 This report forms the Ipswich Borough Council's ('IBC') Scoping Opinion for the intended submission of an Environmental Statement ('ES') in relation to the proposed mixed-use development comprising 1,100 dwellings, a secondary school (including sixth form), primary school, local centre and associated infrastructure. This development is on land known as Red House Farm, East of Westerfield Road, Ipswich and forms part of the Ipswich Garden Suburb Development ('IGS').
- 1.3 This Scoping Opinion is based on the Red House Farm EIA Scoping Report ('Scoping Report') provided to IBC by Phase 2 Planning. A scoping exercise was initiated following the receipt of the Scoping Report on 8<sup>th</sup> October 2019.
- 1.4 This Scoping Opinion shall not preclude IBC requiring the developer to submit further information in connection with any ES submitted in connection with an application for Planning Permission.

## **2. Consultation**

- 2.1 IBC undertook consultation with the relevant consultation bodies and relevant parties seen to have an interest in the proposal and/or having expertise in the environmental issues relevant to this site. Copies of the responses are appended to this Scoping Opinion (Appendix 1).

Responses were received from the following:

- The Environment Agency
- Historic England
- Natural England
- Network Rail
- Sports England
- Health and Safety Executive
- Suffolk County Council ('SCC')
- Place Services on behalf of IBC
- Ipswich Borough Council- Conservation and Urban Design
- Ipswich Borough Council- Public Protection and Environmental Health
- East Suffolk Council

- 2.2 IBC has not received responses from Highways England, Suffolk Wildlife Trust, DEFRA, the adjoining authorities Babergh and Mid Suffolk District Council, and the following IBC Teams, Community Development, Landscape/Parks, Economic Development and Legal. Should any responses be received after issuing this Scoping Opinion than these will be passed to Phase 2 Planning with commentary from IBC.
- 2.3 The Council have reviewed the responses from the consultees and taken into account the specific characteristics of the development.

### **3. Proposed structure for the ES**

- 2.4 The ES must contain the information specified in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). It must also include any additional information specified in Schedule 4 of the 2017 Regulations which is relevant to the specific characteristics of the development and to the environmental features likely to be significantly affected. Regard should be given the National Planning Practice Guidance on Preparing an Environmental Statement.
- 2.5 IBC make the following comments in regard to the development site and surroundings.

#### Location and setting

- 2.6 This section should describe the physical features of the site and its surroundings. Where applicable, the information considered under this section should include all relevant statutory designations. It should also include references to relevant national policies (including National Planning Practice Guidance) and local plans and policies (including adopted or emerging development plans). Reference should also be made to international designations.
- 2.7 Regarding Local Plan Policies, the Ipswich Local Plan is currently under review to provide a framework up until 2036. Consultation under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 is proposed in early 2020 (subject to Council approval) with the Final Plan being presented to the Secretary of State in 2020. Any ES and connected Planning Application will need to have regard to the emerging Local Plan.

#### Description of Development

- 2.8 This section should describe the purpose and physical characteristics of the development, including details of the proposed access and transport arrangements, the number of people to be employed both during the construction phase and as part of the development, and proposed number of residents. It should identify the land use requirements and other physical features of the development both during construction and when operational.

- 2.9 It is also recommended providing details of the anticipated programme/phasing for development. A chapter on construction methodology and phasing could be included in support of future years baseline date.
- 2.10 Regard should be given to Policy CS10 and Table 8B of the Core Strategy and Policies Development Plan Document Review (2017) ('Local Plan') which sets out the distribution of land uses for each Neighbourhood for IGS.

#### Consideration of Alternatives

- 2.11 This section should include details of how the design/layout was influenced by the need to minimise carbon emissions and impact of climate change.

#### Significance Criteria

- 2.12 This section should include a description of the forecasting methods to predict the likely effects on the environment.
- 2.13 Establishing the significance of any impact can be contentious as it may involve value judgements and expert interpretation. It is therefore prudent that significance is established using transparent methodologies based on defined standards, legislation, policy and expert opinion. The ES should therefore include reference to:
- The methodology utilised for example by reference to established standards such as ISO, BS or specific industry recognised guidelines.
  - Assumptions and underlying rationale.
  - Fact, interpretation of facts, opinions, judgements based on facts.
  - Confidence limits associated with the prediction.

#### Cumulative Assessment

- 2.14 All of the parts of the IGS as defined by the Local Plan Policy CS10 (or any such amended policy) should be included within the cumulative assessment. The cumulative assessment should also include other committed development within Ipswich as well as those in East Suffolk given the close proximity to the administrative boundary of East Suffolk. A rationale should be included on what committed developments have been included or excluded in relation to those in Ipswich and the East Suffolk. Please refer to the response from East Suffolk Council which identifies projects/developments within their boundary which should be taken in to consideration.
- 2.15 Regard should also be given to the status of the proposed housing allocation to the northern end of Humber Doucy Lane adjacent to Tuddenham Road. This is proposed through Draft Policy ISPA4 of the Core Strategy and Policies Development Plan Document Review Preferred Options. This is an emerging policy which may be adopted or near adoption when the ES and connected Planning Application is submitted. The draft policy looks to restrict the development to commence after 2031. The emerging Suffolk Coastal Local



Plan also includes this housing allocation under policy SCLP12.24 (refer to East Suffolk Councils response appended to this Scoping Opinion).

#### **4. Key Environmental Issues**

- 2.16 IBC agree that Issues identified within the Scoping Report should be assessed under the EIA. IBC provide the following comments on these matters.

##### Transport

- 2.17 It is agreed that Transport should be scoped into the ES. The commitment to build upon the previous work for the Henley Gate and Fonnereau Village developments (part of the IGS) is welcomed.
- 2.18 The Transport Assessment needs to accord with National Planning Policy Framework and National Planning Practice Guidance. It is also recommended that any road or street works, any traffic incidents or unusual event (such as extreme weather) that may have an influence on trip routing in that period is noted and assessed for their effects.
- 2.19 Regard should also be given to Policy CS10 and Table 8B of the Local Plan which details the Strategic and Neighbourhood Infrastructure requirements for IGS. This includes, delivery of a bus service, cycle and pedestrian crossings, improvements to cycleways, footpaths and Westerfield Station.
- 2.20 Consideration of the future use of the existing farm track which cuts through the site should be discussed within this Chapter.
- 2.21 It is agreed that a Travel Plan ('TP') should be prepared. The TP should be undertaken in accordance with The National Planning Policy Framework and National Planning Practice Guidance. The TP should include consideration of the following:
- Improving pedestrian footways
  - The provision of pedestrian crossings between footpaths or bus stops
  - The provision of separate cycle and pedestrian access to the site.
  - The provision of cycleways/enhancing local cycle networks off site.
  - The utilisation of Public Rights of Ways
- 2.22 Improvements to the network in this area are likely to be required to meet the needs of all future users. Improvements should be designed to improve connectivity between the development and the local services and employment and will need to reflect the nature and intensity of usage.
- 2.23 SCC raise the following points which IBC agree:
- agrees with the summary of the likely significant effects outlined in paragraph 4.1.12 of the Scoping Report, however considers there are areas requiring assessment not outlined in the methodology.
  - SCC hold injury accident records and traffic count and speed data. SCC

also uses a county wide model of traffic, which could be used to inform the Transport Assessment and resulting elements for the ES.

- SCC expect the agreed trip rates for the Henley Gate and Fonnereau Developments to form the basis for the trip generation for this site.
- The list set out in 4.1.15 of the Scoping Report is not agreed. The two additional junctions; on the A1214 east of the site, Rushmere Road roundabout and the Heath Road / Woodbridge Road gyratory (A1214 / A1189) need to be included in the assessment list. While the junctions listed are likely to be the most significantly impacted by development traffic, SCC also expect these two junctions require assessment as well. While the main distribution of trips is likely to be to the south, the town centre and other key local services, it is likely that significant traffic will head to the east of the site, to Ipswich NHS Hospital, Ransomes Europark / Futura Park and BT Adastral Park, all significant local employment sites.
- The collision data investigation area should also be extended to cover the expanded junction assessment scope detailed above.
- The assessment will also need to consider the impact on the rural routes to the north of the site, and some of the residential streets either side of the A1214 corridor. As the main strategic routes become more congested by traffic growth it is likely that traffic will partially migrate to less suitable routes. The rural roads to the north are in parts very narrow and not conducive to significant increases in traffic and a management strategy will be required to deal with impacts on these roads arising from the development.
- As part of the sustainable transport package for the site SCC would expect that considerable thought is given to an enhanced bus service for the whole IGS, building on the services proposed for the Henley Gate and Fonnereau Neighbourhoods. Particular attention should be given to potential measures to give buses priority over private vehicles on their journeys to and from the town centre. The extensive Public Rights of Way network in the vicinity of the site is also an opportunity to improve access to the countryside and for walking and cycling to key destinations of attractive traffic free routes. The off-site routes should be considered alongside the internal IGS walking and cycling routes to come up with a comprehensive access strategy which will contribute to significant modal shift away from the use of private motor vehicles.

2.24 Natural England also provide the following advice (in summary):

- The ES should consider potential impacts on access land, public open land, rights of way, coastal access routes and National Trails in the vicinity of the development. They also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way that should be maintained or enhanced.
- encourage any proposal to incorporate measures to help encourage people to access the countryside

*Refer to consultation responses from:*

- *Alghoul Dalia, Network Rail, email sent 28<sup>th</sup> October 2019*
- *Francesca Shapland, Natural England, Letter and Annex A dated 5<sup>th</sup> November 2019*
- *James Cutting, Suffolk County Council, letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019*

Air Quality

- 2.25 It is agreed that Air Quality should be scoped into the ES. This development alongside the rest of the Ipswich Garden Suburb is likely to add to the traffic and congestion in the areas already covered by the five declared Air Quality Management Areas (AQMAs) within Ipswich.
- 2.26 In regard to Monitoring Location 61, IBC offer the following information which was part of the consideration of the Henley Gate and Fonnereau developments.
- 2.27 The 2018 Air Quality Annual Status Report identifies Diffusion Tube No. 61 with a location of Henley Road/Valley Road. The reading for this diffusion tube raised concerns as it was at 41 NO<sup>2</sup> thus exceeding the national allowance and appeared to show a marked increase from the previous year. This was investigated in consultation with IBCs Environmental Protection Team.
- 2.28 Diffusion Tube 61 had been moved to its current location at Henley Road/Valley Road in August 2016. This was not evident or clearly identified within the ASR 2018. The diffusion tube 61 in its new location on the Henley Road / Valley Road junction is kerbside on a lamppost and the exposure to NO<sup>2</sup> steeply drops off when moving outwards towards sensitive receptors (residential properties). It is then common practice to bias correct the reading. The reading for tube 61 was bias corrected to 40.5 NO<sup>2</sup> but also should have been distance corrected given the setback from any sensitive receptors from the kerbside.
- 2.29 It is recommended the Air Quality Assessment has regard to the Supplementary Guidance- Air Quality Management and New Development 2011, Suffolk Authorities. This is available to view on IBC's website-
- [https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/Appendix\\_1\\_Proposed\\_Supplementary\\_Guidance\\_October\\_2011v5.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/Appendix_1_Proposed_Supplementary_Guidance_October_2011v5.pdf)
- 2.30 IBC's Environmental Health Team advise the methodology for the air quality modelling should be agreed with them prior to the assessment being conducted and details on the measures designed to mitigate air quality impacts should also be included.
- 2.31 IBC advises that the scenarios that should be considered on the impact should be expanded to include Future Year scenario (plus 10 years) based on the reference made at paragraph 4.2.17 of the Scoping Report.

- 2.32 IBC would recommend that the scope of the air quality assessment also include the impact of road traffic emissions from construction traffic and not just dust given it is proposed that the development will take 10 years to complete.

*Refer to consultation responses from:*

- *Andrew Coleman - Environmental Health Officer (IBC) email sent 24<sup>th</sup> October 2019.*

#### Noise and Vibration

- 2.33 It is agreed that the development, particularly during construction, is likely to have a significant effect on Noise and Vibration. As such, this topic should be scoped in. The table at 4.3.13 of the Scoping Report identifying the noise and vibration effects for inclusion in the assessment is also agreed.
- 2.34 Historic England advise that consideration of the potential environmental effects on the historic environment, such as noise and vibration, should be referenced under a separate heritage section. Further information regarding this is provided below within the section of Heritage.
- 2.35 IBC's Public Protection / Environmental Health Team advise that noise surveys detailing internal and external (and potential) sources of noise and details of design of properties, waste storage, mitigation materials and provision of sound insulation will be required in due course.

*Refer to consultation responses from:*

- *Ben Atkinson – Public Protection Officer (IBC) email sent 15 October 2019*
- *Alghoul Dalia, Network Rail, email sent 28 October 2019*
- *Clare Campbell, Historic England, letter dated 31 October 2019*

#### Landscape and Visual Assessment

- 2.36 It is agreed that the landscape and visual impact should be scoped into the ES. Regarding receptors with potential views towards the site, IBC recommend including potential views from the railway line and views from Tuddenham Road Bridge.
- 2.37 Consideration of the evolution of the boundaries and hedges within the park may also inform the Landscape and Visual Impact Assessments ('LVIA') and the Illustrative Masterplan.
- 2.38 IBC's Conservation and Urban Design Officer advises that Historic England's *Evaluating the impact of housing development on the historic environment*, 2014 may be of interest and use in preparing the LVIA.
- 2.39 The LVIA should have regard to the cumulative effects of the proposed development and rest of IGS, particularly the remaining part of the Red House Farm neighbourhood.

2.40 Natural England provide the following advice relating to what should be included within the LVIA:

- Details of the local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area.
- Include assessments of potential impacts of the development on local landscape character using landscape assessment methodologies- <https://www.gov.uk/guidance/landscape-and-seascape-character-assessments>
- Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.
- The Developer should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest.

*Refer to consultation responses from:*

- *Rebecca Styles, Conservation and Urban Design Officer, IBC memo dated 24<sup>th</sup> October 2019*
- *Clare Campbell, Historic England, letter dated 31<sup>st</sup> October 2019*
- *Francesca Shapland, Natural England, Letter and Annex A dated 5<sup>th</sup> November 2019*
- *Suffolk County Council Archaeological Services response received 18<sup>th</sup> October 2019*

#### Archaeology

2.41 It is agreed that Archaeology should be scoped into the ES. As described by SCC Archaeological Service ('SCCAS') the site is a large area that has not been subject to systematic archaeological investigation. There is potential for multiperiod archaeological remains on this site similar to those recorded on the Fonnereau development to the west of the site. As such, there is likely to be a significant impact on archaeological remains.

2.42 The site falls within Archaeological Character Zone 2c as identified in the Development and Archaeology Supplementary Planning Document for Ipswich ([https://www.ipswich.gov.uk/sites/default/files/spd\\_small.pdf](https://www.ipswich.gov.uk/sites/default/files/spd_small.pdf)) (see pages 72-3), and further information on evaluation methodologies and processes can be found in that document.

2.43 SCCAS advise the following which IBC support:

- Whilst the Desk-Based Assessment will provide baseline data, any Planning Application should also include the results of trial-trenched archaeological evaluation.
- In order to fulfil the requirements of the National Planning Policy Framework, a Field Assessment is also necessary, and the results should inform the EIA and illustrative Masterplan so that significance and impacts can be assessed and considered.
- Some areas (as yet unidentified) may require preservation in situ where appropriate. For surviving below ground archaeological heritage assets where (1) development impacts are proposed that will damage or destroy remains and (2) where mitigation through recording is considered acceptable, the EIA should include proposals for mitigation to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, and the definition of areas which require further investigation, will be determined based upon the results of the suite of evaluation and assessment work undertaken. Proposals for outreach and enhanced public understanding as part of this mitigation work should also be included as part of the EIA.

SCCAS have advised that they would be pleased to continue to engage on the archaeological work required.

*Refer to consultation responses from:*

- *Suffolk County Council Archaeological Service response received 18<sup>th</sup> October 2019*

#### Ecology and Biodiversity

2.44 It is agreed that Ecology and Biodiversity should be scoped into the ES. Both the Henley Gate and Fonnereau Developments of Ipswich Garden Suburb were considered likely to have a significant effect on a Natura 2000 site. IBC, as the Competent Authority, undertook a Habitat Regulation Assessment- Appropriate Assessment which identified potential for significant impacts of these development alone and in-combination. A package of mitigation measures was agreed with the Applicant's of these developments. This included the provision of the IGS Country Park and provision of publicly accessible greenspaces. As it cannot be concluded that no new residents will visit the Natura 2000 site, a proportionate financial contribution to fund off-site visitor management in-line with the emerging Suffolk Coast Recreational Avoidance and Mitigation Strategy ('RAMS') was also secured. This followed Natural England's interim advice and to avoid adverse effect from in-combination effects, in addition to the new Country Park. The RAMS is due to be adopted early 2020. Natural England advise that this proposal should be included within the RAMS strategy. Refer also to East Suffolk Council's response.

2.45 The development has the potential to increase levels of recreational disturbance to the Orwell Estuary. This development is within the 13km Zone

of Influence of the Stour and Orwell Estuaries SPA and RAMSAR site. The Orwell Estuary is designated as a Site of Special Scientific Interest.

- 2.46 Without mitigation this development is predicted to result in adverse effects on the integrity of Stour and Orwell Estuaries SPA and Ramsar site in combination with other plans and projects. IBC have been advised by Place Services, that a project level Habitat Regulation Assessment ('HRA') stage two Appropriate Assessment is likely.
- 2.47 It is essential that within any shadow HRA report an assessment of the likely recreational disturbance impact from the development is included. This should be based on current designated site information and visitor information. As well as this, full details of the measures proposed to address recreational impacts should be included within the report.
- 2.48 It would be helpful to IBC if the applicant provides a section on Information to support the HRA whereby the natural greenspace on site will connect with the Ipswich Garden Suburb Country Park and Public Rights of Way network to provide and promote a daily walk route of 2.7km to avoid impacts on the Habitats sites from the development alone.
- 2.49 In regard to the paragraphs relating to Habitats (4.6.2 to 4.6.4 of the Scoping Report), having reviewed [www.magic.gov.uk](http://www.magic.gov.uk), a Woodpasture and Parkland Biodiversity Action Plan Priority Habitat is indicated on the site. This area is to the west of Red House Farm and north of properties fronting Bromeswell Road. It is likely this area covers the mature trees noted in paragraph 4.6.4 of the Scoping Report as relics of Red House Park. It is recommended having regard to this in any appraisal of Habitats.
- 2.50 Natural England advise that Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.
- 2.51 Natural England advise that a habitat survey (equivalent to Phase 2) is carried out on the site in order to identify any important habitats.
- 2.52 Any ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The ES should include details of:
- Any historical data for the site affected by the proposal (e.g. from previous surveys);
  - Additional surveys carried out as part of this proposal;
  - The habitats and species present;
  - The status of these habitats and species (e.g. whether priority species or habitat);

- The direct and indirect effects of the development upon those habitats and species;
  - Full details of any mitigation or compensation that might be required.
- 2.53 Natural England also advise that the England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES in the chapter relating to Ecology and Biodiversity.
- 2.54 Place Services, on behalf of IBC, provide the following comments which IBC agree with:
- Specific comments regarding the surveys for protected species (refer to response appended to this Scoping Opinion).
  - The desktop assessment should be prepared based on a local data search supplied by the Suffolk Biodiversity Information Service (SBIS) and records should inform the survey requirements. Priority and Protected Species need to be adequately considered and all records from new or updated surveys undertaken should be shared with SBIS as a matter of best practice.
  - There is little reference to Priority Habitats.
  - The ES needs to consider the potential impacts on all the relevant protected and Priority Species and should avoid, mitigate and/or compensate for all impacts not just significant ones. This is necessary for IBC to demonstrate they have met the s40 of the NERC Act - Biodiversity Duty.
  - All Impacts on ecological features, not just significant ones, should be provided to IBC to enable it to demonstrate it is meeting it's s40 Biodiversity Duty.
  - Survey and Assessment should meet the requirements of both Natural England Standing advice and the Suffolk Biodiversity Validation Checklist.
  - Noted the site is dominated by arable fields but disagree that they have little ecological value given the presence of Skylark and Brown Hare, both Priority Species typical of farmland were recorded on site. Appropriate mitigation will need to be included within the ES.
  - Satisfied that the ecological assessment will follow nationally agreed guidelines including undertaking all survey work in the appropriate season by appropriately qualified ecological experts as required by EIA Regulations.
  - Para 4.6.34 of the Scoping Report states that the ES will set out any ecological enhancement proposed. To comply with NPPF, there is an opportunity to enhance the development in order to deliver measurable net



gain for biodiversity and this should include integral bird (e.g. swift) and bat boxes in all dwellings and if not already secured as mitigation, hedgehog-friendly fencing throughout the development. The Ecology chapter should cross reference with other chapters in the ES to thoroughly explore all reasonable options to enhance the development for Protected and Priority species.

*Refer to consultation responses from:*

- *Sue Hooton, Place Services (on behalf of IBC), letter dated 4<sup>th</sup> November 2019*
- *Francesca Shapland, Natural England, Letter and Annex A dated 5<sup>th</sup> November 2019*
- *Ben Woolnough, East Suffolk Council email sent 11<sup>th</sup> November 2019*

#### Flood Risk and Drainage

- 2.55 It is agreed that Flood Risk and Drainage should be scoped into the ES. The Environment Agency has raised concerns regarding the extent of the Scoping Report and the lack of information regarding potential water quality impacts or plans for foul drainage. The site is within a protected area for drinking water from surface sources. The ES will need to review the impact on water quality.
- 2.56 IBC agree with the Environment Agency, that the Scoping Report is expected to have outlined how the EIA will assess the potential for impacts on river quality and wastewater infrastructure. It is expected to see an entire section or chapter covering the impacts on the water environment, water efficiency and quality of water supply and foul drainage.
- 2.57 The EIA should consider foul drainage from the proposed development and the impact of additional waste water on existing infrastructure and the water environment. The Environment Agency has advised that more detail needs to be provided so they can comment on capacity and the suitability of the proposals.
- 2.58 It is recommended that consideration is given to the Environment Agency's recommendation of inclusion of "Key Environmental Issues" which considers foul drainage impacts on surface water quality.
- 2.59 Within the Environment Agency's response appended to this Scoping Opinion, they have provided suggestions to improve the Scoping Report from a water quality perspective. This includes reference to the Water Framework Directive, Habitats Directive, impacts on Water Recycling Centre and pressure on existing sewerage infrastructure, and Water Cycle Study.
- 2.60 The Environment Agency also raised concerns regarding the impact on water Resources. The Abstraction Licensing Strategies for East Suffolk, published by the Environment Agency, highlights over-abstraction of water resources within the area. According to the Anglian Water 2015 Resource Management Plan – a future water resource deficit for East Suffolk is predicted in Asset Management Period 8 (2029/30). Furthermore, the Anglian Water 2015

Resource Management Plan and the revised draft Water Resources Management Plan 2019 considers the East Suffolk resource zone and River Gipping as particularly vulnerable sources under climate change vulnerability assessments. The impact of increased demand and climate change –would affect abstraction from the nearest main river, the River Gipping, which is connected to this site via the network of drains within and around the Proposed Development Site.

- 2.61 It is recommended that the ES should include an assessment of the development's potential effects on the surrounding water environment. The assessment should include water quality, water supply, flood risk, foul and surface water drainage, and pollution prevention. Cumulative impacts with other developments should also be included with this assessment.
- 2.62 The ES should set out what the impacts from the development will be in each of the parameters of the Water Framework Directive and Groundwater Directive, and what mitigation will be put in place to avoid any impacts. Implications for the feasibility and timing of the development need to be considered as part of the ES. It is requested that the potential impacts of the utility supplies be recognised in the ES.
- 2.63 As such, it is recommended to either expand this Chapter to cover these matters or provide an additional Chapter.
- 2.64 SCC recommend that this chapter should be named "Flood Risk and Water Management" to reflect that water should be treated as a resource that should be valued, rather than just a problem to be mitigated. The chapter should consider the net gains to the environment and biodiversity that could be provided through the provision of sustainable drainage systems. IBC support this approach but advise that the title should also account for water quality if it is to be included in this Chapter.

SCC offer the following additional points which IBC support.

- As well as the impacts listed from paragraphs 4.7.7 – 4.7.10 of the Scoping Report, the positive impacts of environmental and biodiversity gain should be considered.
- The County Council has historical flood information, predicted flood information and a surface water management plan for Ipswich. The Environment Agency and their River Basin Management Plan should provide information on water quality.
- The assessment should inform the SuDS design and confirm requirements for water quality treatment SuDS as set out in planning practice guidance paragraph 69 (Reference ID: 7-069-20140306). Preparation of a drainage strategy should consider the policy and guidance in the Suffolk Flood Risk Management Strategy and specific guidance on SuDS design.

- The proposed site surface water drainage strategy resulting from the EIA should identify the size and locations of SuDS and address the contribution that water management can make to net gains.
- The 2018 climate change projections should also be used in assessing flood risk.

2.65 IBC recommends that the Local Lead Flood Authority (Suffolk County Council Floods) is included in any consultation process of the proposed Flood Risk Assessment.

*Refer to consultation responses from:*

- *Ed Abigail, Environment Agency, letter dated 31<sup>st</sup> October 2019*
- *James Cutting, Suffolk County Council letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019*

#### Socio-economics

2.66 It is agreed that Socio-economics should be scoped into the ES. Due to the scale and nature of the development the proposal is likely to have a significant impact on social infrastructure, local amenities and services. The additional population and demographic will place additional demands on local services, potentially leading to them being stretched beyond their intended capacity. Positive impacts should also be detailed such as job creations and provision of additional services.

2.67 In particular, reference to how the impacts of the needs of young people (education and play facilities) and older people (housing standards and accessibility in the wider built environment) can be mitigated should be made. Alternative options should be tested and set out in relation to the design and layout of the development.

Suffolk County Council have also advised the following:

- They would be pleased to supply baseline data in relation to County Council services. Existing capacity at school and early years facilities, and additional demand arising, will be particularly useful and will be supplied upon request. They can also share information relating to the number of children likely to live in the new development.
- Data on the number and likely housing needs related to older people at a district level is available from a tool provided by the Housing Learning and Improvement Network, known as Shop@ (see footnote 2 of SCC's letter appended to this Scoping Opinion). This will provide useful indicative information on the demographic makeup of the development. The State of Suffolk 2019 report and the Suffolk Observatory also contains information on the demographics of the County.

- Whilst there is no single methodology for considering impacts on older people, the Government's 'Lifetime Neighbourhoods' report offers a useful guide to the spatial needs of older people. For considering the impacts on Suffolk County Council services, including those for young people, please see the Section 106 Developers Guide to Infrastructure Contributions in Suffolk. The inter-relationship between transport and the provision of services is a particularly important consideration.

2.68 IBC also advise consideration of the neighbourhood infrastructure and community development identified and discussed in the Ipswich Garden Suburb Infrastructure Delivery Plan, Ipswich Garden Suburb Supplementary Planning Document and Policy CS10 and Table 8B of the Local Plan.

*Refer to responses:*

- *James Cutting, Suffolk County Council, letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019.*

## **5. Other Matter to be included in the EIA**

5.1 Section 5 of the Scoping Report scopes out matters relating to Land and Soils, Heritage and Public Health. IBC disagree and recommend that these are scoped into the ES.

### Land and Soil

5.2 The Scoping Report includes a copy of the Agricultural Land Classification (Appendix 3). This identifies that 89.7% of the area surveyed would be classed as 'best and most versatile land'. The report concludes that any development in the immediate locality will have a similar impact on the best and most versatile soils in the area. The presence of 3b soils (11.3% of the area) would mean a slightly reduced impact from a local aspect. Whilst the report identifies an impact it does not identify the level of impact in terms of significance.

5.3 Given the amount of best and most versatile land impacted by this development and cumulatively with the rest of IGS, and the irreplaceable loss of agricultural land, IBC consider that the development is likely to lead to a significant impact. This impact should be assessed within the ES.

5.4 It is also recommended that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF (July 2019). As described by Natural England, soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

5.5 The ES should identify the degree to which best and most versatile soils are going to be disturbed/harmed and the level of impact. Any mitigation measures

to help reduce this impact should be identified. Further guidance is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.

- 5.6 IBC also recommend having regard to SCC's recommendation regarding Minerals. The County Council as Minerals Planning Authority is interested in increasing the number of sites which provide some of their own minerals, through limited extraction on site as part of the normal construction process. This limits the need for minerals to be brought on site from elsewhere and reduces the need for minerals to be extracted at other locations and transported across the County. The site is large enough that appropriate provision could be made for assessing the mineral resource.

*Refer to consultation responses:*

- *Francesca Shapland, Natural England, Letter and Annex A dated 05 November 2019*
- *James Cutting, Suffolk County Council letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019*

#### Heritage

- 5.7 Both Historic England and IBC's Conservation and Urban Design Officer identify that this development has the potential to affect the significance of numerous heritage assets. The Scoping Report identifies the development will impact on the setting of surrounding heritage assets but details that this will be assessed through the LVIA. However, the Scoping Report does not indicate that the LVIA will include or be informed by a Heritage Statement prepared by a competent heritage professional. As identified by IBC's Conservation and Urban Design Officer, a Landscape and Visual Assessment alone will be insufficient in considering the impact of proposed development on heritage assets.
- 5.8 Consequently, the approach to Heritage set out in the Scoping Report is not considered an adequate approach to identify the impact on heritage significance. As recommended by Historic England, the Archaeology chapter could be expanded to include all heritage and historic environment issues. While the consideration of the setting of heritage assets will overlap with the LVIA, the heritage issues should be considered in their own right. There consideration of the potential environmental effects on the historic environment, such as noise and vibration, should also be referenced under the heritage chapter or section.
- 5.9 Attention is drawn to Historic England's *The Setting of Heritage Assets: Historic Environment Good Practice Advice* in Planning Note 3 (Second Edition) which discusses the relationship between setting and views. This states that 'consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views'.

- 5.10 The staged approach to taking decisions on setting given here can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate that significance. Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets.
- 5.11 The ES must therefore identify the significance of heritage assets, as well as the contribution made to significance by their setting, and then make an assessment whether the proposal would result in harm to the heritage assets. Where harm arises, measures should be taken in the design of the scheme to mitigate this harm through layout, density and design. Tree planting alone is unlikely to be sufficient mitigation to preserve the contribution that setting makes to a historic building's significance.
- 5.12 The structure of the ES with respect to heritage should:
- Identify all designated heritage assets
  - Assess the setting of designated heritage assets.
  - Assess the contribution made by the setting to the significance of the designated heritage asset.
  - Assess the potential impact on the setting (noting the cumulative impact with other developments)
  - Assess the potential impact on the significance of the asset.
  - Assess the scope for mitigating any negative impact.
  - The impacts should be considered individually for each asset.
- 5.13 The following points raised by IBC's Conservation and Urban Design Officer and Historic England should also be factored into the ES.
- With regard to the cemeteries, although there is existing development between the cemeteries and the proposed development site the assessment should consider if the proposed development would impact on the significance of this historic site both in terms of any visual impact and non-visual effects such as the environmental considerations. If there is potential for a visual impact, it would be helpful to illustrate this in photomontages.
  - Red House Farm is an undesignated asset included on IBC's Local List (Buildings of Townscape Interest) SPD. Red House Farm formed part of the Red House Park estate and this group of Victorian farm buildings are all that remain of the built heritage of the Red House Park Estate. The assessment should include the impact on the cluster of farm buildings and the historic landscape associated with the former parkland.
  - Attention is also drawn to the Pill box located in the rear garden of 253 Tuddenham Road which is included on the Local List (Buildings of Townscape Interest) SPD. The railway line would have provided an unintentional anti-tank obstacle, and pillboxes were often positioned close

to railway crossings for this reason, as tanks would need to avoid the ditches and banks at railway lines. The pillbox was therefore orientated to cover the bridge over the Felixstowe line which runs underneath Tuddenham Road, with the houses to the north being built after the end of the war which now obstruct the view from the pillbox to the railway line. This is not identified in the Scoping Report.

- Impacts on the setting of the historic settlement of Westerfield should also be considered. This should include considering the impact on the collective setting of the buildings in the village, as well as specific considerations on the impact of listed buildings and undesignated heritage assets within the village. The Grade I Church of Mary Magdalene is identified in the EIA; however, the assessment should also consider the impacts on the setting of Grade II Mill Farmhouse, Grade II rectory and other assets in Westerfield which have historically benefitted from an isolated setting.
- The EIA has identified the Grade II listed Cranfield Court on Valley Road and the Cemetery Conservation Area which is a Grade II\* Registered Park and Garden. It is recommended that the assessment is extended to include Westerfield House on Humber Doucy Lane, Lacy's Farmhouse and Allens House, all Grade II listed isolated buildings to the southeast of the red line site. Consideration should be given to the landscape impact and the setting of these heritage assets.
- Attention is also drawn to the recently adopted Ipswich Urban Characterisation Study SPD for the North East, published in June 2019, which bounds the red line site. The study identifies several character areas, including the rural edge, considering its character and appearance, as well as make recommendations for its management and future development.
- Also of interest in preparing the Heritage Statement and identifying mitigation would be Historic England's *Evaluating the impact of housing development on the historic environment*, 2014.

*Refer to consultation responses:*

- Clare Campbell, Historic England, letter dated 31<sup>st</sup> October 2019
- Rebecca Styles, IBC- Conservation and Urban Design Officer, memo dated 24<sup>th</sup> October 2019

#### Human Health

- 5.14 SCC advise the following which IBC support.
- 5.15 While a Health Impact Assessment is not necessary as part of an EIA, a human health section would help to synthesise the different elements of the ES. As is stated in paragraph 5.1.17 of the Scoping Report, a number of assessments already undertaken for the purposes of human health are being included in their own dedicated sections, such as noise and air quality. The ES could then link

these to the wider determinants of health, not just affecting the future residents of the development, but also existing neighbouring communities.

5.16 This could include (but not be limited to):

- how transport assessments lead to a strategy to encourage greater active travel, improving physical fitness and cardiovascular health for residents of the development and the surrounding areas;
- how assessing the impact of emissions will connect to the protection of respiratory health;
- the health benefits from the provision of new homes alongside associated community infrastructure;
- how assessment of noise and vibration will lead to mitigation and avoid health impact; and
- how rights of way can enable access to the countryside benefiting physical and mental health.

5.17 The application submitted by Crest for Henley Gate (reference IP/16/00608/OUT) included an assessment of health impacts which could be used as a template for this application.

5.18 The State of Suffolk report contains information on the health and wellbeing of the residents of Suffolk which could be used to highlight potential issues new residents may be exposed to.

5.19 Place Based Needs Assessment for specific geography including Ipswich has been produced recently which focused on wider determinants of health in the localities including Ipswich which can be found here:-  
[https://www.healthysuffolk.org.uk/uploads/IPSWICH\\_PBNA\\_Report\\_1-0.pdf](https://www.healthysuffolk.org.uk/uploads/IPSWICH_PBNA_Report_1-0.pdf)

*Refer to consultation responses:*

- *James Cutting, Suffolk County Council letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019*

## **6. Non-Significant Issues**

6.1 The justification for those environmental topics which are scoped out of the EIA, should be included in the final Environmental Statement. We would suggest that the Environmental Statement includes a chapter covering 'Non-significant issues' or similar, which details these justifications along with details of where these may be assessed elsewhere as part of any connected planning application.

6.2 It is agreed that the following Ground Contamination (land contamination), Climate Change, Light and Radiation, waste and Accidents and Disasters can be scoped out.

### Ground Contamination



- 6.3 This section appears to relate to contaminated land. As detailed in the Flood and Drainage section above, consideration of the impact of development on groundwater conditions, water resources and water quality should be included within the ES. The geo-environmental desk study does review risks for pollution of ground water, but only from the context of contaminated land.
- 6.4 Nevertheless, the impact from the existing land contamination is not considered likely to cause significant effects and it is agreed that a Phase 2 Investigation and securing any remediation work can be dealt with within the connected planning application.

*Refer to consultation responses from:*

- *Ben Atkinson, Public Protection Officer (IBC) email sent 15 October 2019*

#### Climate Change

- 6.5 The approach towards Climate Change is agreed. The proposed development should account for Climate Change Adaptation as part of the design. This includes the layout and incorporation of measures such as SuDs. Other aspects of adaptation could also be incorporated including excess heat and water stress and ecology (refer to Natural England's response).
- 6.6 Due to the issues regarding water supply, water resources should be recognised as a potential environmental sensitivity for this Proposed Development and considered under the climate change section for future environmental conditions and adaption. Due to the water pressures in the region, we consider it is particularly important that water efficiency measures are incorporated into this scheme, such as dual flush toilets, water butts, water saving taps and showers, greywater recycling and rainwater harvesting.
- 6.7 The development will need to have consideration of policies relating to Climate Change such as CS1, CS5, DM1, DM2 and DM4 of the Local Plan and Ipswich Garden Suburb Supplementary Planning Document.
- 6.8 In regard to changes to Future Environmental Conditions the 2009 UK Climate Projections have now been superseded by those published in 2018. The 2018 projections also provide further degree of detail.
- 6.9 It is agreed an account should be made of how the need to minimise carbons emissions influenced the choice of options and measures to be included within the development to reduce Carbon Emissions. It is recommended providing a standalone Energy Strategy.

*Refer to consultation responses*

- *Ed Abigail, Environment Agency, letter dated 31<sup>st</sup> October 2019*
- *James Cutting, Suffolk County Council, letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019*

- *Francesca Shapland, Natural England, Letter and Annex A dated 5<sup>th</sup> November 2019*

#### Light, Radiation and Heat

- 6.10 It is agreed that given the nature of the development this is unlikely to give rise to any significant radiation, light and heat effects.

#### Waste

- 6.11 Waste will be generated during the construction and occupation phases of the development, but it is assumed no additional waste material will be imported on to the site. A Waste Strategy Report will need to be prepared and submitted as part of the connected planning application and demonstrate how guidance will be met and waste management hierarchy delivered on-site.

*Refer to consultation responses from:*

- *Ed Abigail, Environment Agency, letter dated 31<sup>st</sup> October 2019*
- *James Cutting, Suffolk County Council, letter dated 5<sup>th</sup> November 2019 and email sent 5<sup>th</sup> November 2019*
- *Francesca Shapland, Natural England, Letter and Annex A dated 5<sup>th</sup> November 2019*

#### Accidents and Disasters

- 6.12 The proposed development site does not currently lie within the consultation distance of a major hazard site or major accident hazard pipeline; therefore, at present the Health and Safety Executive does not need to be consulted on any developments on this site.

*Refer to consultation responses from:*

- *Sue Howe, Health and Safety Executive, email sent 4<sup>th</sup> November 2019*
- *HSE's Land use planning information and advice from the Land Use Planning Web App and pre-application advice service (<https://pa.hsl.gov.uk/>)*

## **7. Summary**

- 7.1 For clarity, as set out above, IBC advise that the following disciplines are scoped into the EIA and assessed within the ES:

- Transport
- Air Quality
- Noise and Vibration
- Landscape and Visual Impact
- Heritage (including Archaeology)
- Ecology and Biodiversity
- Flood Risk and Water Management including Water Quality and Water Resources

- Socio-Economics
- Land and Soil
- Public Health

## Appendix 1

### Consultation Responses

Sports England

IBC-Public Protection

SCC- Archaeological Service

IBC- Environmental Health

IBC Conservation and Urban Design Officer

Historic England

Environment Agency

Network Rail

Health and Safety Executive

Health and Safety Executive- *Land Use Planning Web App and pre-application advice service*

Places Services

Suffolk County Council

Natural England

East Suffolk Council

## Rebecca Sands

---

**From:** Development Management  
**Sent:** 11 October 2019 11:08  
**To:** Lisa Evans; Rebecca Sands  
**Subject:** FW: DM/2019/0230 RED HOUSE FARM, TUDDENHAM ROAD, IPSWICH, IP4 3QL

**From:** Planning Central <[Planning.Central@sportengland.org](mailto:Planning.Central@sportengland.org)>  
**Sent:** 11 October 2019 08:49  
**To:** Development Management <[Development.Management@ipswich.gov.uk](mailto:Development.Management@ipswich.gov.uk)>  
**Subject:** DM/2019/0230 RED HOUSE FARM, TUDDENHAM ROAD, IPSWICH, IP4 3QL

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/>

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team

T: 020 7273 1777  
E: [Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)





Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gail Laughlan](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Louise Hartley, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)

## Rebecca Sands

---

**From:** Ben Atkinson  
**Sent:** 15 October 2019 08:23  
**To:** Development Management  
**Cc:** Andrew Coleman  
**Subject:** RE: Red House Farm, Ipswich - Request for Scoping Opinion ref - DM/2019/0230

Hi,

My comments for this would be that in the future we will need:

- Contaminated Land
  - Survey indicated that Phase II will need to be completed
- Properties
  - Will eventually need noise surveys detailing internal & external (and potential) sources of noise
  - Will need further details on design of properties, waste storage, mitigation materials and how they will provide sound insulation
- Construction
  - Will need construction management plan detailing control of noise/vibration, dust suppression etc.

I have passed to Andy Coleman for comments on AQ.

Thanks

Ben Atkinson  
Public Protection Officer  
Public Protection/Environmental Health

01473 433 120  
[ben.atkinson@ipswich.gov.uk](mailto:ben.atkinson@ipswich.gov.uk)

Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE

Please note I leave the office between 13.00-14.00hrs, any emails sent after this time may not receive a reply until the following day.

**From:** Development Management  
**Sent:** 10 October 2019 15:36  
**To:** Environmental Health  
**Subject:** Red House Farm, Ipswich - Request for Scoping Opinion ref - DM/2019/0230  
**Importance:** High

Hi

Please see attached.

Thanks.

Gavin Jones  
Planning & Development

**DC/209/0230 (IBC) and DC/19/3987/CON (East Suffolk) – Red House Farm, Tuddenham Road, Ipswich. EIA scoping and Archaeology**

The EIA proposal includes consideration of the effects of development on archaeological remains, and Suffolk County Council Archaeological Service (SCCAS) has welcomed the opportunity to be involved in pre-application discussions and to review a draft Desk-Based Assessment for the site. The applicant has indicated a commitment to field evaluation to be undertaken later on in 2019, which SCCAS welcomes as a best-practice approach. However, this intention is not captured in the proposed EIA methodology. Field evaluation would be an appropriate requirement prior to the determination of a planning application to inform decisions, and it is SCCAS advice that the results of this should be included in the Environmental Impact Assessment.

**Potential Impacts**

The site is a large area that has not previously been subject to systematic archaeological investigation and there is potential for as yet unidentified archaeological remains to be present within the development area. A summary presented in the EIA scoping document draws on a Desk-based Assessment prepared by Colchester Archaeological Trust.

The site lies within the former Red House estate, and within a broader landscape of multi-period archaeological remains along a small tributary valley of the River Gipping. As noted in the Scoping Report, the Historic Environment Record includes cropmarks in the south western part of the site, which may relate to the Red House parkland (the house was built in the early 17<sup>th</sup> century). To the west, a findspot of a Roman brooch is recorded, with medieval objects to the southwest. There is high potential for the continuation of similar multi-period archaeological remains as were recorded in evaluation of the 'Fonnereau' land to the west (Prehistoric, Roman, Medieval) but as yet the site has not been subject to systematic intrusive archaeological evaluation to characterise any remains. The HER also records that one of the fields within the development area is called Gravel Pit Field on the tithe map, so evaluation may establish that some localised areas of the site could be considered archaeologically sterile.

**Assessment Methodology**

EIA based on Desk-Based Assessment (DBA) is proposed, but in order to fulfil the requirement of the NPPF (paragraphs 189-190), field assessment is necessary to support any planning application. The information in the DBA will provide baseline data, but the application should also be supported by the results of trial-trenched archaeological evaluation, and, if and where appropriate, geophysical survey, targeted metal detecting or fieldwalking.

The results of these surveys should inform the Environmental Impact Assessment and Illustrative Masterplan, so that significance and impacts can be assessed and considered.

Some areas (as yet unidentified) may require preservation in situ where appropriate. For surviving below ground archaeological heritage assets where (1) development impacts are proposed that will damage or destroy remains and (2) where mitigation through recording is considered acceptable, the EIA should include proposals for mitigation to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, and the definition of areas which require further investigation, will be determined based upon the results of the suite of evaluation and assessment work undertaken. Proposals for outreach and enhanced public understanding as part of this mitigation work should also be included as part of the EIA.



Consideration of the evolution of the boundaries and hedges within the park may also inform Landscape and Visual Impact Assessments and the Illustrative Masterplan.

**Note**

SCCAS will be pleased to continue to engage on the archaeological work required. Please see our website for further information [http://www.suffolk.gov.uk/libraries-and\\_culture/culture-and-heritage/archaeology/](http://www.suffolk.gov.uk/libraries-and_culture/culture-and-heritage/archaeology/)).

The site falls within Archaeological Character Zone 2c as identified in the [Development and Archaeology Supplementary Planning Document](#) for Ipswich (see pages 72-3), and further information on evaluation methodologies and processes can be found in that document.

**From:** Andrew Coleman  
**Sent:** 24 October 2019 13:56  
**To:** Development Management  
**Cc:** Ben Atkinson  
**Subject:** RE: Red House Farm, Ipswich - Request for Scoping Opinion ref - DM/2019/0230

Hi,

I have examined the scoping report for the above. As highlighted in the report, an Air Quality Assessment should be provided with the application. As highlighted in paragraph, 4.2.18, the methodology for the air quality modelling should be agreed with this department prior to the assessment being conducted.

Details on the measures designed to mitigate air quality impacts should also be provided.

Thanks

***Andrew Coleman - Environmental Health Officer***

Environmental Protection | Environmental Health |  
Ipswich Borough Council | 3W Grafton House |  
15 - 17 Russell Road | Ipswich | Suffolk | IP1 2DE |  
Tel: 01473 433060

Fax: 01473 433027

E-mail: [andrew.coleman@ipswich.gov.uk](mailto:andrew.coleman@ipswich.gov.uk)

 Please consider the environment before printing this email

Grafton House, 15-17 Russell Road Ipswich IP1 2DE  
Tel: 01473 432913  
Fax: 01473 432974  
E-mail: development.management@ipswich.gov.uk



# Memo

To: Lisa Evans on behalf of the Head Of Development  
From: Conservation and Urban Design  
Ref: DM/2019/0230  
Date: 24<sup>th</sup> October 2019

---

**APPLICATION REF. NO.:** DM/2019/0230

**APPLICATION TYPE:** EIA Scoping Opinion request

**PROPOSAL:** Red House Farm development within the Ipswich Garden Suburb site.

**ADDRESS:** Red House Farm, Tuddenham Road, Ipswich, Suffolk

This application seeks comments on the Environmental Impact Assessment (EIA) for the proposed residential development around Red House Farm, forming a phase of the proposed Ipswich Garden Suburb to the north of the borough.

Proposed development of this site has the potential to affect the significance of numerous heritage assets. The most direct impact will likely be on the setting of Red House Farm, an undesignated asset included on IBC's Local List (Buildings of Townscape Interest) SPD. Red House Farm formed part of the Red House Park estate. The 18th century mansion, known as Red House Park, was the substantial home of the Edgar family. The mansion fell into disrepair as the Edgar family's wealth and influence diminished in to the 20th century, and was demolished in the 1937 and now occupied by denser residential development on Cranfield Court, off Valley Road. This group of Victorian farm buildings are all that remain of the built heritage of the Red House Park Estate. Assessment should include the impact on the cluster of farm buildings and the historic landscape associated with the former parkland.

Also included on the Local List (Buildings of Townscape Interest) SPD is the Type 28a anti-tank gun emplacement, more commonly known as a 'pillbox', dating from the Second World War, located in the rear garden of 253 Tuddenham Road, which bounds the application site to the southeast. The railway line would have provided an unintentional anti-tank obstacle, and pillboxes were often positioned close to railway crossings for this reason, as tanks would need to avoid the ditches and banks at railway lines. The pillbox was therefore orientated to cover the bridge over the Felixstowe line which runs underneath Tuddenham Road, with the houses to the north being built after the end of the war which now obstruct the view from the pillbox to the railway line. This is not identified in the EIA but should be considered in the LVIA and heritage statement.

Impacts on the setting of the historic settlement of Westerfield should also be considered. This should include considering the impact on the collective setting of the buildings in the village, as well as specific considerations on the impact of listed buildings and undesignated heritage assets within the village. The Grade I Church of Mary Magdalene is identified in the EIA, however the assessment should also consider the impacts on the setting of Grade II Mill Farmhouse, Grade II rectory and other assets in Westerfield which have historically benefitted from an isolated setting.

The EIA has identified the Grade II listed Cranfield Court on Valley Road and the Cemetery Conservation Area which is a Grade II\* Registered Park and Garden. It is recommended that the assessment is extended to include Westerfield House on Humber Doucy Lane, Lacy's Farmhouse and Allens House, all Grade II listed isolated buildings to the southeast of the red line site. Consideration should be given to the landscape impact and the setting of these heritage assets.

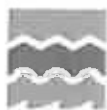
In its discussion of the assessment of impacts on heritage, the EIA states that a Landscape and Visual Impact Assessment and Environmental Statement. However, the EIA does not also indicate that these will be accompanied by a heritage statement prepared by a competent heritage professional. A LVIA alone will be insufficient in considering the impact of proposed development on heritage assets. Attention is drawn to Historic England's *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)* which discusses the relationship between setting and views - *Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views. The staged approach to taking decisions on setting given here can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate that significance. Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets.*

The heritage statement must therefore first identify the significance of heritage assets, as well as the contribution made to significance by their setting, and then make an assessment via the LVIA whether the proposal would result in harm to the heritage assets. Where harm arises, measures should be taken in the design of the scheme to mitigate this harm through layout, density and design. Tree planting alone is unlikely to be sufficient mitigation to preserve the contribution that setting makes to a historic building's significance.

Attention is also drawn to the recently adopted Ipswich Urban Characterisation Study SPD for the North East, published in June 2019, which bounds the red line site. The study identifies several character areas, including the rural edge, considering its character and appearance, as well as makes recommendations for its management and future development.

Also of interest in preparing the LVIA and heritage statement and identifying mitigation would be Historic England's *Evaluating the impact of housing development on the historic environment*, 2014.

Rebecca Styles  
Conservation and Urban Design Officer  
24<sup>th</sup> October 2019



Historic England

Ms Lisa Evans  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE

Direct Dial: 01223 582738

Our ref: PL00630308

31 October 2019

Dear Ms Evans

Thank you for seeking advice from Historic England on the scoping report for a proposal for the Red House Farm development which forms part of the Ipswich Garden Suburb site. The site is currently agricultural land between the northern edge of Ipswich and the railway line.

There are a number of grade II listed heritage assets in the surrounding area and the New and Old Cemeteries to the south. This landscape dates from 1855 and is a good example of a High Victorian Burial Board cemetery which was then extended in the early twentieth century. It contains an early provincial crematorium and associated commemorative landscape. It is designated grade II\*.

The Scoping Report proposes to consider archaeology but does not consider heritage to be significant, although it states that setting would be considered under the landscape and visual assessment. As archaeology is heritage we would advise this topic is expanded to include all heritage and historic environment issues. While the consideration of the setting of heritage assets will overlap with the landscape and visual assessment, the heritage issues should be considered in their own right. There consideration of the potential environmental effects on the historic environment, such as noise and vibration, should also be referenced under heritage.

With regard to the cemeteries, although there is existing development between the cemeteries and the proposed development site the assessment should consider if the proposed development would impact on the significance of this historic site both in terms of any visual impact and non visual effects such as the environmental considerations described above. If there is potential for a visual impact, it would be helpful to illustrate this in photomontages.

The setting of heritage assets is defined as the surroundings in which they are experienced in the National Planning Policy Framework. Further information about the setting of heritage assets and the assessment of the impact of development upon this can be found in the Planning Practice Guide and the Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.*



Historic England

Please do contact me if we can be of further assistance.

Yours sincerely,

Clare Campbell  
Team Leader - Development Advice  
[clare.campbell@HistoricEngland.org.uk](mailto:clare.campbell@HistoricEngland.org.uk)



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**Environment  
Agency**

Ms Lakisha McQuany  
Ipswich Borough Council  
Grafton House 15-17 Russell Road  
IPSWICH  
IP1 2DE

**Our ref:** AE/2019/124569/01-L01  
**Your ref:** DM/2019/0230  
**Date:** 31 October 2019

Dear Ms McQuany

## **RED HOUSE FARM, EIA SCOPING REPORT**

### **RED HOUSE FARM (UNIT 2) TUDDENHAM ROAD, IPSWICH, IP4 3QL.**

Thank you for your recent consultation dated 10 October 2019 and opportunity to comment on the EIA Scoping Report for Red House Farm. We have inspected the report, as submitted, and have some concerns regarding the extent of the current scope of the report, and have the following comments and recommendations to make.

#### **Water Quality**

The Scoping Report contains little to no information on potential water quality impacts or plans for foul drainage from the proposed development – we consider this to be very concerning considering the large size and potential environmental implications from this development.

In the Scoping Report we would expect to see an outline of how the EIA will assess the potential for impacts on river water quality and wastewater infrastructure from this development.

Usually in a scoping report of this nature we would expect to see an entire section or chapter covering impacts on the water environment or water efficiency and quality or water supply and foul drainage. This seems to have been over looked.

The scoping report should ensure that the EIA considers foul drainage from the proposed development and the impact of additional waste water on existing infrastructure and the water environment. We can see no reference to plans for foul drainage for this site. More detail needs to be provided so we can comment on capacity and suitability of the proposals.

We suggest adding in a chapter into Section 4 "Key Environmental Issues" of the report which considers foul drainage impacts on surface water quality.

A few more suggestions to improve the scoping report from a water quality perspective below:

Environment Agency  
Icen House Cobham Road, Ipswich, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

### Water Framework Directive (WFD)

WFD is briefly mentioned in the "Enviro Insight paper by Groundsur" at the appendix of the report, however, this legislation needs to be referenced in the main report.

WFD is an imperative piece of European legislation for protecting the water environment and should be referenced in any EIA or scoping report. We would expect to see the relevant objectives of WFD (no deterioration in water body status and achieving Good Ecological status) outlined. Developers and Local Authorities must have regard to the requirements of WFD when making their plans.

It is good practise for scoping reports to provide WFD background information for the area of interest. In this case it would be baseline information from the Anglian River Basin Management Plan, including baseline status information for relevant WFD surface waterbodies within the development area.

### Habitats Directive

In addition to WFD, the scoping report should reference the Habitats Directive and any protected areas which the development may have the potential to impact. It would be useful to see a table highlighting all relevant environmental legislation and a brief overview of each in the scoping report.

### Foul Water

From a water quality perspective, it is important to recognise that the greatest impact of the proposed development is likely to be manifest on the watercourse immediately downstream – in this case the River Gipping & Belstead Brook (depending upon which Water Recycling Centre (WRC) the foul flows are sent too - not stipulated at this stage) as a result of an increase in discharge rate from the sewage works. These impacts should be acknowledged in the Scoping Report and assessed through the EIA. The EIA should confirm that an increased discharge from the WRC will not compromise compliance with these environmental legislations

Consideration of plan for foul flows from the development:

The scoping report needs to reference the pressure that >1000 dwellings will have on existing sewerage infrastructure and outline a plan for where these flows will be treated. Early consultation with Anglian Water as the Sewerage Undertaker concerning treatment technologies, improved WRC capacity and sewer network capacity within the development area is recommended.

Assuming the plan is for the development to be connected into the existing foul sewer network and treated at Chantry WRC or Cliff Quay WRC – we currently do not have any capacity concerns. However, it is imperative that this is outlined in the pre-development plans. For a development of this size we would expect to see an Outline Foul Drainage strategy to be produced to support the development proposal. The Scoping report should highlight any potential direct and cumulative impacts from foul flows from this site.

### Water Cycle Study

The Scoping Report should also reference any relevant Water Cycle Study – we note



that the Suffolk Coastal District and Ipswich Borough Council Cross Boundary Water Cycle Study (WCS) was updated in Jan 2019 – and advise if this development has been included in any capacity assessments. Hopefully outputs of this WCS can be used to inform the EIA.

The WCS will identify any potential water services infrastructure and water quality issues associated with planned growth in the wider District, and will recommend measures to address them. The findings and recommendations of the WCS should ultimately be incorporated into this development proposal. If this site has not been assessed via a WCS, then an independent assessment will need to be made to assess the impacts of this development, in combination with other developments within the wider area, on existing sewerage infrastructure and the water environment.

### **Water Resource**

We would like to suggest the addition of an impact assessment for 'Water resources' within Chapter 4 of the EIA Scoping Report.

The report does not consider the impact the proposed development will have upon water resources within the area. Inevitably, the Proposed Development will increase demand through consumption of water but there is no reference to resource management plans or resource availability. The Abstraction Licensing Strategies for East Suffolk, published by us, highlights over-abstraction of water resources within the area. According to the Anglian Water 2015 Resource Management Plan – a future water resource deficit for East Suffolk is predicted in AMP8 (2029/30).

Furthermore, the Anglian Water 2015 Resource Management Plan and the revised draft Water Resources Management Plan 2019 – considers the East Suffolk resource zone and River Gipping as particularly vulnerable sources under climate change vulnerability assessments. The impact of increased demand and climate change –would affect abstraction from the nearest main river, the River Gipping, which is connected to this site via the network of drains within and around the Proposed Development Site. Therefore, we believe water resources should be recognised as a potential environmental sensitivity for this Proposed Development and considered under the climate change section for future environmental conditions and adaption.

Due to water pressures in the region we consider it is particularly important that water efficiency measures are incorporated into this scheme. Increased water efficiency will directly reduce consumer water and energy bills and reduce carbon dioxide emissions.

The applicant should consider the use of water efficient systems and fittings such as dual-flush toilets; water butts; water-saving taps and showers; and appliances with the highest water efficiency rating as a minimum. Greywater recycling and rainwater harvesting should also be considered. We welcome the use of SuDS on the site however the ultimate destination of surface water drainage and its possible effects on the Water Framework Directive status of receiving waters should be considered.

Any submitted scheme should include detailed information (capacities, consumption rates, etc) on proposed water saving measures. Applicants are advised to refer to the following for further guidance: <http://www.water-efficient-buildings.org.uk/>; and <http://www.savewater.savemoney.co.uk/>.

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social

responsibility messages and the use of technology to help sell their homes. For the homeowner, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixture and fittings should be considered as part of new developments.

#### **Residential developments**

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations (Amendment) 2015.

However, we recommend that in areas of serious water stress as identified by us, a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.

#### **Commercial/Industrial developments**

We recommend that all new non-residential developments of 1000 square metres gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

#### **Waste**

In relation to paragraph 5.1.2.0:

The applicant is strongly advised to prepare a site waste strategy which takes account of the requirements of the Waste Framework Directive 2008/98/EC transposed into UK law as the Waste (England and Wales) Regulations 2011.

Compliance with Article 4, the Waste Hierarchy, is a legal obligation. Any site waste strategy and management plan should include aspirations for zero waste to landfill, the need for waste prevention, re-use of materials on site, and recycling targets.

The strategy should show that all possible measures will be taken to reduce construction and demolition waste produced during the course of the construction, and how this will be achieved, such as preventing the over-ordering of materials, reducing damage to materials before use by careful handling and segregating waste on site into separate skips. The strategy should be made available to all staff and contractors so they are aware of what is required.

Waste should be designed out during the property design phase to ensure that during the construction and during demolition at the end of life, minimal volumes of waste result. The developer should consider how they will incorporate recycled/recovered materials into the building programme, including the use of secondary and recycled aggregates, and re-use of any on-site demolition waste. Plastic waste should be avoided. Any plastic based materials used in construction should be made from recyclable polymers wherever and whenever possible e.g. HDPE, LDPE, PET.

The applicant should consider how the design of the development will incorporate facilities to allow for easy recycling by the residents. Careful thought should be given as to how recycling will be made easy for residents of multi-occupancy buildings and for the provision for recycling on the move. Facilities like these will increase recycling as well as reduce litter.

The web site below is good source of information and advice regarding construction and demolition waste best practice. <http://www.wrap.org.uk>;

We trust that this advice is useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Abigall', with a long horizontal line extending to the right.

**Mr Ed Abigall**  
**Planning Advisor**

Direct dial 0203 0254209

Direct e-mail [Planning.lpswich@environment-agency.gov.uk](mailto:Planning.lpswich@environment-agency.gov.uk)

## Kisha McQuany

---

**From:** Alghoul Dalla <Dalia.Alghoul@networkrail.co.uk>  
**Sent:** 28 October 2019 10:55  
**To:** Kisha McQuany  
**Subject:** Network Rail Consultation DM/2019/0230 Red House Farm, Tuddenham Road, Ipswich, Suffolk  
**Attachments:** image002.emz

Dear Sir/Madam,

Thank you for consulting Network Rail with regard to the above planning application.

After reviewing the information provided in relation to the above planning application, Network Rail has no further observations or comments to make.

Kind regards,

**Dalla Alghoul**  
Town Planning Technician | Property  
Network Rail  
1 Eversholt Street | London | NW1 2DN  
M 07732641896  
E [dalla.alghoul@networkrail.co.uk](mailto:dalla.alghoul@networkrail.co.uk)  
[www.networkrail.co.uk](http://www.networkrail.co.uk)



**From:** Kisha McQuany <Lakisha.McQuany@ipswich.gov.uk>  
**Sent:** 15 October 2019 10:31  
**To:** Town Planning SE <TownPlanningSE@networkrail.co.uk>  
**Subject:** Planning Consultation

Good morning, I've just been notified that the files haven't been downloaded, is there another way I can get these to you, I tried to email but it bounced back.

**Ms Lakisha McQuany**  
Business Support Officer

T: +44 (0)1473 432904  
E: [lakisha.mcquany@ipswich.gov.uk](mailto:lakisha.mcquany@ipswich.gov.uk)  
Grafton House, 15-17 Russell Road, Ipswich, IP1 2DE  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)  
[www.facebook.com/IpswichGov](https://www.facebook.com/IpswichGov)  
[twitter.com/IpswichGov](https://twitter.com/IpswichGov)

**From:** WeTransfer <[noreply@wetransfer.com](mailto:noreply@wetransfer.com)>  
**Sent:** 15 October 2019 04:01  
**To:** Kisha McQuany <[Lakisha.McQuany@ipswich.gov.uk](mailto:Lakisha.McQuany@ipswich.gov.uk)>  
**Subject:** Your files have not been downloaded yet...



**Kisha McQuany**

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**From:** Sue.Howe@hsl.gsi.gov.uk on behalf of lupenquiries@hsl.gsi.gov.uk  
**Sent:** 04 November 2019 10:50  
**To:** Kisha McQuany  
**Subject:** Re: lakisha.mcquany@lpswich.gov.uk sent you files via WeTransfer

Dear Lakisha

HSE is in discussions with MHCLG on the new requirement to describe, identify and assess, where relevant, expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development. Until HSE has received clarity from MHCLG we can only provide high level suggestions at this time.

HSE assumes that you have consulted us as your proposed development is vulnerable to a major accident as it sits within a consultation zone around a major accident hazard site or pipeline.

If you would like early reassurance that the development you are proposing would meet HSE's land use planning advice criteria in regard to public protection, then we suggest you access HSE's Land use planning information and advice by using the Land Use Planning Web App and pre-application advice service (<https://pa.hsl.gov.uk/>). You can also use this service to see if is located within a consultation zone.

If the proposed development is not in scope of the Control of Major Accident Hazards (COMAH) Regulations, the safety concerns related to any work activity would be addressed under the Health and Safety at Work, etc Act 1974 and its relevant statutory provisions. In particular, this consideration should be discharged under a management of Health and Safety at Work Regulations requirement to prepare a suitable and sufficient risk assessment for proposed activities, identifying hazards and taking appropriate measures to manage and control the risks (<http://www.hse.gov.uk/risk/index.htm>).

Under GB's health and safety legislation, HSE does not have a role in examining risk or hazard assessments unless the circumstances are covered by specific regulations (e.g. on-shore chemicals sectors where threshold levels of dangerous substances are exceeded). There are no additional requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE. However, it may be beneficial for the employer to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.

If you require further help with this then please contact us again.

Regards

Sue Howe

HSE's Land Use Planning Support Team  
HSE Science and Research Centre  
Harpur Hill, Buxton, Derbyshire, SK17 9JN  
Direct: +44 (0) 203028-3708  
Find out how HSE is [Helping Great Britain work well](#)

For HSE's Land Use Planning Advice Terms and Conditions, please click on the following link <https://www.hsl.gov.uk/planningadvice> and then click on 'terms and conditions'.

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Ipswich District (B)  
Ipswich Borough Council  
IPSWICH  
Suffolk  
IP1 2DE

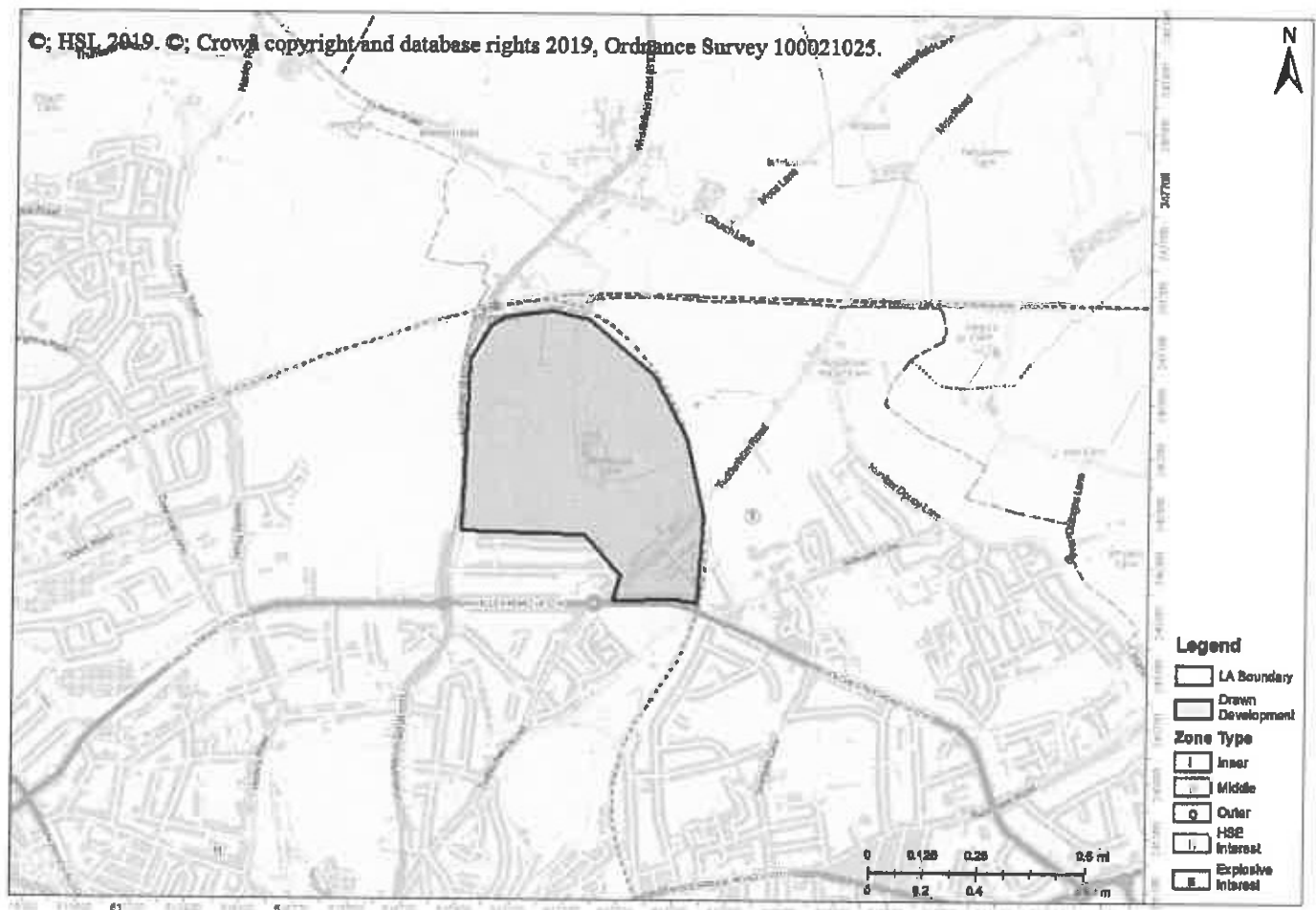


**Advice :** HSL-191106092852-169 Does Not Cross Any Consultation Zones

**Your Ref:** DM 2019 030

**Development Name:** Red House Farm

**Comments:** Scoping Opinion



The proposed development site which you have identified does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline; therefore at present HSE does not need to be consulted on any developments on this site. However, should there be a delay submitting a planning application for the proposed development on this site, you may wish to approach HSE again to ensure that there have been no changes to CDs in this area in the intervening period.

This advice report has been generated using information supplied by Catherine Abbott at Ipswich District (B) on 06 November 2019.



4 November 2019

Lisa Evans  
Ipswich Borough Council

By email only

Dear Lisa,

**Application: DM/2019/0230**

**Location: Red House Farm, Tuddenham Road, Ipswich, Suffolk**

**Proposal: EIA Scoping Opinion - Red House Farm development within the Ipswich Garden Suburb site.**

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*Thank you for requesting advice on this application from Place Services's ecological advice service. This service provides advice to planning officers to inform Ipswich Borough Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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Thank you for consulting us on this EIA scoping opinion for this development proposal. We have the following comments.

### **Ecological comments**

#### **Baseline Information:**

The desktop assessment should be prepared based on a local data search supplied by the Suffolk Biodiversity Information Service (SBIS) and records should inform the survey requirements. Priority and Protected Species need to be adequately considered adequately and all records from new or updated surveys undertaken should be shared with SBIS as a matter of best practice.

#### **Potential Impacts:**

We note that a Preliminary Ecological Assessment (PEA) has been undertaken although this has not been made available.

#### **Designated sites**

This proposed project lies within the Zone of Influence for the Suffolk Coast Recreational disturbance Avoidance and Mitigation Scheme (RAMS) and is relevant development so, without mitigation, is predicted to result in adverse effects on the integrity of Stour & Orwell Estuaries SPA and Ramsar site,

in combination with other plans and projects. As mitigation for recreational impacts at the Habitats sites can be delivered by the Suffolk Coast RAMS, the LPA will need to prepare a project level HRA stage 2 Appropriate Assessment and secure a proportionate financial contribution towards the RAMS for each phase of the development, in line with Natural England's advice regarding Ipswich Garden Suburb, over





and above that provided for the IGS Country Park. We note that likely impacts on other designated sites nearby include recreational pressure on Dales Open Space LNR and Christchurch Park CWS.

#### **Protected species**

We note the summary of surveys for protected species undertaken to date and offer the following comments.

#### **Bats**

We welcome the statement that the scattered mature trees, tree lines and hedgerows will be retained, where possible, and recommend that the Ecological assessment includes reference to Important Hedgerows (particularly as bat survey conducted at the Henley Gate site recorded Barbastelle bats which trigger this status for hedges with any passes or this Annex II species) irreplaceable and Priority habitats in line with NPPF as well as local policy DM10 (Protection of Trees and Hedgerows). It is noted that the bat survey conducted at the Henley Gate site recorded Barbastelle bats which trigger this status for hedges with any passes or this Annex II species. The project has been planned to avoid impacts on these priority habitats by direction drilling and buffer zones. Reasonable mitigation measures have been identified for the construction process which will need to be secured by a condition of consent.

We note that no trees with potential roost features for bats have been identified for removal, however, the PEA considered that if any of these are removed, then further surveys would be required. This would be necessary prior to determination to provide certainty of likely impacts to protected and priority species and that any necessary mitigation will be appropriate and effective being secured by other a condition of any consent or a mitigation licence.

#### **Dormouse**

We agree that as there is connectivity between the hedgerow on the Henley Gate IGS site with confirmed Dormouse presence on and the Red House Farm site via interconnecting hedgerows and habitat along the railway line, dormice may also be present within the red line boundary. We therefore welcome the statement that Dormouse surveys have been conducted from July to November 2019, with 75 tubes being deployed within the hedgerow and edge habitats of the site.

#### **Gt Crested Newt (GCN)**

We welcome sensitive working practices despite the likely absence of GCN as this will conserve Priority species amphibians such as Toad which could be present in ponds on the site.

#### **Reptiles**

Given the presence of slow worms and common lizards on the other two parts of IGS, we look forward to seeing the results of the presence / likely absence survey which has been conducted across the site this year.

#### **Priority Habitats**

We welcome reference to irreplaceable habitats such as veteran trees as included in the NPPF although there appears to be little reference to Priority habitats on site including hedgerows except in para 4.6.29.

#### **Priority species**

The ecology chapter of the ES needs to consider the potential impacts on all the relevant protected and Priority species and avoid, mitigate or compensate for all impacts, not just significant ones. This is necessary for the Local Planning authority to demonstrate they have met their s40 biodiversity duty. Survey and assessment should meet the requirements of both Natural England Standing Advice and the Suffolk Biodiversity Validation Checklist.



We note that the Site is dominated by arable fields, although we disagree with paragraph 4.6.3 that states "this means it will have little ecological value", and indeed paragraph 4.6.20 reports that Skylark and Brown Hare, both Priority species typical of farmland were recorded. It was also considered that Hedgehogs are likely to be present and affected by the development. Surveys to assess these impacts are considered reasonable and should be included in the ecology chapter of the ES with results and details of mitigation and compensation as necessary to conserve and enhance Priority species.

All impacts on ecological features, not just significant ones, should be provided to the LPA to enable it to demonstrate it is meeting its Biodiversity duty.

**Methodology:**

We are satisfied that the ecological assessment will follow nationally agreed guidelines including undertaking all survey work has been undertaken in the appropriate season by appropriately qualified ecological experts as required by EIA Regulations. We note that the Ecology chapter of the Environmental Statement will follow CIEEM guidelines for EclA.

It would be helpful to the LPA if the applicant provides a section on Information to support HRA whereby the natural greenspace on site will connect with the IGS country park and public rights of way to provide & promote a daily walk route of 2.7km to avoid impacts on the Habitats sites from the development alone.

**Opportunities:**

We note that para 4.6.34 states that the ES will set out any ecological enhancement proposed. To comply with NPPF, there is an opportunity to enhance the development in order to deliver measurable net gain for biodiversity and this should include integral bird (eg swift) and bat boxes in all dwellings and if not already secured as mitigation, hedgehog-friendly fencing throughout the development. The Ecology chapter should cross reference with other chapters in the ES to thoroughly explore all reasonable options to enhance the development for Protected and Priority species.

Please contact me with any further queries.

Yours sincerely,

**Sue Hooton CEnv MCIEEM BSc (Hons)**  
Principal Ecological Consultant  
Place Services at Essex County Council  
[ecology.placeservices@essex.gov.uk](mailto:ecology.placeservices@essex.gov.uk)

**Place Services provide ecological advice on behalf of Ipswich Borough Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Your Ref: DM/2019/0230  
Date: 05 November 2019  
Enquiries to: Cameron Clow  
Tel: 01473 260171  
Email: [cameron.clow@suffolk.gov.uk](mailto:cameron.clow@suffolk.gov.uk)



Ms Lisa Evans  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Suffolk  
IP1 2DE

Dear Ms Evans,

**Re: Consultation on Scoping Opinion under Environmental Impact Assessment Regulations 2017, Red House Farm, Tuddenham Road, Ipswich**

I refer to your letter dated 10 October 2019 to various services within Suffolk County Council, thank you for consulting Suffolk County Council on the scope of the Environmental Impact Assessment for the following development:

*Proposed Red House Farm development within the Ipswich Garden Suburb. up to 1,100 dwellings, a secondary school including sixth form, a primary school with early years provision, a local centre, formal and informal open space and associated infrastructure. Land to the east of Henley Road and north of railway line, Ipswich.*

The County Council is responding on potential significant environmental impacts that relate to its responsibilities and has the following comments to make in relation to the applicant's Scoping report.

In each case, the County Council would be pleased to supply additional baseline data where possible and appropriate, in line with statutory requirements. The County Council would also expect to see proposals for mitigation measures, in line with regulations.

Archaeology

Suffolk County Council Archaeological Service responded to the consultation on 18 October 2019 highlighting the potential impacts, methodological approaches and the Historic Environment Record as a source of information.

Climate Change

The Scoping Report states that Climate Change will be incorporated into the Environmental Statement (ES). Adaptation measures are recognised, with the emphasis on flood-risk. The 2009 UK Climate Projections have now been superseded by those published in 2018.<sup>1</sup> The 2018 projections also provide further degree of detail.

Other aspects of adaptation could also be incorporated including excess heat and water stress.

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<sup>1</sup> <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Given that the site is within a protected area for drinking water from surface sources, the ES will need to review the impact on water quality. The geo-environmental desk study does review risks for pollution of ground water, but only from the context contaminated land. The control of the water to mitigate flood risk, change of the surface water.

Whilst it is perhaps not appropriate to characterise carbon emissions as a significant impact arising from this development individually, an account should be made of how the need to minimise carbon emissions influenced the choice of options.

### Demography

The addition of new housing will increase the stock of new homes in the area and will change the number and demographic characteristics of the population local population. In particular, reference to how the impacts of the needs of young people (education and play facilities) and older people (housing standards and accessibility in the wider built environment) can be mitigated should be made. Alternative options should be tested and set out in relation to the design and layout of the development.

**Potential Impact:** The demographic make up of the new development is likely to have secondary effects on education, health and local services.

**Baseline Information:** The County Council would be pleased to share information relating to the number of children likely to live in the new development. Data on the number and likely housing needs related to older people at a district level is available from a tool provided by the Housing Learning and Improvement Network, known as Shop@.<sup>2</sup> This will provide useful indicative information on the demographic makeup of the development. The State Of Suffolk 2019 report and the Suffolk Observatory<sup>3</sup> also contains information on the demographics of the county<sup>4</sup>.

**Methodology:** Whilst there is no single methodology for considering impacts on older people, the Government's 'Lifetime Neighbourhoods' report offers a useful guide to the spatial needs of older people. For considering the impacts on Suffolk County Council services, including those for young people, please see the *Section 106 Developers Guide to Infrastructure Contributions in Suffolk*.<sup>5</sup>

### Education, health and local services

The County Council welcomes recognition of the need to assess impacts on local services as an environmental impact.

**Potential Impact:** Additional population, including in combination impacts, will place additional demands on local services, potentially leading to them being stretched beyond their intended capacity.

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<sup>2</sup> See <https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPAT/>

<sup>3</sup> See <https://www.suffolkobservatory.info/>

<sup>4</sup> See <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-who-we-are>

<sup>5</sup> See <http://www.suffolk.gov.uk/business/planning-and-design-advice/planning-obligations/>

**Baseline Information:** The County Council would be pleased to supply baseline data in relation to County Council services. Existing capacity at school and early years facilities, and additional demand arising, will be particularly useful and will be supplied upon request.

**Methodology:** Suffolk County Council's approach to mitigating the impacts of development on County Council services can be found in the *Section 106 Developers Guide to Infrastructure Contributions in Suffolk*. The inter-relationship between transport and the provision of services is a particularly important consideration.

### Mineral Resources

The site is not within the Minerals Consultation Area (as defined through the Suffolk Minerals Core Strategy), meaning that there is no policy requirement for mineral extraction ahead of development.

However, the County Council as Minerals Planning Authority is interested in increasing the number of sites which provide some of their own minerals, through limited extraction on site as part of the normal construction process. This limits the need for minerals to be brought on site from elsewhere, and reduces the need for minerals to be extracted at other locations and transported across the County. The site is large enough that appropriate provision could be made for assessing the mineral resource.

### Public health

While a Health Impact Assessment is not a necessary part of an EIA, a human health section would help to synthesise the different elements of the Environmental Statement. As is stated in paragraph 5.1.17 a number of assessments already undertaken for the purposes of human health are being included in their own dedicated sections, such as noise and air quality. The ES could then link these to the wider determinants of health, not just affecting the future residents of the development, but also existing neighbouring communities.

This could include (but not be limited to):

- how transport assessments lead to a strategy to encourage greater active travel, improving physical fitness and cardiovascular health for residents of the development and the surrounding areas;
- how assessing the impact of emissions will connect to the protection of respiratory health;
- the health benefits from the provision of new homes alongside associated community infrastructure;
- how assessment of noise and vibration will lead to mitigation and avoid health impact; and
- how rights of way can enable access to the countryside benefiting physical and mental health.

The application submitted by Crest for Henley Gate included an assessment of health impacts which could be used as a template for this application

The State of Suffolk report contains information on the health and wellbeing of the residents of Suffolk which could be used to highlight potential issues new residents may be exposed to<sup>6</sup>.

### Traffic

- Potential Impact:** The County Council agrees with the summary of the likely significant effects outlined in paragraph 4.1.12, however considers there are areas requiring assessment not outlined in the methodology
- Baseline Information:** The County Council hold injury accident records and traffic count and speed data. The council also uses a county wide model of traffic, which could be used to inform the Transport Assessment (TA) and resulting elements for the ES.
- Methodology:** The key recommendation that a separate TA will be carried out is fully supported, the development site is very large and will generate significant traffic movements, both singularly and cumulatively with the rest of Ipswich Garden Suburb (IGS). The commitment to build upon the previous work done on the Henley Gate and Fonnereau Village developments is also welcomed. The development trip rates used for the two previous developments were agreed following a detailed independent review, and we would expect that these trip rates would form the basis for the trip generation for this site, as evidenced in the TA.

In the scope of assessment (4.1.15) section we would reiterate the position stated in our email of 9th September 2019 to Adam Smith of Vectos, that while the junctions listed are likely to be the most significantly impacted by development traffic, we would also expect the two junctions on the A1214 east of the site, Rushmere Road roundabout and the Heath Road / Woodbridge Road gyratory to require assessment as well. While the main distribution of trips is likely to be to the south to the town centre and other key local services, it is likely that significant traffic will be heading to the east of the site, to Ipswich NHS Hospital, Ransomes Europark / Futura Park and BT Adastral Park, all significant local employment sites.

Therefore the list currently set out in 4.1.15 is not agreed, these two additional junctions; A1214 / Rushmere Road and A1214 / A1189 (Heath Road) need to be included in the assessment list. The collision data investigation area should also be extended to cover the expanded junction assessment scope as well.

The assessment will also need to consider the impact on the rural routes to the north of the site, and some of the residential streets either side of the A1214 corridor. As the main strategic routes become more congested by traffic growth it is likely that traffic will partially migrate to less suitable routes. The rural roads to the north are in parts very narrow and not conducive to significant increases in traffic and a management strategy will be required to deal with impacts on these roads arising from the development.

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<sup>6</sup> <https://www.healthysuffolk.org.uk/isna/state-of-suffolk-report>

As part of the sustainable transport package for the site we would expect that considerable thought is given to an enhanced bus service for the whole Ipswich Garden Suburb, building on the services proposed for the Henley Gate and Fonnereau Village phases. Particular attention should be given to potential measures to give buses priority over private vehicles on their journeys to and from the town centre. The extensive Public Rights of Way network in the vicinity of the site is also an opportunity to improve access to the countryside and for walking and cycling to key destinations of attractive traffic free routes. The off site routes should be considered alongside the internal IGS walking and cycling routes to come up with a comprehensive access strategy which will contribute to significant modal shift away from the use of private motor vehicles.

### Waste

Waste will be generated during construction and occupation of the site. This response assumed that no additional waste material will be imported onto the site. The commentary in the report (5.1.20 – 5.1.23) relating to waste provides a reasonable indication of how waste is to be treated in the application.

The construction code of practice for the sustainable use of soils on construction sites (DEFRA 2009) should be incorporated into the construction management plan<sup>7</sup>.

### Flood Risk and Water Management

This chapter "Flood Risk and Drainage" should be named "Flood Risk and Water Management" to reflect that water should be treated as a resource that should be valued, rather than just a problem to be mitigated. The chapter should consider the net gains to the environment and biodiversity that could be provided through the provision of sustainable drainage systems.

**Potential Impact:** As well as the impacts listed from paragraphs 4.7.7 – 4.7.10, the positive impacts of environmental and biodiversity gain should be considered.

**Baseline Information:** The County Council has historical flood information, predicted flood information and a surface water management plan for Ipswich. The Environment Agency and their River Basin Management Plan should provide some information on water quality.

**Methodology:** The assessment should inform the SuDS design and confirm requirements for water quality treatment SuDS as set out in planning practice guidance paragraph 69 (Reference ID: 7-069-20140306). Preparation of a drainage strategy should consider the policy and guidance in the Suffolk Flood Risk Management Strategy<sup>8</sup> and specific guidance on SuDS design is in the appendix of this document.

The proposed site surface water drainage strategy resulting from the EIA should identify the size and locations of SuDS and address the contribution that water management can make to net gains.

<sup>7</sup> See <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>

<sup>8</sup> See <http://www.greensuffolk.org/flooding/flood-risk-management-strategy/>

**For clarity, as in the climate change section of this response, the 2018 climate change projections should also be used in assessing flood risk.**

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**I hope that these comments are useful. Please get in touch if I or any other County Council officer can clarify any of the comments above, or supply useful information.**

**Yours sincerely,**

**James Cutting  
Head of Planning  
Growth Highways and Infrastructure**



## Rebecca Sands

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**From:** James Cutting <James.Cutting@suffolk.gov.uk>  
**Sent:** 05 November 2019 15:59  
**To:** Cameron Clow; Lisa Evans  
**Cc:** Rebecca Sands  
**Subject:** RE: Red House Farm Scoping

Lisa,

Sorry, Cameron and I have just noticed that we forgot to make reference to the place based needs assessment for Ipswich. In your response, could you include:

Place Based Needs Assessment for specific geography including Ipswich has been produced recently which focused on wider determinants of health in the localities including Ipswich which can be found here [https://www.healthysuffolk.org.uk/uploads/IPSWICH\\_PBNA\\_Report\\_1-0.pdf](https://www.healthysuffolk.org.uk/uploads/IPSWICH_PBNA_Report_1-0.pdf)

James Cutting  
Head of Planning  
Telephone: 01473 264803  
Email: [james.cutting@suffolk.gov.uk](mailto:james.cutting@suffolk.gov.uk)

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**From:** Cameron Clow <[Cameron.Clow@suffolk.gov.uk](mailto:Cameron.Clow@suffolk.gov.uk)>  
**Sent:** 05 November 2019 13:41  
**To:** Lisa Evans <[Lisa.Evans@ipswich.gov.uk](mailto:Lisa.Evans@ipswich.gov.uk)>; James Cutting <[James.Cutting@suffolk.gov.uk](mailto:James.Cutting@suffolk.gov.uk)>  
**Cc:** Rebecca Sands <[Rebecca.Sands@ipswich.gov.uk](mailto:Rebecca.Sands@ipswich.gov.uk)>  
**Subject:** RE: Red House Farm Scoping

Dear Lisa,

Please see attached our final response to the Red House Farm scoping request. Thank you for allowing us some extra time.

Kind regards,  
Cameron

Cameron Clow  
Planning Officer  
Suffolk County Council

01473 260171

Date: 05 November 2019  
Our ref: 297599  
Your ref: DM/2019/0230



Lisa Evans  
Principal Planning Officer – Special Projects  
Ipswich Borough Council

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Lisa

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Red House Farm development within the Ipswich Garden Suburb site**  
**Location: Ipswich**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated and received on 10<sup>th</sup> October.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me on francesca.shapland@naturalengland.org.uk or 0208 0265792. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Francesca Shapland  
Lead Adviser, Norfolk & Suffolk Team

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<sup>1</sup> Harison, J In *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainableenvironmental/environmentalimpactassessment/noteenvironmental/>

## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites.

European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In

addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

**Sites of Special Scientific Interest (SSSIs) and sites of European or International Importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

The development site is approximately 4km from the following designated nature conservation site

- The Stour & Orwell Estuaries SPA & Ramsar site
- The Orwell Estuary SSSI
- Further information on the SSSI and its special interest features can be found at [www.magic.gov.uk](http://www.magic.gov.uk). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within Orwell Estuary SSSI and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- European site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

As submitted, this development proposal has the potential to affect the Stour and Orwell Estuaries SPA and Ramsar site which are European sites afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). These sites are also notified at a national level as the Orwell Estuary SSSI; the relevant interest features of the SSSI in this case broadly relate to those associated with the European sites and so the following comments are applicable in both an international and national context.

As you will be aware, Natural England has concerns regarding the impacts of recreational pressure on the Orwell Estuary, in particular the disturbance of birds for which the site is in part notified. We consider that housing developments (or 'projects' in HRA terms) such as this have the potential to increase levels of recreational disturbance to the estuary. The birds associated with the estuary are sensitive to disturbance from recreation, in particular off-lead dog walking, and the unique attraction of the estuary presents a strong draw for undertaking such activities.

It is therefore essential that, within the shadow HRA report, an assessment of the likely recreational disturbance impact from the development is included. This should be based on current designated site information (e.g. the Conservation Objectives, Site Improvement Plans (SIPs) etc.), bird survey data (e.g. Wetland Bird Survey (WeBS) Core Counts for assessing wintering populations at high tide, Low Tide Counts for identifying important feeding areas within the intertidal habitat etc.) and visitor information. As well as this, full details of the measures proposed to address recreational impacts should be included within the report.

We welcome the provision of the country park, as previously agreed within discussions concerning the Ipswich Garden Suburb applications. As you will be aware, Ipswich Borough Council, in partnership with East Suffolk and Babergh District Councils, has produced a joint Suffolk HRA Recreational Avoidance and Mitigation Strategy (RAMS). The RAMS specifies developer

contributions to an agreed and costed scheme of measures to help avoid and mitigate recreational disturbance impacts to designated sites within 13km of the European sites (including the Stour & Orwell Estuary SPA, Ramsar site) over the respective plan periods. We therefore recommend that this proposal is included within the RAMS strategy, with funds collected per house.

As well as the above measures, we also expect a generous green infrastructure provision within the site itself, to support residents, with facilities such as play & picnic areas and dog walking routes to keep residents on site for some of their activities.

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

### **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

### **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

### **2.6 Contacts for Local Records**

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## **3. Designated Landscapes and Landscape Character**

### **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the

cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

#### **Heritage Landscapes**

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

#### **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

#### **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby Click here to enter text. National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

#### **5. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.
2. This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see [www.magic.gov.uk](http://www.magic.gov.uk). Natural England Technical Information Note 049 - *Agricultural Land Classification: protecting the best and most versatile agricultural land* also contains useful background information.
3. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or

more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.

4. The Environmental Statement should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development.

## **6. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **7. Climate Change Adaptation**

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

## **8. Cumulative and In-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment. Note that in order to establish the in-combination effect on the Suffolk RAMS sites, Natural England expects a detailed in-combination assessment to be provided. This assessment should assess the effect of the current application in-combination with the Local Plan allocations and any other residential applications currently in the planning system. Our main concern with regards to the in-combination effect is increased recreational activity.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.



### **Ancient Woodland**

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice [http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland\\_tcm6-32633.pdf](http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf).

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 175)<sup>2</sup> which states:

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts);
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

## Rebecca Sands

---

**From:** Ben Woolnough <Ben.Woolnough@eastsuffolk.gov.uk>  
**Sent:** 11 November 2019 16:07  
**To:** Lisa Evans; Rebecca Sands  
**Cc:** Rosalynn Claxton  
**Subject:** DM/2019/0230 (IBC) and DC/19/3985/CON - Red House Farm, Tuddenham Road, Ipswich.

Dear Rebecca,

Thank you for consulting East Suffolk and apologies for the delayed response. East Suffolk supports the delivery of the Ipswich Garden Suburb and is pleased to see that the Red House Farm parcel may be progressing towards a planning application.

The East Suffolk district boundary is adjacent to the site and the therefore this proposal will have direct and indirect effects on the East Suffolk environment. We recognise through previous close working on the Ipswich Garden Suburb that Ipswich Borough will give thorough attention to the communities and environment outside of the Borough boundary. We have reviewed the submitted scoping report and have the flowing comments limited to the cumulative scope of any Environmental Statement. We have not taken this as an opportunity to comment on the specific subject areas scoped in and scoped out and appreciate that you are being guided by statutory consultees in respect of relevant areas.

### *Cumulative Assessment*

The report recognises Inter-project effects and the potentially cumulative effects of development in and around Ipswich are well established. Previous parcels of the Garden Suburb have been more limited in the scope of their cumulative committed sites due to the timing of their submission. However, the picture has considerably changed in recent years, particularly through the influence of East Suffolk permissions and allocations. The Inter-relationship of the District and Borough developments may not be visually apparent but there a clearly effected relationships in terms of transport, ecology and biodiversity, air quality and socio-economics.

- Recently an outline application for 2,700 homes (DC/19/1988/OUT) was submitted in Foxhall (Orwell Green) though it has now been withdrawn. In the EIA scoping of that proposal, Ipswich Garden Suburb formed part of committed sites required to be included in the assessment of cumulative effects. As it was withdrawn it does not need to be considered a committed site but depending on the timing of submission the applicants should monitor the status of the site and if it is resubmitted it may again become a committed site which should be included.
- Since the submission of other Garden Suburb sites, the outline planning permission for land to the south and east of Adastral Park, Martlesham (Brightwell Lakes) has been approved (DC/17/1435/OUT). That application was accompanied by a comprehensive Environmental Statement and it is a committed development which should be included for cumulative assessment.
- The emerging Suffolk Coastal Local Plan includes an allocation on the east of Ipswich, Policy SCLP12.24: Land at Humber Doucy Lane, and this comprehensive site is to cover both East Suffolk and Ipswich Borough. The Local Plan has been through examination in public and the council awaits the Inspectors report. Adoption is likely to be in the early part of next year and therefore this site, in-line with IBC's position, should be included for cumulative assessment. This is not an exhaustive suggestion of emerging allocations and the applicants should carefully review all emerging allocations in the East Ipswich area and in the local vicinity of the A12 and A14 in judging the cumulative effects.

Finally, anticipating that a planning application is not imminent for this proposal, consideration will need to carefully be given to Nationally Significant Infrastructure Proposals in East Suffolk and how, particularly from a transport perspective, they may result in cumulative effects. Those proposals are:

- Two Scottish Power Renewables applications for Development Consent Orders which were submitted to the National Infrastructure Unit of PINS on 25 October. The applications seek consent for East Anglia One North and East Anglia Two offshore wind farms.

- Sizewell C Nuclear Power Station, the Development Consent Order for this proposal is expected to be submitted by early next year.

All of these developments would need to be considered as committed developments when considering cumulative effect. It may be they both have scoped Ipswich Garden Suburb in for their own effects.

The other matter that we wish to raise relates the integration of consideration of Habitats Regulations considerations in the Environmental Statement. The Scoping report notes the local Estuary SPA's. As you are aware, we have all worked together for the Suffolk Coast Recreational Avoidance Mitigation Strategy. The recreational effects of this development therefore need to be considered under a cumulative scope and account for the role that RAMS will play in partly mitigating this development. East Suffolk expects its own major developments to address mitigation, when within RAMS Zones of Influence, through both on-site open space measures and contributions to RAMS.

I trust that you find this feedback of assistance and look forward to working further with you on this scheme. A formal consultation response will follow.

Kind regards

Ben



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East Suffolk Council is a new district authority which, from April 2019, delivers services for the residents, businesses and communities previously served by Suffolk Coastal and Waveney District Councils



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